

**HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) LEAD AGENCY  
MEMORANDUM OF UNDERSTANDING  
BETWEEN GUILFORD COUNTY (GC) AND  
GUILFORD COUNTY CONTINUUM OF CARE GOVERNING BOARD**

**Effective Date: January 1, 2026**

**I. Purpose and Background**

The purpose of this Memorandum of Understanding (MOU) is to confirm agreements between the Guilford County Continuum of Care Governing Board (CoC Board) and Guilford County (GC) also referred to as “the Parties”. The CoC Board is the lead decision-making body for the CoC. This MOU relates to the management of the Homeless Management Information System (HMIS) and establishes GC as the HMIS Lead Agency and Local System Administrator (LSA). This MOU further defines general understandings, roles, and the specific responsibilities of each party to the MOU as related to key aspects of the governance and operation of HMIS.

The Parties enter into this MOU wishing to maintain their own separate and unique missions and mandates, as well as their own accountabilities. Unless specifically provided otherwise, the cooperation among the Parties as outlined in this MOU shall only be construed as a partnership. Each Party shall accept full and sole responsibility for any and all expenses incurred by itself relating to this MOU. Nothing in this MOU shall be construed as superseding or interfering in any way with any agreements or contracts entered into among the Parties, either prior to or subsequent to the signing of this MOU. Nothing in this MOU shall be construed as an exclusive working relationship. The Parties specifically acknowledge that this MOU is not an obligation of funds, nor does it constitute a legally binding commitment by any Party or create any rights in any third party.

**II. Duration**

Except as provided in Section VII (Termination), the duration of this MOU shall be effective from January 1, 2026, through December 31, 2031, for a term of five years. The Parties will review, revise and affirmatively agree to the terms of this relationship annually (based on the annual review of the HMIS Lead and any changes in HUD regulations). This annual review is intended to ensure the continued relevance of the terms to the Parties and to ensure continued consistency and compliance with HUD regulations. The existing MOU may be extended by (a vote of) the CoC Board for up to a period of 90 days until a new version is executed.

**III. Definitions**

- a. **Agency Administrator** – is the assigned person who provide technical assistance within their assigned agency, support internal staff, attend trainings, provide data reporting information, reports, and data analysis
- b. **Guilford County:** is a local government organized under the laws of North Carolina that oversees the specific geographic region of Guilford County, North Carolina. (Reference: <https://www.guilfordcountync.gov>)
- c. **NC 504 Continuum of Care (CoC)-** A group within Guilford County, NC organized to carry out the responsibilities prescribed in the CoC Program Interim Rule for a defined geographic area. Membership is composed of representatives of: nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons. (Reference: <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578/subpart-F/section-578.75>)
- d. **CoC Governing Board (CoC Board)-** Selected individuals, as defined by the CoC Program Interim Rule, provide leadership to the CoC and engage in other activities designated to them by the CoC (Reference: <https://www.ecfr.gov/current/title-24/part-578/section-578.7>)
- e. **CoC Collaborative Applicant:** Entity designated by the CoC to submit CoC Program Competition Application and to apply for planning funds on behalf of the CoC.
- f. **CoC Lead (CA/CoC Lead):** Entity designated by the CoC which is responsible for coordinating and managing the activities of the CoC.
- g. **Homeless Management Information System (HMIS)-** HMIS is a local information technology system used to collect client-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards. (Reference: <https://www.hudexchange.info/programs/hmis/>)
- h. **HMIS/Data Committee-** A committee of the CoC designed to set policies, oversee the HMIS Lead Agency, and ensure data quality, privacy, and security. The committee handles grievances, reviews agency performance annually, and leads the Point-in-Time Count. (Reference pg. 19: <https://www.guilfordcountync.gov/guilford-county-continuum-care-governance-charter/open>)
- i. **HMIS Lead Agency-** CoC designated eligible entity to manage the HMIS on the CoC's behalf (Reference: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-governance/coc-roles/hmis-lead-agency/>)

