



Orange CoC HMIS User Meeting

June 2019



**NC COALITION^{to}
HOMELESSNESS**

Agenda

System Updates:

NCCEH Website Changes

HMIS Data Collection Forms

Privacy Documentation

Questions, Concerns, Feedback

What's Next Calendar:

July HMIS Users Meeting



NCCEH

To-Do Checklist: Agency

- ☐ **Post HMIS Privacy Signs** **June 6**
Post copies of the [HMIS Privacy Sign](#) in location where clients can clearly see them, especially in places where assessments and other data gathering are done.

- ☐ **Implement New Privacy Notice** **June 6**
Distribute and discuss the HMIS Privacy Notice. This notice should be available to clients upon request. You can use the template provided by NCCEH or customize it to include additional information.

If you choose to use the template, be sure to fill in your agency information in the blanks of this [fillable pdf available for download here](#). If you customize it, be sure to view the Privacy Policy requirements in Section IIIA of the HMIS@NCCEH Operating Policies and Procedures.

- ☐ **Implement New Release of Information** **June 6**
Prepare staff with copies of the new Release of Information. Be sure to fill in the blank for your agency name before printing after [downloading here](#)!

Ensure staff and volunteers can explain it to a client. Use this [sample script](#) to assist.

To-Do Checklist: HMIS User

- ☐ **Complete HMIS@NCCEH Privacy Training** **June 30**
[Watch the webinar and complete a quiz.](#) This training is essential for understanding important changes to our privacy policies. We've streamlined documents and made updates to allow for coordination of services on the client's behalf outside of HMIS.
- ☐ **Complete HMIS@NCCEH Orientation Training** **June 30**
[Watch the webinar and complete a quiz.](#) This training will provide an overview of what to expect from HMIS@NCCEH and highlights key changes.
- ☐ **Roll Out Privacy + Assessment Changes** **June 6**
Ensure all staff have the new privacy and assessment documents and are ready to use them. Go ahead and recycle the NC HMIS forms to avoid confusion.
- ☐ **Sign User Agreement + Ethical Standards** **June 30**
View a sample of the agreement [here](#). You may want to watch the [Launch Orientation](#) and [Privacy](#) Training Webinars before signing the agreement as they provide additional explanation of the agreement terms. Watch your email to sign the agreement via DocuSign.

NCCEH.org

Walk-through of resources and assessments




NCCEH

The background of the entire slide is a repeating pattern of various building icons. These icons include houses, apartment buildings, skyscrapers, and industrial structures, all rendered in a light blue, line-art style. They are scattered across the entire background, creating a textured, urban feel.

Definition of Common Terms

Common Terms

Term	Acronym	Definition
Continuum(s) of Care	CoC	Planning body charged with guiding the local response to homelessness. The CoC is responsible for designating the HMIS Lead Agency to operate HMIS and participating in the structures (Advisory Committee) to oversee effective operations of HMIS.
Homeless Management Information System	HMIS	A data system that meets HUD's HMIS requirements and is used to measure homelessness and the effectiveness of related service delivery systems. The HMIS is also the primary reporting tool for HUD homeless service grants as well as for other public streams of funding related to homelessness.
HMIS@NCCEH	HMIS	The HMIS implementation for Durham, NC Balance of State, and Orange Continuums of Care. HMIS@NCCEH is operated by the North Carolina Coalition to End Homelessness. https://www.ncceh.org/hmis/about/
Personally Identifying Information	PII	Personally Identifiable Information is a category of sensitive information that is associated with an individual. It should be accessed only on a strict need-to-know basis and handled and stored with care.
ServicePoint	SP	HMIS Software developed and managed our vendor, WellSky, to fulfill HUD's HMIS requirements.



Defining Privacy, Security, and Consent

Principles

Confidentiality / Need to Know

Choice / Consent

Right to Refuse

Balance

More disclosure, More risk



“Security standards, as provided in this section, are directed to ensure the confidentiality, integrity, and availability of all HMIS information; protect against any reasonably anticipated threats or hazards to security; and ensure compliance by end users”

HMIS Security Standards via HUD [§ 580.35](#)



NCCEH

HIPAA

HIPAA covered entities have additional requirements and procedures



NCCEH

The background of the image is a solid teal color with a repeating pattern of white line-art icons. These icons represent various types of buildings, including houses, multi-story apartment buildings, and industrial structures, as well as some trees. The pattern is dense and covers the entire background.

