Peter and Paul Community Services
Homeless Management Information System (HMIS)
Privacy and Security Notice

A written copy of this Policy is available to all who request it.
It is also available on this agency's web site.

I. PURPOSE:

This notice describes the privacy policy of this agency. The policy may be amended at any time. We may use or disclose your information to provide you with services, and to comply with legal and other obligations. We assume that, by requesting services from our agency, you agree to allow us to collect information and to use or disclose it as described in this notice and as otherwise required by law.

The Homeless Management Information System (HMIS) was developed to meet a data collection requirement made by the United States Congress and the Department of Housing and Urban Development (HUD). Congress passed this requirement in order to get a more accurate count of individuals who are homeless and to identify the need for and use of different services by those individuals and families. We are collecting statistical information on those who use our services and report this information to a central data collection system.

In addition, many agencies in this area use HMIS to keep computerized case records. This information may be provided to other HMIS participating agencies. The information you may agree to allow us to collect and share includes basic identifying demographic data, such as name, address, phone number and birth date; the nature of your situation and the services and referrals you receive from this agency. This information is known as your **Protected Personal Information or PPI.** All agencies using the HMIS share their data with other participating agencies, with the exception of *Blind Service Providers*. These *blind* agencies serve specific protected client populations, such as domestic abuse, sexual abuse, HIV/AIDS, alcohol and/or substance abuse, and mental health, and do not share client information.

GENERALLY, all personal information we maintain is covered by this policy. Generally, your personal information will only be used by this agency and other agencies to which you are referred for services.

Information shared with other HMIS agencies helps us to better serve our clients, to coordinate client services, and to better understand the number of individuals who need services from more than one agency. This may help us to meet your needs and the needs of others in our community by allowing us to develop new and more efficient programs. Sharing information can also help us to make referrals more easily and may reduce the amount of paperwork.

Maintaining the privacy and safety of those using our services is very important to us. Information gathered about you is personal and private. We collect information only when appropriate to provide services, manage our organization, or as required by law.

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II. CONFIDENTIALITY RIGHTS:

This agency has a confidential policy that has been approved by its Board of Directors. This policy follows all HUD confidentiality regulations that are applicable to this agency, including those covering programs that receive HUD funding for homeless services. Separate rules apply for HIPAA privacy and security regulations regarding medical records.

This agency will use and disclose personal information from HMIS only in the following circumstances:

1. To provide or coordinate services to an individual.
2. For functions related to payment or reimbursement for services.
3. To carry out administrative functions including, but not limited to legal, audit, personnel, planning, oversight or management functions.
4. Databases used for research, where all identifying information has been removed.
5. Contractual research where privacy conditions are met.
6. Where a disclosure is required by law and disclosure complies with and is limited to the requirements of the law. Instances where this might occur are during a medical emergency, to report a crime against staff of the agency or a crime on agency premises, or to avert a serious threat to health or safety, including a person's attempt to harm himself or herself.
7. To comply with government reporting obligations.
8. In connection with a court order, warrant, subpoena or other court proceeding where disclosure is required.

III. YOUR INFORMATION RIGHTS:

As a client receiving services at this agency, you have the following rights:

1. **Access to your record**. You have the right to review your HMIS record. At your request, we will assist in viewing the record within five working days.
2. **Correction of your record**. You have the right to request to have your record corrected so that information is up-to-date and accurate to ensure fairness in its use.
3. **Refusal**. Our ability to assist you depends on having certain personal identifying information. If you choose not to share the information we request, we reserve the right to decline to provide you with services as doing so could jeopardize our status as a service provider.
4. **Agency's Right to Refuse Inspection of an Individual Record**. Our agency may deny you the right to inspect or copy your personal information for the following reasons:
    a. information is compiled in reasonable anticipation of litigation or comparable proceedings;
    b. information about another individual other than the agency staff would be disclosed;

c. information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the source of the information; or
d. information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.

5. **Harassment.** The agency reserves the right to reject repeated or harassing requests for access or correction. However, if the agency denies your request for access or correction, you will be provided written documentation regarding your request and the reason for denial. A copy of that documentation will also be included in your client record.
6. **Grievance.** You have the right to be heard if you feel that your confidentiality rights have been violated, if you have been denied access to your personal records, or if you have been put at personal risk, or harmed. Our agency has established a formal grievance process for you to use in such a circumstance. **To file a complaint or grievance you should contact our Chief Operations Officer, Amanda Laumeyer at: 314.338.8168**
7.

IV. HOW YOUR INFORMATION WILL BE KEPT SECURE:

Protecting the safety and privacy of individuals receiving services and the confidentiality of their records is of paramount importance to us. Through training, policies, procedures, and software, we have taken the following steps to make sure your information is kept safe and secure:

1. The computer program we use has the highest degree of security protection available.
2. Only trained and authorized individuals will enter or view your personal information.
3. Your name and other identifying information will not be contained in HMIS reports that are issued to local, state, or national agencies.
4. Employees receive training in privacy protection and agree to follow strict confidentiality standards before using the system.
5. The server/database/software only allows individuals access to the information. Only those who should see certain information will be allowed to see that information.
6. The server/database will communicate using 128-bit encryption-an Internet technology intended to keep information private while it is transported back and forth across the Internet. Furthermore, identifying data stored on the server is also encrypted or coded so that it cannot be recognized.
7. The server/database exists behind a firewall-a device meant to keep hackers/crackers/viruses/etc. away from the server.
8. The main database will be kept physically secure, meaning only authorized personnel will have access to the server/database.
9. System Administrators employed by the HMIS and the agency support the operation of the database. Administration of the database is governed by agreements that limit the use of personal information to providing administrative support and generating reports using aggregated information. These agreements further ensure the confidentiality of your personal information.

V. BENEFITS OF HMIS AND AGENCY INFORMATION SHARING:

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Information you provide us can play an important role in our ability and the ability of other agencies to continue to provide the services that you and others in the community are requesting.

Allowing us to share your name results in a more accurate count of individuals and the services they use. Obtaining an accurate count is important because it can help us and other agencies:

1. Better demonstrate the need for services and the specific types of assistance needed in our area.
2. Obtain more money and other resources to provide services.
3. Plan and deliver quality services to you and your family.
4. Assist the agency to improve its work with families and individuals who are homeless.
5. Keep required statistics for state and federal funders, such as HUD.

VI. COMPLIANCE WITH OTHER LAWS

This agency complies with all other federal, state and local laws regarding privacy rights. Consult with an attorney if you have questions regarding these rights.

VII. PRIVACY NOTICE AMENDMENTS:

The policies covered under this Privacy Notice may be amended over time and those amendments may affect information obtained by the agency before the date of the change. All amendments to the Privacy Notice must be consistent with the requirements of the Federal Standards that protect the privacy of consumers and guide HMIS implementation and operation.

VIII. Web Site

We maintain a copy of the Privacy Notice on our web site at: ppcsinc.org/publications/