- j. **Local System Administrator (LSA)**- A designated local position responsible for managing the CoC's Homeless Management Information System (HMIS). (Reference: <https://www.hudexchange.info/resource/5815/hmis-system-administrator-checklist/>)
- k. **Michigan Coalition Against Homelessness (MCAH)**- operates the HMIS system for the multi-jurisdiction who participates in NC HMIS.
- l. **North Carolina Homeless Management Information System Governance Committee (NC HMIS Governance Committee)**- the governing body for the multi-jurisdictional HMIS implementation in North Carolina in which NC 504 participates. NC HMIS develops the policies and procedures for the multi-jurisdiction must follow.
- m. **System Performance and Evaluation Committee (SPEC)**- This committee sets and reviews performance standards for CoC and ESG-funded projects, develops evaluation tools and dashboards, and recommends improvements for underperforming programs. The committee also ranks funding applications (excluding scoring by applicants) and submits recommendations to the CoC Board and CoC membership for approval. (Reference: <https://www.guilfordcountync.gov/guilford-county-continuum-care-governance-charter/open>)

#### IV. Lead Agency Designation

The CoC designates Guilford County (GC) as the HMIS Lead Agency and the Local System Administrator to manage the identified database at the instruction of the CoC Board and in collaboration with the HMIS/Data Committee. The efforts of the HMIS Lead Agency will be performed in partnership with the CoC Collaborative Applicant/CoC Lead (Guilford County) and the HMIS/Data Committee. Guilford County will serve as both the HMIS Lead Agency and the CoC Collaborative Applicant/CoC Lead. The HMIS Lead Agency is responsible for implementing HMIS in accordance with the NC HMIS Operating Policies and Procedures, Written Standards, NC-504 HMIS Policies and Procedures, this MOU, and HUD Standards and federal regulations specifically 24 CFR § 578.57.

#### V. Internal Controls

##### a. Monitoring HMIS Lead

- i. The System Performance and Evaluation Committee (SPEC) will monitor the HMIS Lead Agency on the grant agreement between HUD and the HMIS Lead Agency, including financial documentation.
- ii. The HMIS/Data Committee will evaluate the HMIS Lead Agency based on the responsibilities within this MOU and how the overall HMIS system functions within the CoC.

##### b. HMIS Lead Agency's Responsibilities for Federal Reporting/CoC grant funding opportunities 24 CFR§ 578.39

- i. To address overall system performance, the HMIS Lead will collaborate with the Collaborative Applicant/CoC Lead Agency for compliance with HUD Annual Requirements for CoC Collaborative Applicant Activities

<https://files.hudexchange.info/resources/documents/HUD-Annual-Requirements-CoC-Collaborative-Applicant-Activities.pdf>

1. The HMIS Lead will submit data for all federal reports to the CA/CoC Lead and the HMIS/Data Committee at the same time for their review and approval prior to submission.
2. The HMIS Lead Agency will provide data that is relevant to the CoC grant funding opportunities on behalf of NC-504 to the CA/CoC Lead.

**c. Access to HMIS System**

- i. The HMIS Lead will grant the CA/CoC Lead appropriate system administrator read-only access as necessary to perform required monitoring duties and responsibilities and limit access to the HMIS system at all other times. The HMIS Lead will notify the HMIS/Data Committee when the system administrator's read-only access is granted for monitoring duties/responsibilities and when it reverts back to the CA/CoC Lead's baseline user role settings. 24 CFR§ 578.7(a)(5).

## **VI. General Understandings**

**a. Funding**

**i. HUD Grants**

HMIS activities are funded in part by the HUD CoC HMIS grant(s). The CoC authorizes the HMIS Lead Agency to apply for and administer CoC HMIS grant funds. The terms and uses of HUD funds are governed by the HUD grant agreement and applicable rules.

**ii. Match**

Where the HUD CoC and ESG grants (if applicable) require a match, GC is responsible for providing the commitment of the required match for HMIS grant(s).

**iii. Fees**

In the absence of government funds, grants, or any other funding covering, or meant to cover, license costs, the HMIS Lead Agency is permitted to charge participating agencies an annual participation fee of no more than the actual, out-of-pocket license cost.

