

June 2019



## Agenda

#### **System Updates:**

**Privacy Documentation** 

NCCEH Website Changes

**HMIS Data Collection Forms** 

Questions, Concerns, Feedback

#### What's Next Calendar:

July HMIS Users Meeting





### **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. <a href="https://www.ncceh.org/hmis/about/">https://www.ncceh.org/hmis/about/</a>
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.





## Principles

Confidentiality / Need to Know

Informed Consent / Choice

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



### **HIPAA**

HIPAA covered entities have additional requirements and procedures





### **Documents and Tools**

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



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 or 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.



"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."



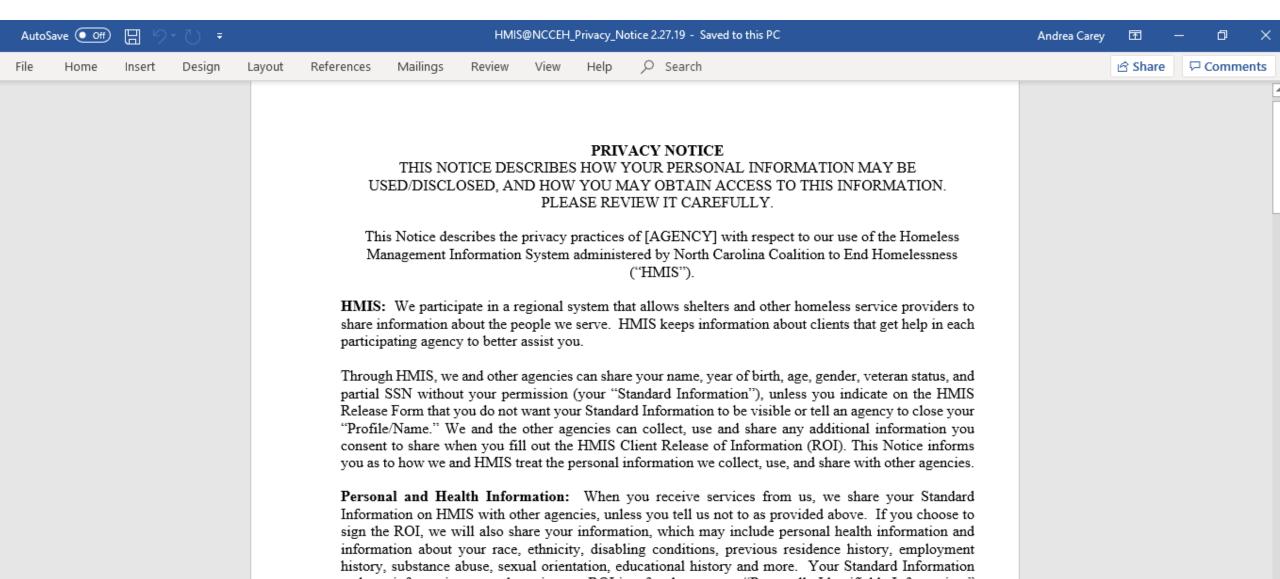
"...Some or your information may be shared with other organizations to coordinate referrals, housing, or services. Those other organizations also have privacy policies to protect your personal information. You have the right to tell us we should not make your information that is entered into the database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



**Questions, Concerns, Feedback?** 





#### **Actions for Agencies**

Insert your Agency Name

#### 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").



### **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				



- All staff within an agency using HMIS must have read and understood the Privacy Notice whether they enter information in the system or not!
- Staff must provide the Privacy Notice to the client upon request and explain it.



# **HMIS Privacy Notice**

**Questions, Concerns, Feedback?** 



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### **Actions for Agencies**

