



Kent Homelessness Coalition

Grand Rapids/Wyoming/Kent County Continuum of Care – MI 506

Qualified Service Organization Business Associate Agreement (QSOBAA) Policy

- **Purpose and Goal:** The purpose of the QSOBAA is for agencies who participate in the Homeless Management Information System (HMIS) to agree to share protected client information between programs for the purpose of effective and efficient service delivery. This agreement governs how providers and project sharing settings are created in HMIS. The purpose of this document is to establish a policy and outline the procedure for approving an agency to sign the sharing agreement while ensuring data quality, privacy and security standards are maintained.
- The goal is for broader coordination across the homeless response system so that the impact on clients is positive and reflects a trauma informed approach to data collection, such as reduction in story sharing, expedient service delivery, and explicit consent.
- Agencies who participate in the QSOBAA must: Serve households who meet the HUD definition of homelessness (Categories 1, 2, and 4)
 - o Commit to Housing First* principles.
 - o Utilize the Coordinated Entry System for referrals for permanent housing resources.
 - o Become a member of the Continuum of Care to be in alignment with the strategic plan; and participate in committees and/or workgroups.
 - o Agree to the CoC's Service Delivery Standards.
 - o Subscribe to the CoC's Fair Housing and Anti-Discrimination Policy
- **Workflow:**
 - o Agencies that wish to sign the QSOBAA for coordination across the homeless response system or for participation in the Coordinated Entry System must complete an online application to describe goals and intended outcomes for the program.
 - o System Administrator will bring newly interested agencies to the Data Quality Committee (made up of existing QSOBAA agencies) for discussion and feedback. CoC staff will make a recommendation to the Executive Committee with consideration of feedback from Data Quality Committee to add agencies to the QSOBAA.
 - o Executive Committee will have final approval for adding new agencies upon consideration of input from the Data Quality Committee and CoC staff.
 - o CoC staff will notify the Steering Committee of agencies requesting to be added, and the outcome.

- **Agencies wishing to appeal Executive Committee’s decision may submit written communication to Steering Council within 5 business days. Steering Council shall make the final decision.**
 - System Administrator will initiate a new QSOBAA and facilitate the signature process as well as update HMIS and work with the new agency for provider and project set up.
 - The QSOBAA will be updated on a bi-annual basis, once in the spring and once in the fall, unless an agency must participate per funding source requirements.
- **Roles and Responsibilities:**
- **System Administrator:** Operate the HMIS system, set up and monitor providers and project level data and outcomes, train new users and provide opportunities for ongoing learning and engagement, manage the QSOBAA.
 - **Agency:** Data entry, monitor project level data quality, participate in CoC Committees and workgroups, abide by MSHMIS policies for HMIS use, and QSOBAA policies for data sharing.
 - **Data Quality Workgroup:** Participation is expected for all agencies on the QSOBAA. Convene to discuss system level data quality, prepare for federal reports, engage in ongoing learning opportunities, abide by the policies laid out in the QSOBAA and HMIS Sharing Agreement.

**Housing First is a proven model for addressing homelessness by quickly rehousing people experiencing homelessness and ensuring they have access to permanent housing and supportive services. Access does not have service participation requirements or preconditions (such as sobriety, or a minimum income threshold).*