**iv. Incurred Expenses of Transition**

All parties agree that any invoices from MCAH or NCHMIS for expenses incurred from October 1, 2025 through December 31, 2025 will be paid by Guilford County in good faith for expenses incurred during the HMIS Lead transition period. Expenses not to exceed \$25,000.

**b. Local Operational Agreements, Procedures, and Plans**

The CoC has approved policies and procedures in relation to HMIS. Changes to approved agreements, procedures, and plans may be made at the request of GC through the HMIS/Data Committee to comply with HUD HMIS standards or otherwise improve HMIS operations. GC and the HMIS/Data Committee will present updates and changes to the *NC-504 HMIS Policies and Procedures* on an annual basis, or as needed, to the CoC for review and approval. The HMIS policies and procedures must be reviewed annually by the HMIS/Data Committee in collaboration with GC and approved by the CoC. During any such modification periods, all existing HMIS policies and procedures will remain in effect until such time as the CoC approves the changes.

**c. Assignment of Responsibilities**

GC may not assign rights or responsibilities of this MOU, stated below, to any third party without the recommendation of the HMIS/Data Committee and the approval of the CoC Board and CoC as evidenced in the CoC Board and CoC meeting minutes.

**Evaluation of the HMIS Lead Agency**

- d.** HMIS/Data Committee will evaluate the HMIS Lead Agency annually and maintains the right to evaluate more often if the need arises.

**VII. Specific Responsibilities of the Parties**

GC serves as the HMIS Lead Agency for the CoC, managing and administering all local HMIS operations and activities, with the exception of those services provided by the Michigan Coalition Against Homelessness (MCAH) and individual local agencies. GC exercises these responsibilities at the recommendation of the HMIS/Data Committee and the direction of the CoC Board. The HMIS Lead Agency is responsible for monitoring the HMIS system and ensuring that agencies are adhering to all guidance.

To end homelessness, communities must be able to analyze data at both the system and project levels and evaluate their efforts by subpopulation and across project types. Communities must also be able to trust that the data is high quality, presents an accurate picture of the scale and scope of homelessness, and can be used to make decisions related to policy and resource allocation. At the center of this work is the HMIS Lead Agency, the entity that manages the HMIS on behalf of the CoC.

- a.** GC, as the HMIS Lead Agency, is the dedicated HMIS grant recipient, and must develop and maintain a separate detailed annual budget for HMIS financial activities and use a financial reporting system that tracks revenues, program income, match, budget line-item expenditures (license fees/software costs, vendor costs, and staff costs including benefits and a time and activities log, etc.), and current balances of the HMIS grant budget.

- b. GC must ensure that the expenditures of the HMIS project funded with CoC Program funds are documented and eligible in accordance with §578.57 of the CoC Program Interim Rule.
- c. GC should maintain copies of contracts and invoices, including invoices and payment histories of user fees and other budget resources paid directly to GC and MCAH.
- d. **GC agrees to the Following Responsibilities:**
  - i. Manage a single HMIS for the entire CoC's geographic area in compliance with HUD requirements and in compliance with the NC HMIS Annual Contract for Services with MCAH.
  - ii. Ensure that there are dedicated staff for fulfilling HMIS Lead Agency and Local System Administrator responsibilities who are trained at least annually on HUD requirements.
  - iii. GC will assign and maintain, during the term of this Agreement, adequate staff of competent personnel, which may include contractors, that are fully equipped, trained, and qualified to perform the services as both the HMIS Lead Agency and CA/CoC Lead during its tenure as both entities. However, at no time shall the Local System Administrator serve in both capacities during the tenure of this Agreement. GC will also ensure that in addition to the Local System Administrator, any staff assigned to work as part of the HMIS Lead Agency responsibilities will prioritize HMIS Lead Agency work over any other assigned duties to GC except in times where a State of Emergency has been issued by Guilford County.
  - iv. Ensure recipient and sub-recipient participation in HMIS, as required by the funding source, facilitate HMIS participation, and oversee data accuracy and completeness.
  - v. Ensure all reports (Longitudinal System Analysis, PIT/HIC, SPM, other HUD required reports) are reviewed and approved by the CoC Board and or designee (HMIS/Data Committee) and the CA/CoC Lead prior to submission.
  - vi. Adhere to, review, and update *NC-504 HMIS Policies and Procedures* at least annually to ensure compliance with HUD standards, HMIS privacy, security, data quality plans, *NC HMIS Operating Policies and Procedures*, and NC-504 Governance Charter
  - vii. Work with the CoC Board and Committees, HMIS/Data committee, SPEC committee, and Workgroups to support HMIS data use for project monitoring, program development and expanding programs.
  - viii. Collaborate with the HMIS/Data Committee on annual evaluation activities of the HMIS Lead Agency and more often if the need arises.
  - ix. HMIS Lead Agency will comply with all federal and state regulations and laws related to confidentiality of any and all documents or systems it has access to as the HMIS Lead Agency. HMIS Lead Agency will not release any information collected as the HMIS Lead Agency, except as required for HUD purposes, or as authorized/required by law.
  - x. The HMIS Lead Agency is a non-voting/ex-officio member of the HMIS/Data Committee and HMIS Lead Agency staff will not be involved in the evaluation of the HMIS Lead Agency.