Documents and Tools

Documents and Tools

Follow along with your own copy of the following Documents and Tools by visiting: **ncceh.org/hmis/admin**



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HMIS Privacy Sign

Agencies must post the HMIS Privacy Sign at the intake or comparable location, with general reasons for data collection and reference to the privacy policy.

We collect personal information about people we serve in a computer database called the Homeless Management Information System (HMIS). The information we collect helps us run programs, improve services, and better understand your needs. Some of the information we collect may be required by organizations that fund the operation of this program. We only collect information that is needed or required.

Some of your information may be shared with other organizations to coordinate referrals, housing, or services. Those other organizations also have privacy policies to protect your personal information. You have the right to tell us we should not make your information that is entered into the database visible to other agencies in HMIS.

If you have any questions or would like to see our privacy notice, please ask one of our staff.

HMIS/PMIS/CEH 1-01-2018

HMIS Privacy Sign

“We collect personal information directly from you for reasons that are discussed in our Privacy Notice. We may be required to collect some personal information by law or by organizations that give us money to operate this program. The personal information we collect is important to run our programs, to improve services for persons experiencing homelessness, and to better understand the needs of persons experiencing homelessness. We only collect information that we consider to be appropriate.”

HMIS Privacy Sign

"...Some of your information may be shared with other organizations to coordinate referrals, housing, or services. Those other organizations also have privacy policies to protect your personal information. You have the right to tell us we should not make your information that is entered into the database visible to other agencies in HMIS.

If you have any questions or would like to see our privacy notice, please ask one of our staff."

HMIS@NCCEH Privacy Notice

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PRIVACY NOTICE

THIS NOTICE DESCRIBES HOW YOUR PERSONAL INFORMATION MAY BE USED/DISCLOSED, AND HOW YOU MAY OBTAIN ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

This Notice describes the privacy practices of [AGENCY] with respect to our use of the Homeless Management Information System administered by North Carolina Coalition to End Homelessness ("HMIS").

HMIS: We participate in a regional system that allows shelters and other homeless service providers to share information about the people we serve. HMIS keeps information about clients that get help in each participating agency to better assist you.

Through HMIS, we and other agencies can share your name, year of birth, age, gender, veteran status, and partial SSN without your permission (your "Standard Information"), unless you indicate on the HMIS Release Form that you do not want your Standard Information to be visible or tell an agency to close your "Profile/Name." We and the other agencies can collect, use and share any additional information you consent to share when you fill out the HMIS Client Release of Information (ROI). This Notice informs you as to how we and HMIS treat the personal information we collect, use, and share with other agencies.

Personal and Health Information: When you receive services from us, we share your Standard Information on HMIS with other agencies, unless you tell us not to as provided above. If you choose to sign the ROI, we will also share your information, which may include personal health information and information about your race, ethnicity, disabling conditions, previous residence history, employment history, substance abuse, sexual orientation, educational history and more. Your Standard Information

HMIS@NCCEH Privacy Notice

Actions for Agencies

- ☐ Insert your Agency Name

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HMIS@NCCEH Privacy Notice

Actions for Agencies

- ☐ Identify your Agency Contact Person

You have the right to obtain a paper copy of our Notice at any time upon request.

Contact Person: To make a complaint or ask a question about our privacy practices, contact:








Effective Date: The effective date of this Notice is _____.




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HMIS@NCCEH Privacy Notice

Standard Information

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HMIS@NCCEH Privacy Notice

Standard Information









Client details visible for search and deduplication purposes:




- Full Name
- Year of birth
- Age
- Gender
- Veteran Status
- Partial Social Security Number



HMIS@NCCEH Privacy Notice

Allowable Uses

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Personal and Health Information: When you receive services from us, we share your Standard Information on HMIS with other agencies, unless you tell us not to as provided above. If you choose to sign the ROI, we will also share your information, which may include personal health information and information about your race, ethnicity, disabling conditions, previous residence history, employment history, substance abuse, sexual orientation, educational history and more. Your Standard Information and any information you release in your ROI is referred to as your “Personally Identifiable Information.” This information will be visible in HMIS and may also be exchanged on paper, verbally or electronically based on uses and disclosures below.