☐ Fill in your Agency Name before printing

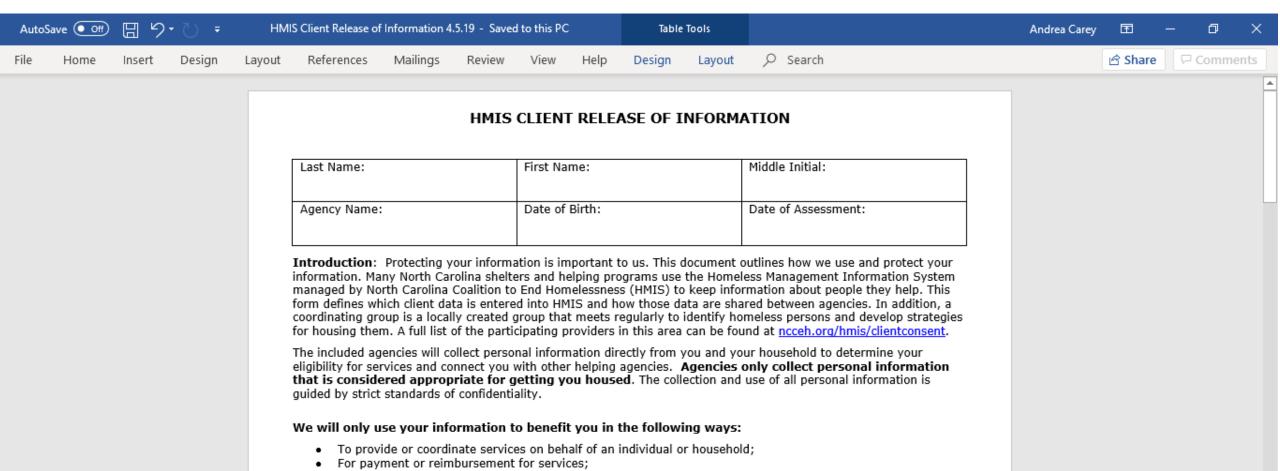
HMIS CLIE	NT RELEAS	E OF IN	FORMATION
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Last Name:	First Name:	Middle Initial:
Agency Name:	Date of Birth:	Date of Assessment:

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



#### Introduction



#### Introduction

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



#### **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.



### 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



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#### Client info *should not* be used for:

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



#### What's Allowed with Whom?

Sharing Data within your Agency

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



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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



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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

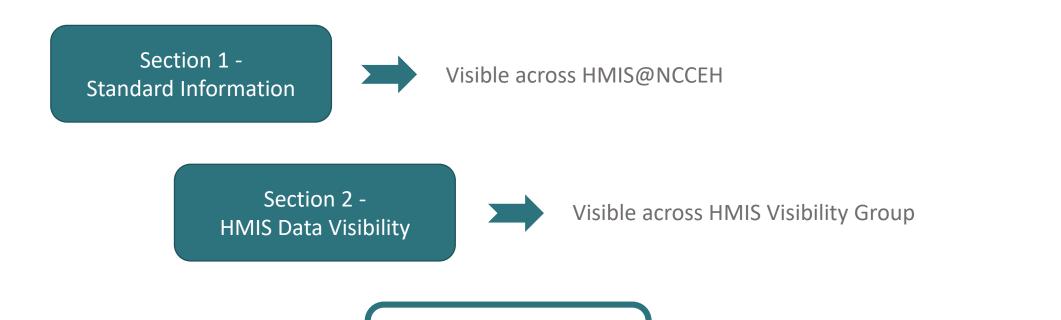
- Section 1 Standard Information
- Section 2 HMIS Data Visibility within Coordinating Group