#### **xi. Technical Support**

1. Provide front-line technical support and assistance for users and agencies within the CoC. This support includes resetting passwords and providing troubleshooting and problem-solving, training Agency Administrators to do fundamental system support activities, facilitating technical assistance tickets to the MCAH help desk, and ensuring communication process for the lifespan of the ticket.
2. Build relationships with the agencies within the CoC network, working to understand the business practices of these agencies and assisting them with mapping their business practices onto the HMIS system.
3. Work with the CoC to best implement CoC operations on the HMIS system. This may include custom workflows, reporting, and data-sharing configurations.

#### **xii. User Accounts**

1. Set up new users in HMIS and issue the appropriate licenses after verifying training completion. Supervise HMIS license allocation for users and agencies and oversee the process of purchasing additional HMIS licenses directly for the CoC per the purchase protocol defined by the NC HMIS Governance Committee.

#### **xiii. Provider Page Set-up and Visibility Configuration**

1. Work in partnership with the agencies and Agency Administrators to ensure that agency provider pages are set up correctly, per HUD Data Standards requirements, as programmed in the HMIS system.
2. Work in partnership with local agencies and Agency Administrators to verify the visibility of provider pages regularly to ensure visibility aligns with the NC HMIS project guidelines and any Sharing Qualified Services Organization Business Associates Agreements (QSOBAAs).
  - a. With internal visibility, ensure data is shared locally between all the agency's projects, and as may be required by other federal or state laws.
  - b. With external, or multi-agency sharing, ensure the sharing protocol aligns with any external Sharing QSOBAAs.
  - c. When setting up data visibility for a single agency across CoCs, GC will ensure the appropriate visibility groups are established by MCAH staff, whereupon GC or local agency staff will apply those groups to provider pages.
  - d. Conduct provider page audits to ensure visibility is properly set by the requirements identified in the *NC HMIS Operational Policies and*

*Procedures*, and additional audit procedures may be defined and approved by the CoC.

**xiv. Communication**

1. Attend the monthly NC HMIS Local System Administrator Meeting hosted by MCAH
2. Host regular User/Agency Administrator meetings for system users. These meetings will cover important news on system changes, items of local interest within the CoC, and data issues identified by GC.
3. Share news items of relevance to the users and Agency Administrators, including but not limited to important updates on system changes, system downtime, or other relevant system news shared by MCAH to GC.

Offer monthly opportunities for Users and Agency Administrators to receive support and share feedback, including—but not limited to— meetings, trainings, and open office hours. GC will track attendance to ensure consistent representation from each HMIS-participating agency.

