

Alameda County HMIS

# Privacy and Security Training Manual

v. 5.0

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# Why we are here...

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An HMIS is a computerized data collection application that facilitates the collection of information about homeless individuals and families using residential or other homeless assistance services and stores that data in an electronic format.

Over the past several years, Congress has directed HUD to assist local jurisdictions to implement HMIS and use data from these systems to understand the size and characteristics of the homeless population nationally and locally, analyze patterns of service usage, assess unmet needs, and evaluate effectiveness in reducing and ending homelessness.

On July 30, 2004 HUD published its Final Notice describing the data and technical standards for implementing HMIS. The Final Notice requires the collection of fourteen Universal Data Elements. The Universal Data Elements are intended to identify the number of people who are homeless and accessing services from homeless providers as well as basic demographic characteristics of people who are homeless.

The Final Notice also calls for the collection of eleven program-specific data elements, with an additional six suggested elements which may be added to future APRs.

A core section of the Final Notice is dedicated to HMIS Privacy and Security Standards. These standards specify “baseline requirements” that all organizations must follow in the collection of data to protect the privacy of individuals seeking services, and “additional security recommendations” to best implement an HMIS. In addition, the community has set standards for data collection and handling consistent with the values of this Continuum of Care and best practices in other Continua.

The purpose of this training program is to insure that all people involved in the collection and/or handling of HMIS data elements in the Alameda County HMIS system learn the minimum requirements and implement them when working with clients and data collected from clients.

# Definitions

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## Agency/Jurisdiction

“Agency/Jurisdiction” refers generally to any Agency or Jurisdiction participating in the HMIS system in accordance with a current HMIS Participating Agency Memorandum Of Understanding.

## Aggregate Data

Data collected across the system, or across the agency, which does NOT contain PPI.

## APRs

Annual Progress Reports

## CHO

~~Covered Homeless Organization. Any organization (including its employees, volunteers, affiliates, contractors, and associates) that records, uses or processes PPI on homeless clients for an HMIS.~~

## EveryOne Home

The countywide entity coordinating housing and services to end homeless in Alameda County.

## HIPAA Covered Entity

An agency/jurisdiction that is required to comply with all HIPAA (Health Insurance Portability and Accountability Act of 1996) standards as defined by federal regulations.

## HMIS

Homeless Management Information Systems. A computerized data collection application that facilitates the collection of information on homeless individuals and families using residential or other homeless assistance services and stores that data in an electronic format.

## MOU

Memorandum of Understanding. A signed agreement between agencies/jurisdictions and EveryOne Home specifying the terms of participating in the HMIS system.

## Update

Represents information that is collected at multiple points during project enrollment in order to track changes over time (e.g., Income and Sources) or is entered to record project activities as they occur (e.g., Services Provided).

## Annual Assessment

Specialized subset of the ‘update’ collection point. The annual assessment **must** be recorded no more than 30 days before or after the anniversary

## **PPI**

Protected Personal Information. Any information maintained by or for a Covered Homeless Organization about a living homeless client or homeless individual that: (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual. Data fields determined by HUD to be PPI include: *first name, middle name, last name, suffix of name, other first name (alias), other middle name, other last name, other name suffix, social security number, date of birth, zip code of last permanent address, program entry date, program exit date, the client PIN number in the software application, the city code of the service provider, the facility code of the service provider, the CoC code, and the program type code.*

## **HMIS Privacy Agreement**

An agreement signed by anyone collecting data for entry into HMIS or working with data generated by the HMIS system that contains PPI, pledging to uphold all confidentiality and privacy standards set forth in the document.

## **Privacy Notice**

A document maintained and published by each agency/jurisdiction that describes its policies and practices for the processing of Protected Personal Identifiers (PPI).

## **Project Entry**

A client may have multiple entries for the same data element, but each will be associated with a different project entry and there should only be one value for each project entry. Data elements must be collected at the point of “project entry” and reflect the client’s circumstances on the date of that project entry.

