Overview of Governance Documents

*“Governance is the structure and method of overseeing and managing/operating something.”*

In essence, there are 3 different "governance" documents that help to define how the CoC and HMIS operate:

1. The CoC Governance Charter, which is referenced in the CoC Interim Rule. It focuses on how the CoC is operated. It outlines the decision making and committee structure of the CoC. It describes the Board, its operating procedures, and the CoC structure and its operating procedures. A CoC may already have some of this structure in place, through existing by-laws and committees. A CoC Governance charter may have a policy on uses of data and the decision-making structure around requests for data and the publication of CoC-wide reporting. In addition to the CoC operation requirements, the CoC Governance Charter needs to include language on HMIS governance or reference a HMIS Governance Charter. At a minimum, the CoC Governance Charter must have written statements and policies that cover the following:  
   1. Designate a single Homeless Management Information System (HMIS) for the geographic area;
   2. Designate an eligible applicant to manage the Continuum's HMIS, which will be known as the HMIS Lead;
   3. A policy to review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS as well as have a written procedure for doing so;
   4. A policy around CoC expectations for agency participation in HMIS and a written procedure to ensure consistent participation of recipients and subrecipients in the HMIS; and
   5. A policy around how the CoC will ensure the HMIS is administered in compliance with requirements prescribed by HUD including a written procedure for doing so.
2. The HMIS Governance Charter (also known as the Memorandum of Understanding) which is referenced in the CoC Interim Rule, but is more specifically referenced in the pending HMIS Regulations. It focuses on how the HMIS is managed by the CoC (or if sharing a single HMIS, how the HMIS is managed jointly by the CoCs). Like the CoC Governance Charter, it outlines the structure and decision-making processes regarding the HMIS, but also includes sections outlining the roles and responsibilities regarding HMIS for the CoCs, the HMIS Lead, an HMIS governance or steering committee, the CHOs (participating agencies) and the end users. The HMIS Governance Charter ***supports*** the HMIS Contract for Services, but is reasonably general in nature and makes sure everyone knows who does what in the broader management of the HMIS. It is NOT a legally binding document.
3. The HMIS Contract for Services. This IS a legally binding document between the CoC and the HMIS lead agency and is the one that says "this is what the HMIS Lead Agency will do for payment". The CoC and HMIS Governance documents support and have similar language as the contract for services.