**xv. Training**

1. Inform Agency Administrators and end users of required and recommended system training available through the MCAH training website.
2. Verifying that system users have completed all required training for system participation.
3. Create and provide input/training to CoC users for customized workflows and activities used within the CoC, including but not limited to: PIT/HIC training or other HUD-required activities, data cleanup, or proper workflow and system usage that are identified in an audit process
4. Provide training for local users/agency administrators on initiatives identified and agreed upon between GC and the CoC. This includes but is not limited to customized training around data collection, reporting, and analysis for:
  - a. PIT/HIC
  - b. System Performance Measures (SPM)
  - c. Custom evaluation projects
  - d. Agency-level data quality and outcome reports

**xvi. HUD Projects and Activities of the HMIS Lead Agency:**

1. Longitudinal System Analysis: Support the submission of the Longitudinal System Analysis for the CoC. This includes supervising data cleanup, working with CoC agencies, and the assigned HUD representative/Technical Assistance (TA) to ensure the submission is complete and accurate.



2. Provide PIT and HIC reports to the CoC Board, the HMIS/Data Committee, and the CA/CoC Lead for review and approval prior to submission.
3. Point in Time Count (PIT)/Housing Inventory Count (HIC): Support the PIT/HIC submission for the CoC. This effort includes coordinating work with local planning bodies, local agencies, and community volunteers to ensure appropriate data is collected, conducting analysis of data to align with HUD PIT/HIC guidance, and ensuring that the Bed/Unit Inventories for each project within the CoC is correct. Collect information from non-HMIS participating agencies as required by HUD, including Victim Service Providers. This will include on-site participation in the annual PIT count by HMIS Lead Agency staff. Provide PIT and HIC reports to the CoC Board or designated committee for review and approval prior to submission.
4. HMIS Annual Performance Report (APR): Complete the HMIS APR for submission to HUD. This will include conducting proper data review and cleanup, ensuring the report is accurate, and, if needed, requesting systemwide HMIS statistics from the MCAH staff.
5. Support the submission of the System Performance Measures (SPM) for the CoC. This includes supervising data clean-up and ensuring the submission is complete and accurate. Provide the SPM report to the CoC Board, CA/CoC Lead, and the HMIS/Data Committee for review and approval prior to submission.
6. CoC APR: Provide support/technical assistance for agencies completing the CoC APR. This will include providing technical assistance with problem-solving data quality issues, reporting issues, etc.
7. ESG Consolidated Annual Performance and Evaluation Report (CAPER): Provide support to agencies to complete the annual ESG CAPER.

**xvii. CoC Reporting**

1. Provide reports to the CoC, including but not limited to:
  - a. CoC wide demographics, performance outcomes, and data quality reports that are used for informational and evaluation purposes.
  - b. Final reports on submissions made to HUD for various HUD-mandated activities such as the PIT/HIC, HMIS APR, Longitudinal System Analysis, and SPM.
  - c. General requests for data of interest approved by the CoC.
  - d. Any additional reporting requirements initiated by HUD that are required of the CoC.
2. Report on activities and expenditures related to the NCHMIS Governance Committee to the CoC Board and HMIS/Data Committee.

3. Build and maintain local reporting groups for reporting projects as requested by the NC HMIS Governance Committee.
4. Must get approval from HMIS/Data committee at least 48 hours before due date for any submission of Longitudinal System Analysis, PIT/HIC, and any other report required.
5. Must get approval from the HMIS/Data committee and board to release data outside to other parties (even if they are current CoC members).
6. Must get approval from HMIS/Data committee for new HMIS user agencies prior to being awarded licenses and approved to use the system.
7. Must get approval from HMIS/Data committee before creating and sharing a “data dashboard”.
8. Must report monthly to HMIS/Data committee regarding:
  - a. Participating HMIS Agencies and CoC data quality.
  - b. Participating HMIS Agencies and CoC data accuracy and completeness.
  - c. Report monthly on pending/completed service requests.
  - d. Attendance during HMIS User Meetings, HMIS trainings, and Office hours.
  - e. Report the number of help desk emails/tickets submitted to MCAH for the month.
  - f. Ongoing training and capacity building activities as HMIS Lead Agency.
  - g. HMIS user agencies added, and licenses provisioned within that month.
9. Must get approval from HMIS/Data committee before implementing and requiring new documents/documentation from participating CoC agencies, unless required by HUD, NC HMIS, ESG, etc.
10. Report to HMIS/Data committee at the next meeting any non-compliance from participating agencies and allow the committee to vote and approve disciplinary plan and action. If the compliance concern is urgent, HMIS Lead Agency will send an email to call a meeting.
11. Report to HMIS/Data committee concerning any findings concerning HMIS usage within 48 business hours of identifying the concern.
12. Provide the HMIS/Data Committee with updates from the NC HMIS Governance Committee meetings.
13. When advanced notice is given to the CoC representative, the CoC representative will inform the HMIS/Data Committee prior to voting on behalf of NC-504 during NC HMIS Governance Committee meetings. The HMIS Lead Agency will provide an after-action update within two business days of the meeting with any actions taken during the NC HMIS Governance Committee meetings.
14. Disclose any consultants that are working on behalf of the CoC to the CoC Board.
15. Where conferences are attended, reporting updates and suggestions obtained to the HMIS/Data Committee.

