

Privacy Training: when a client declines consent

September 2022



NC COALITION to
HOMELESSNESS end



Consent to Share

Reminders about HMIS consent

Automatic Record Keeping

- When a client presents for services, implied consent exists for HMIS record keeping within an agency

Sharing Choices Available

- Outside that original agency, affirmative and informed consent is required
 - Consent to share data is not required for services
 - Once consent is given, the client has the right to withdraw future sharing



HMIS@NCCEH Release of Information

Consent documentation for data sharing

HMIS CLIENT RELEASE OF INFORMATION

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

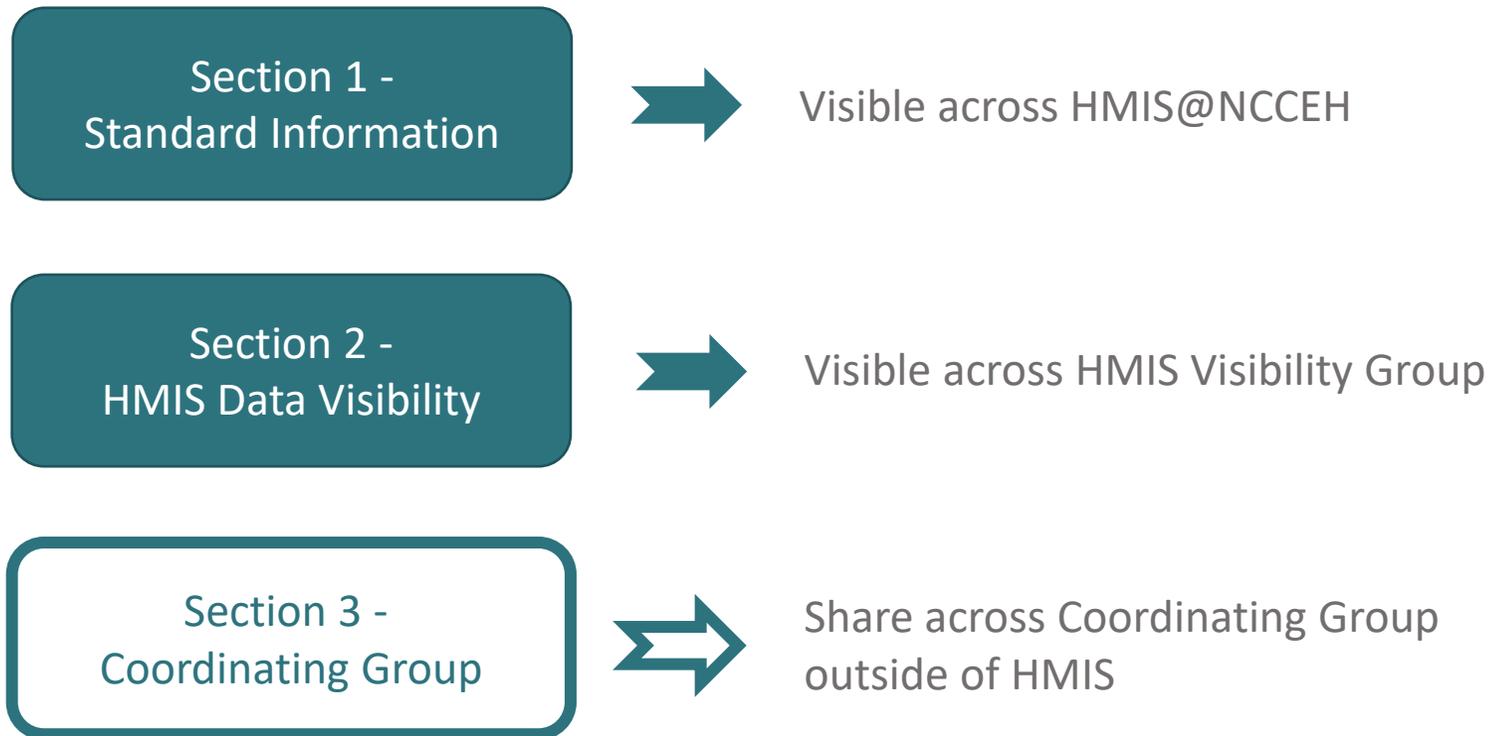
Introduction: Protecting your information is important to us. This document outlines how we use and protect your information. Many North Carolina shelters and helping programs use the Homeless Management Information System managed by North Carolina Coalition to End Homelessness (HMIS) to keep information 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.