How We May Use and Disclose Your Personally Identifiable Information: We may use and disclose your Personally Identifiable Information only for the following purposes:

- (1) to provide or coordinate services on behalf of an individual or household;
- (2) for functions related to payment or reimbursement for services;
- (3) to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions; or
- (4) for creating de-identified Personally Identifying Information.

Other Uses and Disclosures: We may use or disclose your Personally Identifying Information for other reasons, even without your permission. Subject to applicable federal or state law, we are

HMIS@NCCEH Privacy Notice

Allowable Uses

We may use and disclose your Personally Identifiable Information only for the following purposes:

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HMIS@NCCEH Privacy Notice

Client info should be used for:

- Completing enrollments and assessments for clients served by the agency
- Referring clients to other services and/or agencies
- Creating case notes and tracking client progress
- Coordinating services for a client



HMIS@NCCEH Privacy Notice

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- Completing enrollments and assessments for clients served by the agency
- Referring clients to other services and/or agencies
- Creating case notes and tracking client progress
- Coordinating services for a client

Client info should not be used for:

- Personal gain
- Bias opinions
- Fraud
- Stalking
- Sharing with others outside of services providers
- Curiosity



HMIS@NCCEH Privacy Notice

Allowable Disclosures

The screenshot shows a Microsoft Word document with the title bar 'HMIS@NCCEH_Privacy_Notice 2.27.19 - Saved to this PC' and the user name 'Andrea Carey'. The ribbon includes 'File', 'Home', 'Insert', 'Design', 'Layout', 'References', 'Mailings', 'Review', 'View', 'Help', and a search bar. On the right, there are 'Share' and 'Comments' buttons. The document content is as follows:

Other Uses and Disclosures: We may use or disclose your Personally Identifying Information for other reasons, even without your permission. Subject to applicable federal or state law, we are permitted to disclose your Personally Identifying Information without your permission for the following purposes:

- *Required by Law:* We may use/disclose your Personally Identifying Information when such use/disclosure is required by law, subject to the requirements of such law.
- *Serious threat to health or safety:* We may use and disclose your Personally Identifying Information when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

HMIS@NCCEH Privacy Notice

Allowable Disclosures

1. Required by Law
 - Agencies participating in HMIS must comply with federal, state, and local confidentiality laws
2. Serious threat to health or safety
3. Abuse, Neglect or Domestic Violence
4. Research
5. Law enforcement purposes
6. Other: Even if you agree or do not object, however, the foregoing uses/disclosures may also be limited by certain North Carolina laws governing pharmacy, mental health facility or nursing facility records, or records related to controlled substance abuse and communicable diseases

HMIS@NCCEH Privacy Notice

Authorized Use and Disclosure

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- *Law enforcement purposes:* Subject to certain restrictions, we may disclose your Personally Identifying Information under certain circumstances.
- Even if you agree or do not object, however, the foregoing uses/disclosures may also be limited by certain North Carolina laws governing pharmacy, mental health facility or nursing facility records, or records related to controlled substance abuse and communicable diseases.

Authorization to Use or Disclose Your Personally Identifying Information: In any situations other than those where your permission is not required, as described above, we will ask for your written authorization before using or disclosing your Personally Identifying Information, which you may do or have already done by signing an ROI. If you choose to sign an ROI to disclose your Personally Identifying Information, you can later revoke that authorization to stop any future uses and disclosures. However, you cannot revoke your authorization for uses and disclosures that we have made in reliance upon such authorization.

Destruction or De-Identificatin of Your Personally Identifying Information: We will dispose of or, in the alternative, remove identifiers from, Personally Identifying Information that is not in current use seven years after your Personally Identifying Information was created or last changed, unless a statutory, regulatory, contractual, or other requirement mandates we keep it longer.

Individual Rights: You have the following rights with regard to your Personally Identifying Information. Please contact the person listed below to obtain the appropriate forms for exercising these rights.

Request Restrictions: You may request restrictions on uses and disclosures of your Personally Identifying Information, unless such restriction is inconsistent with our legal requirements. We are not

HMIS@NCCEH Privacy Notice

Authorized Use and Disclosure

For anything beyond the list of Allowable Uses and Disclosure, Agencies must ask for written authorization from the client.

HMIS@NCCEH Privacy Notice

Destruction or De-Identification of Historic Data

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Authorization to Use or Disclose Your Personally Identifying Information: In any situations other than those where your permission is not required, as described above, we will ask for your written authorization before using or disclosing your Personally Identifying Information, which you may do or have already done by signing an ROI. If you choose to sign an ROI to disclose your Personally Identifying Information, you can later revoke that authorization to stop any future uses and disclosures. However, you cannot revoke your authorization for uses and disclosures that we have made in reliance upon such authorization.

