



Massachusetts Balance of State Continuum of Care

Massachusetts Balance of State Continuum of Care HMIS Comparable Database Participation

Publication Date: 10/27/2020

Victim Service Providers (VSPs), as defined in in [24 CFR 576.3](#), are prohibited from entering participant-level data into the certified local Homeless Management Information System (HMIS). Victim Service Providers, instead, must collect and enter participant-level information into a separate HMIS Comparable Database, and provide aggregate data to the Continuum of Care (CoC). A Comparable Database must comply with all HMIS requirements as outlined in the most current [HMIS Data Standards Manual](#). A Comparable Database is an alternative system that VSPs use to collect participant-level data over time and to generate aggregate reports based on the data. The CoC and VSPs must work with the HMIS Lead to determine if a system meets the standards for a Comparable Database and document that the alternative system meets all HUD system requirements. It is the responsibility of the VSP to be aware of any other requirements of a software solution as set forth by its other funders or applicable laws.

Certification

The [CoC Program Interim Rule](#) clarifies that it is the responsibility of the CoC to select an HMIS software solution and designate an eligible entity to serve as the HMIS Lead to manage and administer the local HMIS. It is the joint responsibility of the CoC and the HMIS Lead to ensure a selected Comparable Database software meets HMIS standards. Victim Service Providers should work with the CoC and HMIS Lead before entering into a contract with a software vendor to ensure the selected software solution can be certified as an HMIS Comparable Database. Per section [578.57\(a\)\(3\)](#) of the CoC Program Interim Rule and section [576.107\(a\)\(3\)](#)

of the ESG Program Interim Rule, CoC and ESG funds may be used to establish and operate a Comparable Database.

Custom-built software solutions are not eligible for certification, only software products available on the open market will be reviewed by the HMIS Lead.

The HMIS Lead will undertake a two-part certification process for Comparable Databases used by VSPs within the CoC.

Part I: Initial HMIS Comparable Database Certification

The HMIS Lead will review software solution(s) proposed by a recipient or subrecipient VSP to ensure the software solution meets the minimum standards required by HUD and the HMIS Lead. At this time, the CoC and HMIS Lead have chosen not to be prescriptive about which Comparable Database solution must be purchased and used by individual VSPs. However, the CoC and HMIS Lead reserve the right to change this policy in the future.

HMIS Comparable Database software solutions will be certified and acceptable for use by recipient and subrecipient VSPs if:

- The HMIS Comparable Database product meets all HUD HMIS requirements:
 - [Parts 4 and 5 outlined in the 2004 HMIS Data and Technical Standards](#) Final Notice 69 FR 45887
 - Meet all required functionality, data collection, deduplication, reporting, audit trail functionality, and other HMIS requirements established by HUD in notice
 - Set forth in the most recent versions of the HMIS Data Standards Dictionary and HMIS Data Standards Manual
 - Is able to produce HMIS CSV datasets that comply with the most recent version of the HMIS CSV Format Specifications
 - Is able to accurately produce, at a minimum, the following HUD-required reports:
 - Annual Performance Report (APR)

- Consolidated Annual Performance and Evaluation Report (CAPER)
- Point in Time (PIT) report
- The HMIS Comparable Database is a proven solution with a history of successful implementations elsewhere
- The software vendor pushes automatic updates that comply with HUD HMIS regulations to all its HMIS Comparable Database customers.

In order for this certification to take place, the VSP will work with the HMIS Lead to arrange a demonstration of the proposed HMIS Comparable Database software. This is best done by providing the HMIS Lead access to a demonstration database or training site with sample participant-level data, with which the HMIS Lead can determine if the system meets minimum requirements. However, if a demonstration database or site is unavailable, other arrangements may be made, such as a live demonstration by the software vendor. The HMIS Lead will investigate the capacity and functionality of the software and make a determination regarding its compliance with HMIS requirements independent of statements and assurances of the software vendor or endorsements by local or national organizations or agencies. If a recipient or subrecipient VSP has already purchased or entered a contract with a Comparable Database software vendor, this certification process will take place for their existing software solution and possible remediation will take place if certification cannot be reached (see Non-Compliance section below).

Once certified, VSPs will be required to provide the HMIS Lead with a signed and dated contract outlining the software vendor's provision of an HMIS Comparable Database to the VSP.

If a software vendor offers HMIS Comparable Database packages that are partial (for example, paying by specific reports needed) that is acceptable as long as the package contracted for includes all of the reports needed to fulfill current funding requirements and the Vendor has the ability to port in any additional HMIS-compliant reports that may be needed in the future.

Part II: Ongoing HMIS Comparable Database Certification

As HUD HMIS Data Standards and requirements are updated routinely (roughly every other year), it is the responsibility of the CoC and HMIS Lead to ensure continued compliance among HMIS Comparable Databases used by VSPs. As such, the HMIS Lead will perform regular compliance checks (in whole or in part).

Non-Compliance and Ineligibility of Comparable Database

The HMIS Lead may decline to certify any software solution as an HMIS Comparable Database for failure to meet the conditions outlined above. If the failures appear to be minor, the HMIS Lead may choose to consult with the vendor about the amount of effort required to remediate those failures and may choose to enter into a Memorandum of Understanding (MOU) to bring the software into compliance on a set timeline. If the timeline is not met, the software will not be certified. If the HMIS Lead finds the failures to be significant enough that they cannot be easily rectified, the software solution will not be certified by the HMIS Lead and will not be eligible for certification again for 12 months.

If a software solution does not meet the minimum certification requirements, the following process will be followed by the CoC and HMIS Lead:

1. The HMIS Lead will send written notification to the VSP in the form of a Findings Report outlining the requirements not met by the software solution. A copy of this Findings Report will be sent to the CoC for record.
2. Upon request, the VSP may set up a time to discuss this Findings Report with the HMIS Lead.
3. Within 30 days, the VSP will be required to submit a written Remediation Plan to the HMIS Lead. This Remediation Plan must outline the VSP's plan to address the findings outlined by the HMIS Lead and include a timeline for correction. The VSP must work directly with their software vendor to determine this timeline for addressing issues outlined by the HMIS Lead.

4. The HMIS Lead will review the VSP's Remediation Plan and determine if the plan addresses all identified concerns and if the timeline is reasonable. The HMIS Lead recognizes the possibility of extenuating circumstances, and in consultation with the VSP, the HMIS Lead will determine a reasonable and achievable timeline for all corrective actions necessary.
5. Upon the VSP's completion of all corrective actions, the HMIS Lead will conduct an exit interview at which time corrective actions will be reviewed before a final certification is granted.

If a software vendor has been found by the HMIS Lead to have engaged in bad faith practices such as deceptive product marketing, failure to deliver a contracted-for HMIS Comparable Database, falsification of reports, etc., then the software vendor may be barred from certification for a period of no less than three (3) years, or indefinitely, at the discretion of the HMIS Lead.