Consent to share outside of HMIS and outside of your Agency

Section 3 - Coordinating Group



Three sections extend Consent over more data to more partners



Section 3 -

**Coordinating Group** 

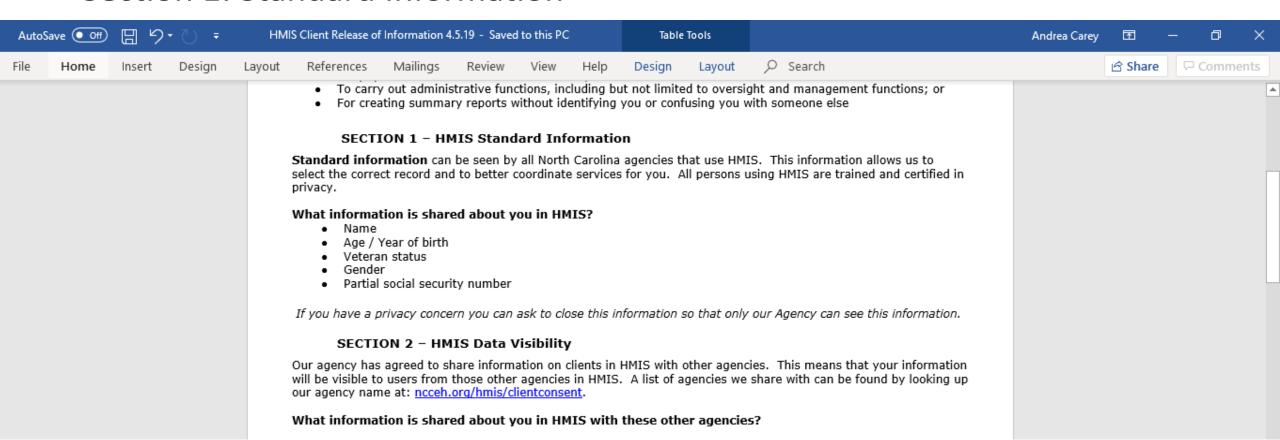


Share across Coordinating Group

outside of HMIS

### Consent to visibility in HMIS but outside of your Agency

Section 1: Standard Information



### Consent to visibility in HMIS but outside of your Agency

Section 1: Standard Information

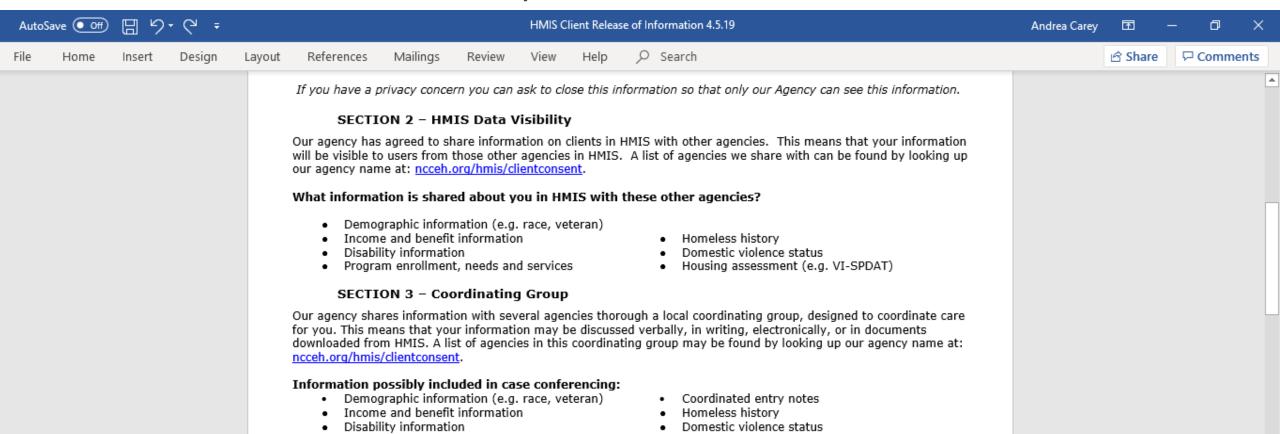
Client details visible for search and de-duplication purposes:

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



### Consent to visibility in HMIS but outside of your Agency

Section 2: HMIS Data Visibility



#### 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, Chronically Homeless)

Agencies included in HMIS Data Visibility groups can be found at <a href="ncceh.org/hmis/clientconsent">ncceh.org/hmis/clientconsent</a>.



### Consent to visibility in HMIS but outside of your Agency

### Section 2: HMIS Data Visibility

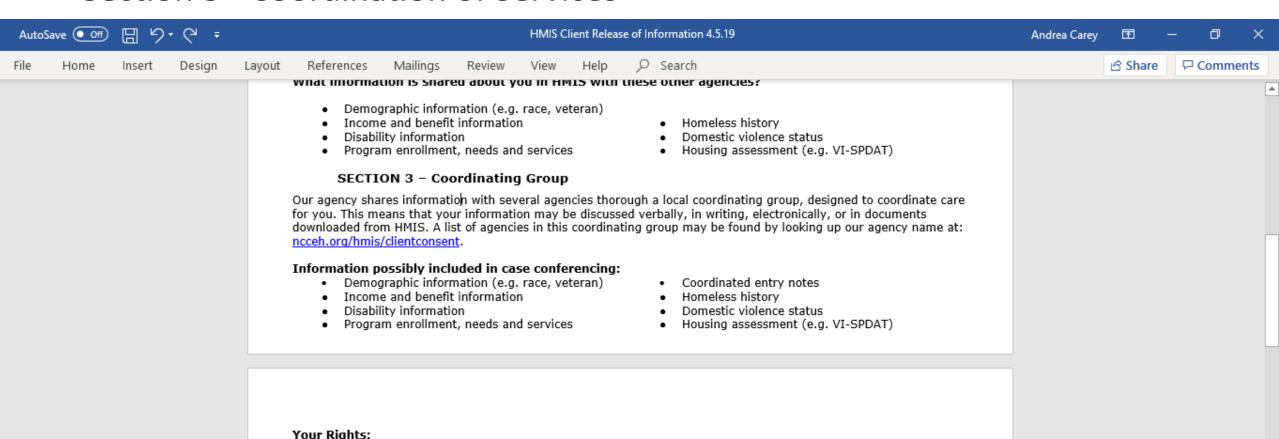
What information in HMIS is visible for these agencies?