Destruction or De-Identification of Your Personally Identifying Information: We will dispose of or, in the alternative, remove identifiers from, Personally Identifying Information that is not in current use seven years after your Personally Identifying Information was created or last changed, unless a statutory, regulatory, contractual, or other requirement mandates we keep it longer.

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HMIS@NCCEH Privacy Notice

Destruction or De-Identification of Historic Data

HUD requirement fulfilled by NCCEH as HMIS Lead Agency

- Client information inactive after seven years must be disposed of



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Individual Rights of Clients

To be reviewed in the Release of Information portion



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Changes to Privacy Notice

HUD strongly recommends this language is included.

Acknowledges that privacy policies may change and still apply to clients

Changes in Privacy Practices: We reserve the right to change our privacy policies and the terms of this Notice at any time and to make the new policies and provisions effective for all Personally Identifying Information, even with respect to the information processed before the amendment.

You have the right to obtain a paper copy of our Notice at any time upon request.








Contact Person: To make a complaint or ask a question about our privacy practices, contact:




Effective Date: The effective date of this Notice is _____.

HMIS@NCCEH Privacy Notice

- All staff within an agency using HMIS must have read and understood the Privacy Notice
- Staff must provide the Privacy Notice to the client upon request and explain it

HMIS@NCCEH Release of Information

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HMIS CLIENT RELEASE OF INFORMATION

Last Name:	First Name:	Middle Initial:
Agency Name:	Date of Birth:	Date of Assessment:

Introduction: Protecting your information is important to us. This document outlines how we use and protect your information. Many North Carolina shelters and helping programs use the Homeless Management Information System managed by North Carolina Coalition to End Homelessness (HMIS) to keep information about people they help. This form defines which client data is entered into HMIS and how those data are shared between agencies. In addition, a coordinating group is a locally created group that meets regularly to identify homeless persons and develop strategies for housing them. A full list of the participating providers in this area can be found at ncceh.org/hmis/clientconsent.

The included agencies will collect personal information directly from you and your household to determine your eligibility for services and connect you with other helping agencies. **Agencies only collect personal information that is considered appropriate for getting you housed.** The collection and use of all personal information is guided by strict standards of confidentiality.

We will only use your information to benefit you in the following ways:

- To provide or coordinate services on behalf of an individual or household;
- For payment or reimbursement for services;
- To carry out administrative functions, including but not limited to oversight and management functions; or
- For creating summary reports without identifying you or confusing you with someone else

SECTION 1 – HMIS Standard Information

HMIS@NCCEH Release of Information

Actions for Agencies

- ❑ Fill in your Agency Name before printing







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HMIS@NCCEH Release of Information

Introduction

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HMIS@NCCEH Release of Information

Introduction

"This document outlines how we use and protect your information ... Agencies only collect information that is considered appropriate for getting you housed."



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HMIS@NCCEH Release of Information

Allowable Uses:

- To provide or coordinate services on behalf of an individual or household;
- For payment or reimbursement for services;
- To carry out administrative functions, including but not limited to oversight and management functions; or
- For creating summary reports without identifying you or confusing you with someone else

HMIS@NCCEH Release of Information

What's Allowed with Who?

Sharing Data within your Agency

- Agencies may infer consent for uses in the posted Privacy Notice and written Policies and Procedures.

HMIS@NCCEH Release of Information

What's Allowed with Who?

Sharing Data within your Agency

- Agencies may infer consent for uses in the posted Privacy Notice and written privacy policy.

Consent to visibility in HMIS but outside of your Agency

- Section 1 - Standard Information (Profile info shared for search)
- Section 2 - HMIS Data Visibility within Coordinating Group

HMIS@NCCEH Release of Information

What's Allowed with Who?

Sharing Data within your Agency

- Agencies may infer consent for uses in the posted Privacy Notice and written privacy policy.