## **Processing**

~~Any operation or set of operations performed on PPI, whether or not by automated means, including but not limited to collection, maintenance, use, disclosure, transmission and destruction of the information.~~

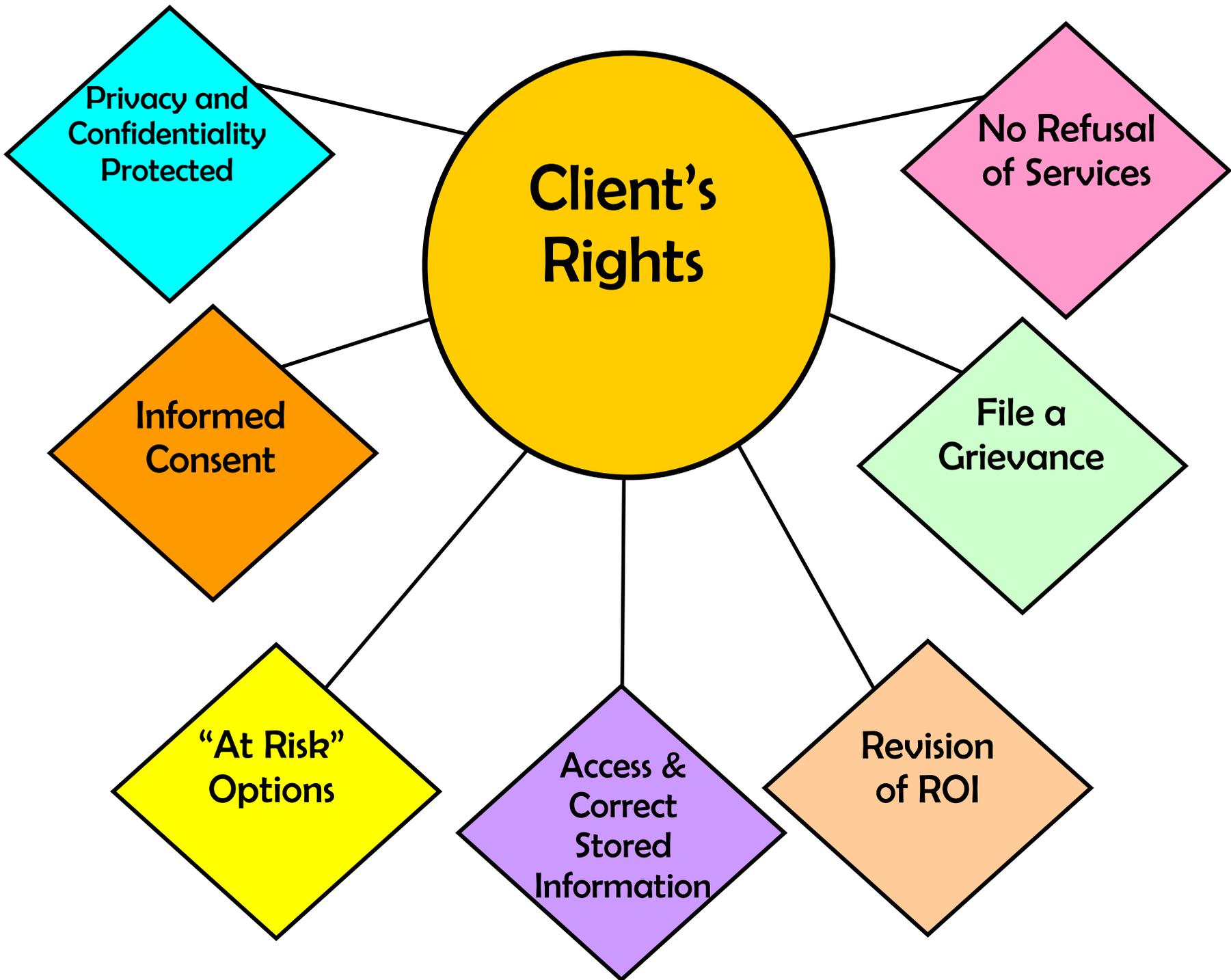
## **ROI**

Release of Information. An agreement signed by the client giving permission to share basic information data with other participating HMIS agencies/jurisdictions.

## **User Agreements**

An agreement signed by all licensed users of the HMIS system specifying the terms of being, and maintaining status as, a licensed user.