- 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)



#### Consent to share outside of HMIS and outside of your Agency

Section 3 - Coordination of Services



#### Consent to share outside of HMIS and outside of your Agency

#### Section 3 – Coordinating Group

- 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.



#### 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



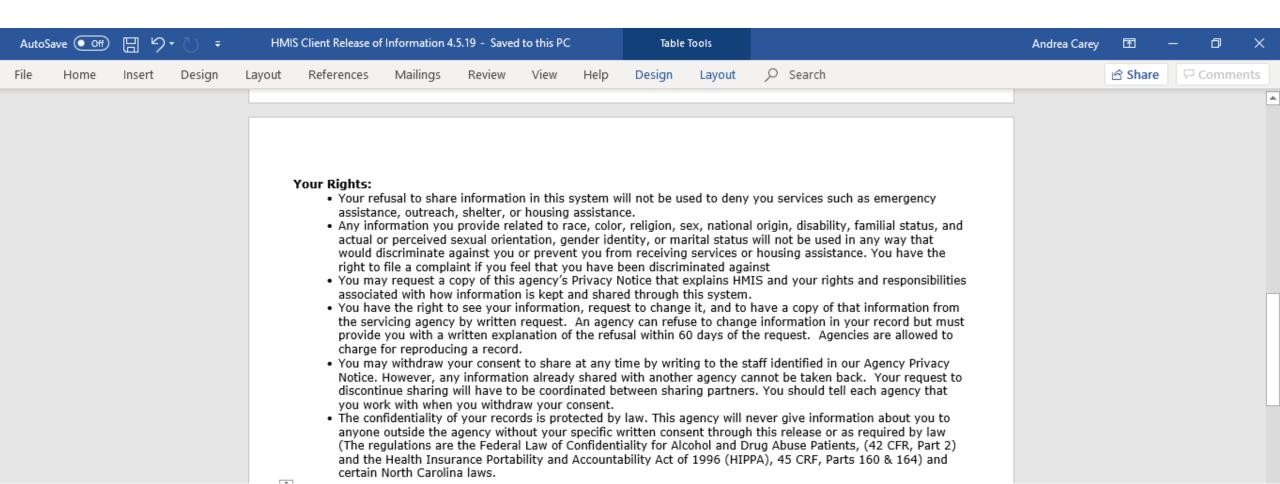
#### Consent to share outside of HMIS and outside of your Agency

Section 3 – Coordinating Group

- Agencies included in Coordinating Groups can be found at <u>ncceh.org/hmis/clientconsent</u>.
- Agencies can update the members of their Coordinating Group under the Privacy materials on <a href="https://nceh.org/hmis/admin">ncceh.org/hmis/admin</a>.