Consent to visibility in HMIS but outside of your Agency

- Section 1 - Standard Information
- Section 2 - HMIS Data Visibility within Coordinating Group

Consent to share outside of HMIS and outside of your Agency

- Section 3 - Coordinating Group

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Consent to visibility in HMIS but outside of your Agency

Section 1: Standard Information

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- To carry out administrative functions, including but not limited to oversight and management functions; or
- For creating summary reports without identifying you or confusing you with someone else

SECTION 1 – HMIS Standard Information

Standard information can be seen by all North Carolina agencies that use HMIS. This information allows us to select the correct record and to better coordinate services for you. All persons using HMIS are trained and certified in privacy.

What information is shared about you in HMIS?

- Name
- Age / Year of birth
- Veteran status
- Gender
- Partial social security number

If you have a privacy concern you can ask to close this information so that only our Agency can see this information.

SECTION 2 – HMIS Data Visibility

Our agency has agreed to share information on clients in HMIS with other agencies. This means that your information will be visible to users from those other agencies in HMIS. A list of agencies we share with can be found by looking up our agency name at: ncceh.org/hmis/clientconsent.

What information is shared about you in HMIS with these other agencies?

HMIS@NCCEH Release of Information

Consent to visibility in HMIS but outside of your Agency

Section 1: Standard Information

Client details visible for search and deduplication purposes:

- Name
- Age / Year of birth
- Gender
- Veteran Status
- Partial Social Security Number



HMIS@NCCEH Release of Information

Consent to visibility in HMIS but outside of your Agency

Section 2: HMIS Data Visibility

The screenshot shows a Microsoft Word document with a blue header bar. The title bar reads 'HMIS Client Release of Information 4.5.19' and the author is 'Andrea Carey'. The ribbon includes 'File', 'Home', 'Insert', 'Design', 'Layout', 'References', 'Mailings', 'Review', 'View', 'Help', and a search icon. On the right, there are 'Share' and 'Comments' buttons. The document content includes a privacy notice, Section 2: HMIS Data Visibility, and Section 3: Coordinating Group.

If you have a privacy concern you can ask to close this information so that only our Agency can see this information.

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What information is shared about you in HMIS with these other agencies?

- Demographic information (e.g. race, veteran)
- Income and benefit information
- Disability information
- Program enrollment, needs and services
- Homeless history
- Domestic violence status
- Housing assessment (e.g. VI-SPDAT)

SECTION 3 – Coordinating Group

Our agency shares information with several agencies thorough a local coordinating group, designed to coordinate care for you. This means that your information may be discussed verbally, in writing, electronically, or in documents downloaded from HMIS. A list of agencies in this coordinating group may be found by looking up our agency name at: ncceh.org/hmis/clientconsent.

Information possibly included in case conferencing:

- Demographic information (e.g. race, veteran)
- Income and benefit information
- Disability information
- Coordinated entry notes
- Homeless history
- Domestic violence status

HMIS@NCCEH Release of Information

Consent to visibility in HMIS but outside of your Agency

Section 2: HMIS Data Visibility

Additional information is visible in HMIS according to agency agreements.

Examples:

- Regional sharing groups
- Coordinated Entry sharing groups
- Special population sharing groups (Vets, Chronic Homelessness)

Agencies included in HMIS Data Visibility groups can be found at ncceh.org/hmis/clientconsent.



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HMIS@NCCEH Release of Information

Consent to visibility in HMIS but outside of your Agency

Section 2: HMIS Data Visibility

What information in HMIS is visible for these agencies?

- Demographic information (e.g. race, veteran)
- Income and benefit information
- Disability information
- Program enrollment, needs and services
- Homeless history
- Domestic violence status
- Housing assessment (e.g. VI-SPDAT)



HMIS@NCCEH Release of Information

Consent to share outside of HMIS and outside of your Agency

Section 3 - Coordination of Services

The screenshot shows a Microsoft Word document titled "HMIS Client Release of Information 4.5.19" with the author "Andrea Carey". The document content is as follows:

What information is shared about you in HMIS with these other agencies?

- Demographic information (e.g. race, veteran)
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- Income and benefit information
- Disability information
- Program enrollment, needs and services
- Coordinated entry notes
- Homeless history
- Domestic violence status
- Housing assessment (e.g. VI-SPDAT)

Your Rights:

HMIS@NCCEH Release of Information

Consent to share outside of HMIS and outside of your Agency

Section 3 - Coordination of Services

- This means that client information may be discussed verbally, in writing, electronically, or in documents downloaded from HMIS.
- Use and disclose information to identify appropriate resources and services.
- Use and disclose information to determine participant prioritization for housing.
- Use and disclose information to make referrals.
- Use and disclose information to determine participant progress.