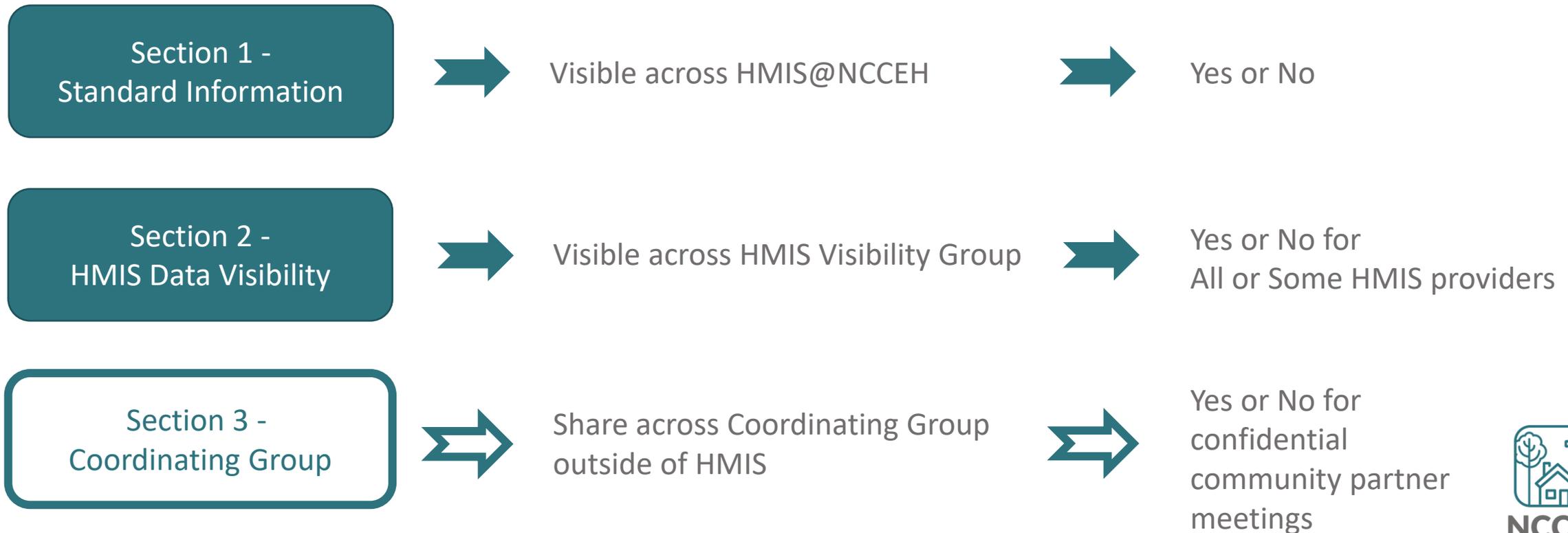
HMIS@NCCEH Release of Information

Three sections extend Consent over more data to more partners



HMIS@NCCEH Release of Information

Three sections extend Consent over more data to more partners



What happens when clients say no

1. Create a new Client ID
2. Mark the eROI Permission as “No”
3. Attach the paper ROI to document the specific sections declined

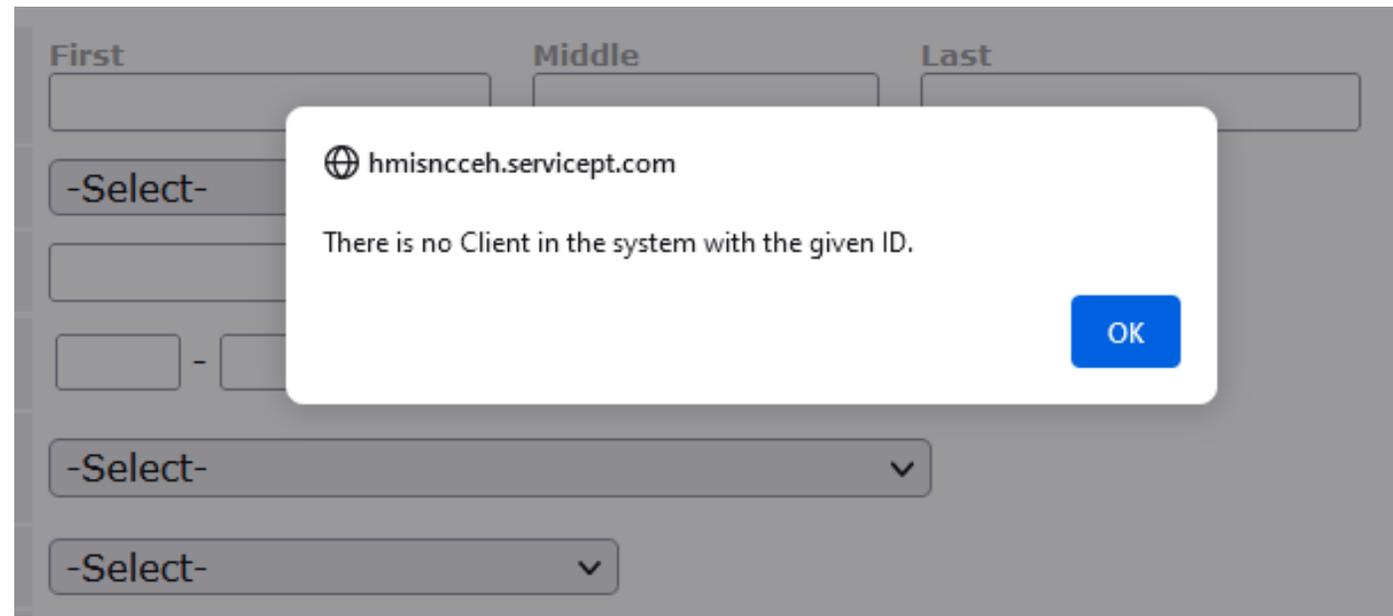
Client Information		Service Transactions							
Summary	Client Profile	Households	ROI	Entry / Exit	Case Managers	Case Plans	Measurements	Activities	Assessments
Release of Information									
	Provider		Permission		Start Date		End Date		
	 Heading Home - Rowan County - Emergency Shelter		No		09/26/2022		09/26/2023		

