



Office of Temporary and Disability Assistance

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Local Commissioners Memorandum

Section 1

Transmittal:	19-LCM-03
To:	Social Services District Commissioners
Issuing Division/Office:	Integrated Family Assistance Program (IFAP)/ Housing, Refugee Services, and Disability Determinations (HRDD)
Date:	March 15, 2019
Subject:	Homeless Management Information System (HMIS)
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Attachments:	
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Section 2

I. Purpose

This Local Commissioners Memorandum (LCM) provides information to social service districts (districts) about Homeless Management Information Systems (HMIS), and addresses certain considerations relating to the districts' use of data in preparing homeless services outcome reports, as required under 18 NYCRR § 304.2.

II. Background

An HMIS is a local information technology system used to collect client-level data and data regarding the provision of housing and services to homeless individuals and families, and persons at risk of becoming homeless. The U.S Housing and Urban Development (HUD) requires each Continuum of Care (CoC) to establish and administer an HMIS for homeless services providers, or "Covered Homeless Organizations" (CHOs), operating within the CoC. OTDA encourages the districts to make use of HMIS data to prepare their homeless services outcome reports, so that both OTDA and the districts can use aggregate HMIS data to understand patterns of service use, to gauge the effectiveness of the districts' homeless programs, and to better inform State and local homeless policy decisions.

HUD requires each CoC to develop policies and procedures regarding the use of the HMIS data. In particular, CoCs must develop and implement policies addressing when and how client consent should be obtained, and the authorized re-disclosure of data in the HMIS by agencies participating in the CoC. These policies and procedures must meet HUD standards.

OTDA recognizes that a CoC may contract with a local agency to serve as the lead agency to administer the HMIS, or may elect to itself serve as the lead agency. The HMIS lead agency is authorized by the CoC to make system-wide decisions regarding the HMIS that can impact all

CHOs within the CoC. CoCs and HMIS lead agencies, with input from the CHOs and the district, are responsible for oversight of the HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data. These entities should also confirm that the maintenance, privacy, security, and confidentiality controls comply with applicable state and federal statutes, rules, regulations, and policies.

III. Program Implications

Pursuant to Social Services Law § 136 and 18 NYCRR, Part 357, to the extent that public assistance information is shared by a district with an HMIS, client consent is not required if the information is to be shared for purposes directly connected with the administration of public assistance. Information may be released to an HMIS when the district is assured that (i) the confidential character of the information will be maintained, (ii) the information will be used for the purposes for which it is made available, (iii) such purposes are reasonably related to the purposes of the public welfare program and the function of the HMIS, and (iv) the information will not be used for commercial or political purposes.

To the extent that a district intends to share information relating to homeless services that are not PA-related, client consent may be obtained using the HUD-required informed consent form developed by the HMIS.

Issued By

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