Agencies included in Coordinating Groups can be found at ncceh.org/hmis/clientconsent.

HMIS@NCCEH Release of Information

Consent to share outside of HMIS and outside of your Agency

Section 3 – Coordinating Group

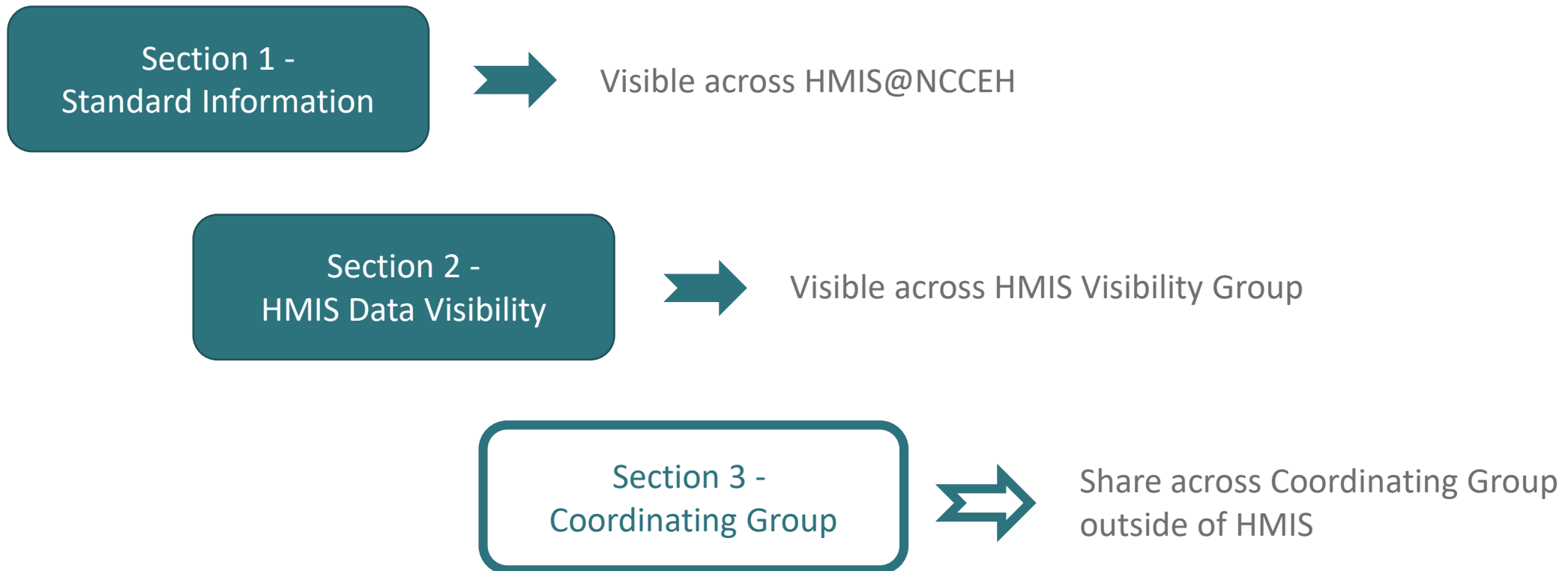
What information possibly shared with these agencies?

- Demographic information (e.g. race, veteran)
- Income and benefit information
- Disability information
- Program enrollment, needs and services
- Homeless history
- Domestic violence status
- Housing assessment (e.g. VI-SPDAT)
- **And Coordinated Entry notes**



HMIS@NCCEH Release of Information

Three sections extend Consent over more data to more partners



HMIS@NCCEH Release of Information

Individual Client Rights

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Your Rights:

- Your refusal to share information in this system will not be used to deny you services such as emergency assistance, outreach, shelter, or housing assistance.
- Any information you provide related to race, color, religion, sex, national origin, disability, familial status, and actual or perceived sexual orientation, gender identity, or marital status will not be used in any way that would discriminate against you or prevent you from receiving services or housing assistance. You have the right to file a complaint if you feel that you have been discriminated against
- You may request a copy of this agency's Privacy Notice that explains HMIS and your rights and responsibilities associated with how information is kept and shared through this system.
- You have the right to see your information, request to change it, and to have a copy of that information from the servicing agency by written request. An agency can refuse to change information in your record but must provide you with a written explanation of the refusal within 60 days of the request. Agencies are allowed to charge for reproducing a record.
- You may withdraw your consent to share at any time by writing to the staff identified in our Agency Privacy Notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.
- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 (HIPPA), 45 CRF, Parts 160 & 164) and certain North Carolina laws.