What happens when clients say no

No to *ROI Section 1: Standard Information*

- Agencies outside of the original cannot view or search for the client
- Mark the eROI permission as No
- Attach the paper ROI to document

To everyone else, this ID will not exist



The screenshot shows a web form with fields for 'First', 'Middle', and 'Last' names. Below these are several dropdown menus, some with '-Select-' as a placeholder. A modal dialog box is overlaid on the form, displaying the URL 'hmisncceh.servicept.com' and the message 'There is no Client in the system with the given ID.' with an 'OK' button.

What happens when clients say no

No to ROI Section 2: HMIS Visibility

- Agencies participate in Visibility / Sharing Groups
 - Clients can decline all or some of the partners

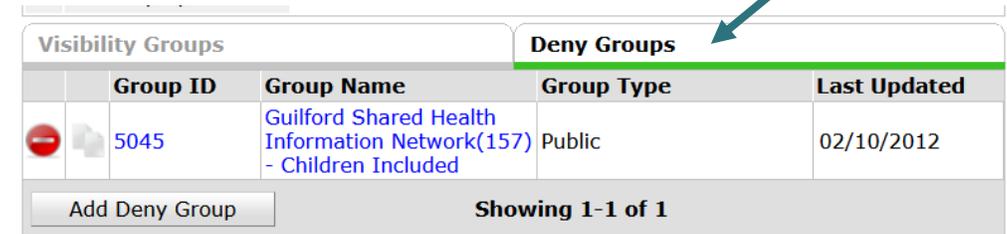
Groups of projects are added after agencies sign sharing agreements



Visibility Groups			Deny Groups	
	Group ID	Group Name	Group Type	Last Updated
	16563	Durham CE Community Wide Sharing Group 02282020	Local	07/20/2020
	16195	Durham CE Front Door ES Sharing Group 20190912	Local	07/20/2020
	14645	Durham County Coordinated Intake 20170420	Local	07/20/2020
	14728	Durham County Coordinated Intake 20170626	Local	07/20/2020
	11792	Urban Ministries of Durham Durham County Internal Sharing 20150708	Local	07/20/2020

Add Visibility Group Showing 1-5 of 5

Groups of projects are removed manually when a client blocks sharing



Visibility Groups			Deny Groups	
	Group ID	Group Name	Group Type	Last Updated
	5045	Guilford Shared Health Information Network(157) - Children Included	Public	02/10/2012

Add Deny Group Showing 1-1 of 1



What happens when clients say no

No to *ROI Section 2: HMIS Visibility*

- Agencies participate in Visibility / Sharing Groups
 - Clients can decline all or some of the partners
- Mark the eROI permission as No
- Attach the paper ROI to document



What happens when a client says no

No to *ROI Section 3: Coordinating Group*

- Agency cannot identify client during community partner meetings outside of HMIS reports
 - Explain to the client what services need referrals in your community (employment, food, childcare assistance?)
- Mark the eROI permission as No
- Attach the paper ROI to document

What happens when a client says no

No to *ROI Section 3: Coordinating Group*

- Agency cannot identify client during community partner meetings outside of HMIS reports
 - Explain to the client what services need referrals in your community (employment, food, childcare assistance?)
- Mark the eROI permission as No
- Attach the paper ROI to document

What happens when clients say no

1. Create a new Client ID
2. Mark the eROI Permission as “No”
3. Attach the paper ROI to document the specific sections declined

Client Information		Service Transactions							
Summary	Client Profile	Households	ROI	Entry / Exit	Case Managers	Case Plans	Measurements	Activities	Assessments
Release of Information									
	Provider		Permission		Start Date		End Date		
	 Heading Home - Rowan County - Emergency Shelter		No		09/26/2022		09/26/2023		

What happens when clients say no

1. Create a new Client ID
2. Mark the eROI Permission as “No”
3. Attach the paper ROI to document the specific sections declined
4. **Email the Data Center Helpdesk**



What if a client is still concerned?

If a client is worried about a profile in HMIS, there are other options:

1. Hide their Name in an “Unnamed record”
 - Collect client information on paper forms
 - Contact Data Center to switch your HMIS license to only create Unnamed records
 - Save the client ID number in a secure location
2. Clients may use a code-name, pseudonym, or partial name to obscure/de-identify their information
 - Mark Name Data Quality as “Partial”
 - This will be reported as an error in reports



When in doubt

1. Collect Paper Forms
2. Contact the Data Center (hmis@ncceh.org)





Questions?



Additional Resources

Additional Resources

HMIS@NCCEH Privacy Documents

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

More details and tips on Privacy

<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>



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



NCCEH