

APPENDIX A: FREQUENTLY ASKED QUESTIONS (FAQS)

1. Q: What is the difference between HMIS as a program component and HMIS as an eligible cost?

A: Under the CoC Program, HMIS can be funded as a program component and an eligible cost.

Program components establish the overall purpose and nature of the project that is being funded, whereas eligible costs specify what may be funded by the grant. Each program component is associated with eligible costs. There are five CoC Program components. All CoC projects must fit into one of these components. A project cannot include multiple components. When preparing a grant application, an applicant must first choose the program component that they want to apply under, and then it must specify the eligible costs it is seeking to be funded by the grant.

Allowable CoC Program Components include:

1. Permanent housing (which includes permanent supportive housing for people with disabilities and rapid re-housing)
2. Transitional housing
3. Supportive services only
4. HMIS
5. Homelessness prevention

Only an HMIS lead may apply for an HMIS dedicated project (i.e., HMIS component), whereas any project applicant may include HMIS eligible costs in their grant applications under the other program components. Eligible costs under the HMIS component are broader than those allowed under other program components.

For example, the Homeless Coalition, the HMIS lead for the CoC, receives a CoC Program grant under the HMIS program component to fund its CoC-wide HMIS system, including leasing its offices, staffing the CoC-wide system, and other costs associated with operating the HMIS. A different agency within the CoC receives a CoC Program grant under the permanent housing program component, which includes HMIS eligible costs to fund HMIS licenses and other costs associated with contributing data to the HMIS.

2. Q: Who is eligible to access CoC funds under the CoC HMIS program component?

A: Only HMIS leads are eligible to apply for funds under the CoC HMIS program component. While other applicants can apply for HMIS costs under the other component types, the following costs are unique to the HMIS component:

1. Hosting and maintaining HMIS software or data;
2. Backing up, recovering, or repairing HMIS software or data;
3. Upgrading, customizing, and enhancing the HMIS;
4. Integrating and warehousing data, including development of data warehouse for use in aggregating data from subrecipients that use several software systems;

5. Administering the HMIS;
6. Reporting to providers, the CoC, and HUD; and
7. Conducting training in use of the HMIS or a comparable database, including travel to the training.

3. Q: Who is eligible to access CoC funds for HMIS eligible costs?

A. HMIS is an eligible cost under all CoC Program components. CoC recipients and subrecipients who contribute data to an HMIS, but are not the HMIS lead, may use funds under the HMIS eligible cost to pay the expenses related to contributing data to the HMIS designated by the CoC for the area.

A project funded under the transitional housing program component, for example, can apply for funds for costs related to contributing data to the HMIS designated by the CoC. Only the HMIS lead agency can apply for HMIS costs that are unique to the HMIS program component.

4. Q: Are all CoC recipients and subrecipients required to enter data into HMIS?

A: Yes, with two exceptions: victim services providers and legal services providers. Both victim and legal services providers are required to collect client-level data according to the HMIS data collection requirements. Victim services providers are prohibited from entering client data into HMIS and must enter required data into a comparable database instead. Legal services providers are NOT prohibited from entering client-level data into HMIS, but may elect to use a comparable database instead of the HMIS, if the data is protected by attorney-client privilege. However, legal services providers are allowed to enter client data into the HMIS, where victim service providers are NOT. Both victim services providers and legal services providers may use CoC Program funds to establish and operate a comparable database that complies with HMIS requirements.

5. Q: What are the HMIS participation requirements for victim services providers?

A: Victim services providers that are recipients or subrecipients under the CoC Program are required to collect client-level data consistent with HMIS data collection requirements, BUT they must **not** directly enter data into an HMIS. To protect clients, victim services providers must enter required client-level data into a comparable database that complies with HMIS requirements. They may use CoC Program funds to establish and operate a comparable database. Information entered into a comparable database must not be entered directly into or provided to an HMIS. Victim services providers **MUST** provide aggregate data to the CoC for reporting purposes.

6. Q: What are the HMIS participation requirements for legal services providers?

A: Legal services providers that are recipients or subrecipients under the CoC Program are required to collect client-level data, consistent with HMIS data collection requirements. To protect clients, legal services providers may choose instead to enter data into a comparable database that complies with HMIS requirements. They may use CoC Program funds to establish and operate a comparable database. Legal services providers who do not use the CoC's HMIS, **MUST** provide aggregate data to the CoC for reporting purposes.

7. Q: Are the salaries of staff conducting data entry into HMIS and other HMIS-related overhead costs eligible as project administrative costs?

A: Staff and overhead costs directly related to contributing data to HMIS are considered HMIS eligible costs and are not eligible project administrative costs.

8. Q: How do I determine eligible HMIS costs if staff time/resources are not dedicated 100% to HMIS work?

A: The staff time dedicated to eligible HMIS-funded costs can be calculated as a proportion of that staff's overall time, and billed accordingly.