HMIS@NCCEH Release of Information







Individual Client Rights




- Right to Refuse
- Right to Not Be Discriminated Against
- Right to Our Policies
- Right to Your Information
- Right to Withdraw Consent
- Right to Confidentiality



HMIS@NCCEH Release of Information


Client Consent

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notice. However, any information already shared with another agency cannot be taken back. Your request to discontinue sharing will have to be coordinated between sharing partners. You should tell each agency that you work with when you withdraw your consent.

- The confidentiality of your records is protected by law. This agency will never give information about you to anyone outside the agency without your specific written consent through this release or as required by law (The regulations are the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients, (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 (HIPPA), 45 CFR, Parts 160 & 164) and certain North Carolina laws.



This Release is active for one year effective on the date of signature.

Instructions: *Initial next to the statement that you understand and agree to:*

I agree to have all of my information listed above to be visible to all helping agencies within the groups referenced above.

SECTION 1 – HMIS Standard Information

☐ Yes, I agree to share my standard information in HMIS.

☐ No, I do not agree to share my standard information in HMIS.

SECTION 2 – HMIS Data Visibility

☐ Yes, I agree to share my HMIS information.

☐ No, I do not agree to share my HMIS information (Only our agency will see all your detailed information).

SECTION 3 – Coordinating Group

☐ Yes, I agree to share my information for coordination of care.

☐ No, I do not agree to share my information for coordination of care.

HMIS@NCCEH Release of Information

Client Consent (for 1 year)

Clients must initial next to each Section:

This Release is active for one year effective on the date of signature.

Instructions: *Initial next to the statement that you understand and agree to:*

I agree to have all of my information listed above to be visible to all helping agencies within the groups referenced above.

SECTION 1 – HMIS Standard Information

☐ Yes, I agree to share my standard information in HMIS.

☐ No, I do not agree to share my standard information in HMIS.

SECTION 2 – HMIS Data Visibility

☐ Yes, I agree to share my HMIS information.

☐ No, I do not agree to share my HMIS information (Only our agency will see all your detailed information).

SECTION 3 – Coordinating Group

☐ Yes, I agree to share my information for coordination of care.

☐ No, I do not agree to share my information for coordination of care.



NCCEH

HMIS@NCCEH Release of Information

Client Consent

To complete, client signs, dates, and lists any dependents this applies to

→

Client signature: _____, Date: ____/____/____,

Signature of guardian or authorized-representative (when required): _____

Relationship to client: _____ Date signed by guardian/authorized representative: ____/____/____

This release of information also applies to the following dependents:

Last Name	First Name	Date of Birth

HMIS@NCCEH Policies and Procedures

More detail is included in HMIS@NCCEH Policies and Procedures

- Found at ncceh.org/hmis/admin



NCCEH

HMIS@NCCEH Policies and Procedures

What to do if

A client is a victim of abuse, neglect or domestic violence, or if a client reports that he/she is a victim of abuse, neglect or domestic violence, a more detailed discussion about HMIS with the client is recommended.

HMIS@NCCEH Policies and Procedures

If HMIS poses a safety risk

A client is a victim of abuse, neglect or domestic violence, or if a client reports that he/she is a victim of abuse, neglect or domestic violence, a more detailed discussion about HMIS with the client is recommended.

Options to secure the record:

- ☐ Lock visibility to the Standard Information
- ☐ The right to refuse sharing if the agency has HMIS data visibility with other agencies
- ☐ The right to be entered as an unnamed record, masking identifying information as a randomly generated number.
- ☐ The right to have client profile inactivated in HMIS. Security of hard copy files: Agencies may create a paper record by printing the assessment screens located within HMIS.

HMIS@NCCEH Policies and Procedures

What if?	Do this!
A client exercises their right to secure their record (for DV or other clients)	Contact the Data Center If the client will not share with any outside agencies, add an eROI set to "No" and attach a scanned copy of the ROI document (if possible)
Someone asks for information that you can't share	Reply, I know you mean the best, but I cannot share that information
You find or believe there could be a risk to client privacy and security	Contact the Data Center

HMIS@NCCEH Policies and Procedures

Term	Brief Definition
Agency Participation Agreement (APA)	The agreement between NCCEH and HMIS participating agencies that specifies the responsibilities of participating agencies and allows agencies to have HMIS licenses.
HMIS User Agreement & Code of Ethics	The document each HMIS user signs that defines the HMIS standards of conduct.
Privacy Script	The conversation guide provided to help staff explain privacy rights to clients in order to standardize the privacy presentation.