#### **Individual Client Rights**

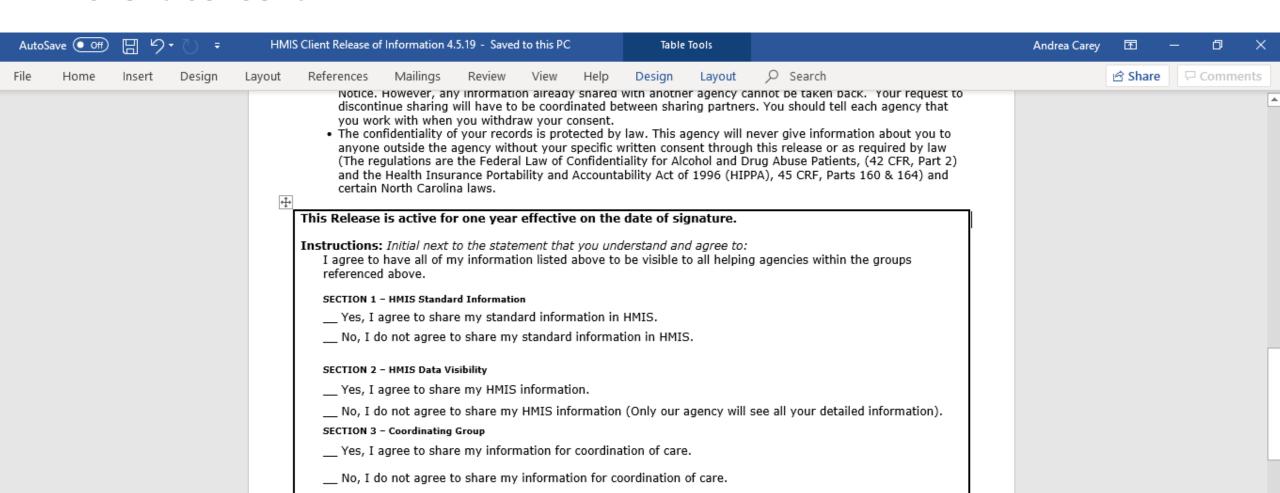


#### **Individual Client Rights**

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

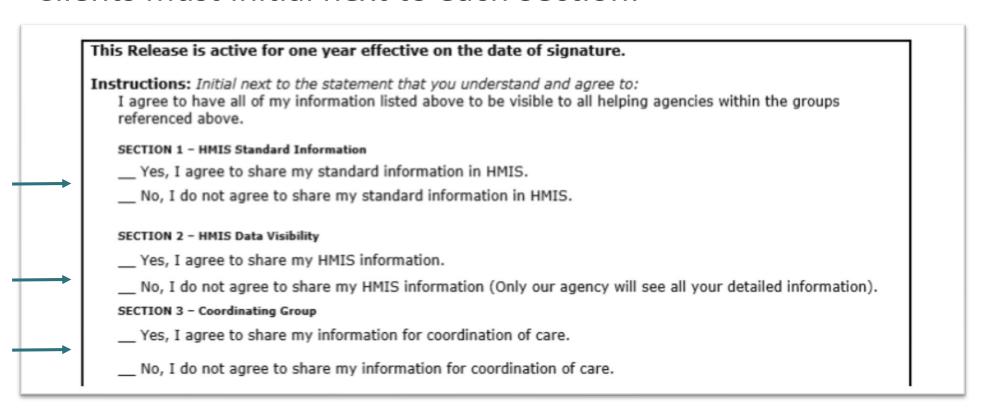


#### **Client Consent**



#### **Client Consent (for 1 year)**

Clients must initial next to each Section:





#### **Client Consent**

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

<b>→</b>	Client signature:	, Date:		
	Signature of guardian or authorized-representative (when required):			
	Relationship to client:	Date signed by guardian/author	rized representative:/	
	This release of information also ap			
	Last Name	First Name	Date of Birth	
$\longrightarrow$				
r				



# **HMIS Privacy Notice**

**Questions, Concerns, Feedback?** 



More detail is included in HMIS@NCCEH Policies and Procedures

Found at <u>ncceh.org/hmis/admin</u>



#### 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.



#### 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.

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



Term	<b>Brief Definition</b>
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.





#### 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



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!



#### 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."



#### **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.



#### **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.





### 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



# To-Do Checklist: Agency

June 6 Post HMIS Privacy Signs Post copies of the <u>HMIS Privacy Sign</u> in location where clients can clear 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

Ensure staff and volunteers can explain it to a client. Use this sample script to assist.

for your agency name before printing after downloading here!

NCCEH

### To-Do Checklist: HMIS User

Complete HMIS@NCCEH Privacy Training  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.	June 30
Complete HMIS@NCCEH Orientation Training  Watch the webinar and complete a quiz. This training will provide an overview of what to expect from HMIS@NCCEH and highlights key changes.	June 30
Roll Out Privacy + Assessment Changes  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.	June 6
Sign User Agreement + Ethical Standards  View a sample of the agreement <a href="here">here</a> . You may want to watch the <a href="Launch Orientation">Launch Orientation</a> and <a href="Privacy">Privacy</a> Training Webinars before signing the agreement as they provide additional explanation of the agreement terms. Watch your email to sign the agreement via DocuSign.	June 30



# NCCEH.org

Walk-through of resources and assessments



### Data Collection Forms / Assessments

#### Questions, Concerns, Feedback?

Document titles may have more than one project type listed

Matches the name and order in HMIS

Short training videos available on 3-4 data elements at a time





Calendar events & deadlines

Date	Event
June 12 <sup>th</sup>	HMIS@NCCEH Launch!!!
June 20 <sup>th</sup>	NC BoS CoC HMIS Users Meeting
June 30 <sup>th</sup>	Training & Agreements Deadline
<del>July 15<sup>th</sup></del>	NC BoS CoC HMIS Users Meeting
August 15 <sup>th</sup>	NC BoS CoC HMIS Users Meeting





hello@ncceh.org 919.755.4393

Contact NCCEH Data Center Help Desk

hmis@ncceh.org 919.410.6997





@NCHomelessness



nc\_end\_homelessness