16. Ensuring approval of the HMIS/Data Committee before presenting on behalf of the CoC about any matters pertaining to HMIS publicly (including meetings with elected officials and/or at conferences) for CoC purposes only.
17. On an annual basis, provide the HMIS/Data Committee with the training schedule (including topics), office hours schedule, provider page audit, and any recommended changes to the HMIS Policies and Procedures with justifications.

**xviii. Auditing and NC HMIS Compliance**

1. Audit agencies and projects to ensure compliance. Audit activities will include, but not be limited to:
  - a. Ensuring the participating HMIS agency has all required contracts, agreements, and policies in place for participation in the HMIS.
  - b. Verifying that system users have completed all required training for system participation.
  - c. Ensuring the participating HMIS provider pages are correctly set up, per HUD Standards Guidance.
  - d. Ensuring agencies are following appropriate data entry protocols per the funding sources.
  - e. Monitoring implementation of privacy, to ensure client rights are being protected. This includes checking to ensure the Releases of Information are current and align with the level of sharing taking place in the CoC.
  - f. Regularly monitoring data quality, completeness, and outcomes to ensure projects maintain compliance with HUD and CoC data requirements.
  - g. Complete an audit of participating HMIS agencies on an annual basis.
  - h. Submit monthly data error reports with supporting documentation to HMIS participating agencies.
2. Report audit findings to the HMIS/Data Committee and SPEC.
3. HMIS/Data Committee will evaluate the HMIS Lead Agency annually and maintains the right to evaluate more often if the need arises.
4. Collaborate with CoC to achieve strategic plan goals as they relate to HMIS.
5. Ensure access to HMIS is limited to agencies with a “need-to-know” business purpose (per HUD/MCAH regulations).
6. Work with CoC stakeholders to improve data accuracy and completeness scores for all participating HMIS agencies in accordance with HMIS policy and procedures and the CoC written standards.

**VIII. Failure to Adhere to the MOU**

Failure to adhere to this MOU may result in the institution of a performance improvement plan and/or termination of the HMIS Lead Agency designation and MOU.

#### **IX. Termination of MOU**

Either party may terminate this MOU at a date prior to the renewal date specified in this MOU by giving one hundred eighty (180) days written notice to the other party. If the funds relied upon to undertake activities described in this MOU are withdrawn or reduced, or if additional conditions are placed on such funding, any party may terminate this MOU within thirty (30) days by providing written notice to the other parties. The termination shall be effective on the date specified in the notice of termination.

If termination of this MOU occurs prior to its annual renewal and/or an award through a competitive process by either party and in accordance with the terms of the HMIS Lead Agency contract with HUD, HMIS grant monies will be transferred to a new HMIS Lead Agency proportionate to the remaining time in the contract at the point where GC concludes HMIS services and transfers HMIS Lead Agency responsibilities to a new HMIS Lead Agency.

#### **X. Amendments/Notices**

This MOU may be amended in writing by either party. Notices shall be mailed or delivered to the CoC Board Chair and the County Manager of Guilford County.

The Parties hereto have caused this Memorandum of Understanding to be executed by their duly authorized representatives and signed under seal, effective as of the date first written above.

#### **Signatures**

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

HMIS Lead Agency Representative: \_\_\_\_\_

Title: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

CoC Board Chair Representative: \_\_\_\_\_

Title: \_\_\_\_\_

CC: HMIS/Data Committee