The background of the image is a solid teal color, overlaid with a repeating pattern of white line-art icons. These icons represent various types of buildings, including houses, multi-story apartment blocks, and industrial structures, as well as some trees. The pattern is dense and covers the entire background.

Access to Data

HMIS Access and User Authorization

License Basics

Unique username and password

- Don't share
- Personal accountability

Automatic security functions

- ServicePoint requires a password change every 45 days
- ServicePoint will log out after a period of time passes without active use
- ServicePoint will lock your account after 3 failed login attempts
- SSL Encryption



HMIS Access and User Authorization

License Basics

Good Password management

- Required to include:
 - ☐ At least one number
 - ☐ At least one symbol
 - ☐ At least one lower-case letter
 - ☐ At least one upper-case letter
 - ☐ A minimum of 8 characters total
- Recommended to **not** include:
 - ☐ Common or personally meaningful words, phrases, or dates
 - ☐ Sequences (1234, abcd)
 - ☐ Repeated passwords



Physical Access

The **physical security of your computer** is just as important as its technical security.

- Locked office or cubicle within a locked area.
- Computer monitors away from view of others and/or a privacy screen used, if necessary.
- Computers are locked, requiring a password after it has gone into 'screensaver mode'.
- If you need to leave your computer- lock it so no one can use it.
When finished using your computer, turn it off!

Physical Access

Protect against unintended physical access

Emails can be forwarded or printed against privacy practices

- Never email sensitive information such as Social Security Numbers
- You may want to include a Confidentiality Notice on all emails

Example from local Permanent Supportive Housing partner:

"CONFIDENTIALITY NOTICE: This message and any attachments included are from Community Link and are for sole use by the intended recipient(s). The information contained herein may include confidential or privileged information. Unauthorized review, forwarding, printing, copying, distributing, or using such information is strictly prohibited and may be unlawful. If you received this communication in error please notify us immediately by e-mail and delete the original message."



Physical Access

Best Practice: Private space for assessments

The assessment space and experience should be designed to allow people to safely reveal sensitive information or safety issues.

- allow for both visual and auditory privacy
- allow assessors to gather information from each adult in the household in separate interviews, if appropriate.

Sensitive information might include the disclosure of mental illness, physical disabilities, gender identity, or abuse.



Physical Access

Examples of Access Violations

- Staff having clients sign “blank releases” in order to fill in at a later date when they are needed.
- The use of “general releases” (prohibited by State and Federal Law).
- Staff discussion within professional settings – “informal case discussions” – that occur onsite where others, without a “need-to-know”, may overhear.
- Staff discussion outside of professional settings – case discussions in public places.
- Staff identifying individuals as consumers at social events, self-help groups, or in public.
- Client files left in an open area for others to see.



The background of the entire image is a repeating pattern of stylized, white line-art icons on a teal background. These icons represent various types of buildings, including houses, multi-story apartment buildings, and industrial structures, as well as some trees. The pattern is dense and covers the entire area.

Additional Resources

Additional Resources

NCCEH Privacy Page

<https://www.ncceh.org/hmis/privacy/>

Keep NC Safe Guide

<https://www.ncceh.org/files/8468>

HMIS Requirements Proposed Rule

<https://www.federalregister.gov/documents/2011/12/09/2011-31634/homeless-management-information-systems-requirements#h-26>

OnGuardOnline.Gov

<https://www.consumer.ftc.gov/topics/online-security>

What's Next

Calendar events & deadlines

Date	Event
June 12 th	HMIS@NCCEH Launch!!!
June 17 th	Orange HMIS Users Meeting
June 30 th	Training & Agreements Deadline
July 15th	Orange HMIS Users Meeting
August 19 th	Orange HMIS Users Meeting



NCCEH

Contact NCCEH

hello@ncceh.org

919.755.4393

NCEndHomelessness 

@NCHomelessness 

nc_end_homelessness 

Contact NCCEH Data Center Help Desk

hmis@ncceh.org

919.410.6997



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