# Client's Rights...

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## ❖ Privacy and Confidentiality Protected...

- ◆ Your clients have the right to expect that private information they are asked to provide to your agency/jurisdiction, is protected at all times. This means that no one except authorized staff may see the data in hard copy or electronic version. HUD HMIS Standards and the Alameda County HMIS Policies and Procedures, which specify how client information is to be collected and handled, seek to protect the confidentiality of your client's personal information at all times.

## ❖ Informed Consent and the ROI...

- ◆ Your client has the right to be fully informed about the information that is being collected for the HMIS system and the benefits of sharing that information.
- ◆ Your client must give you written consent for their data to be shared.

## ❖ "At Risk" option...

- ◆ Your client may be offered an additional consent option if they believe they are at risk of violence to themselves or a family member by having PPI shared.

## ❖ Access and Correct Stored Information

- ◆ Your client has the right to inspect and have a copy of their data that has been entered in the HMIS system.
- ◆ Your client may request the correction of inaccurate or incomplete PPI. Such requests may be addressed with the addition of supplemental information into the HMIS system. Procedures for these requests are defined in the agency/jurisdiction's Privacy Notice.

# Client's Rights...(cont.)

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## ❖ Revise their ROI...

- ◆ Your client may change the authorization of their “Client Release of Information Authorization” at any time. Changes will not be retroactive.

## ❖ File a grievance

- ◆ Your client may file a complaint regarding your agency's privacy and security policies and practices. The procedure for this must be identified in the agency Privacy Notice.

## ❖ No refusal of services...

- ◆ Your client may not be refused services for choosing not to have their data “shared” in the HMIS system.

# Your Agency's Role...

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The HUD privacy standards apply to any homeless assistance organization (CHO) that records, uses or processes protected personal information (PPI) for an HMIS.

A detailed summary of the HUD HMIS Privacy and Security Standards are included with these training materials.

**❖ Your agency is required to comply with these HUD HMIS standards.**

In addition to the HUD HMIS Privacy and Security Standards, your agency's participation in the HMIS system will also be governed by the HMIS Policies and Procedures and interpretation of the HUD HMIS Privacy and Security Standards. These policies and procedures govern the operation of the HMIS system.

**❖ Your agency is required to comply with the HMIS Policies and Procedures manual.**

The following pages incorporate both HUD HMIS Privacy and Security Standards and the HMIS Policies and Procedures.

# Your Agency's Role...(cont.)

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## ❖ Privacy Notice

- ◆ Document: Your agency must publish a privacy notice describing its policies and practices for the processing of PPI and must provide a copy of its privacy notice to any individual upon request.
- ◆ Website: If your agency maintains a public web page, the agency must post a current version of its privacy notice on the web page.
- ◆ Sign: Your agency must post a sign stating that its privacy notice is available to any individual who requests a copy.

**Name of Agency**

A copy of our Privacy Notice which describes our policies and practices for processing your personal information is available upon request.

- ◆ An agency must provide reasonable accommodations for persons with disabilities throughout the data collection process. This may include but is not limited to providing qualified sign language interpreters, readers or materials in accessible formation such as Braille, audio, or large type, as needed by the individual with a disability.
- ◆ Agencies that are recipients of federal financial assistance shall provide required information in languages other than English that are common in the community, if speakers of these languages are found in significant numbers and come into frequent contact with the program.

## ❖ Intake Desk “Collection” Notice Sign

- ◆ An agency must post a sign at each intake desk (or comparable location) that generally explains the reasons for collecting this information. You may use the following language to meet this standard.

*"We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate."*

## ❖ Informed Written Consent

### ***Additional Privacy Protections***

- ◆ An agency will collect PPI only with the express knowledge or consent of the individual (unless required by law).
- ◆ An agency will obtain written consent from the individual for the collection of personal information from the individual or from a third party.

# Your Agency's Role...(cont.)

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## ❖ Enter Data Regularly

- ◆ Data entry by an agency/jurisdiction must take place, at minimum, on a weekly basis.

## ❖ Hard Copy Security

- ◆ Your agency must secure any paper or other hard copy containing personal protected information that is either generated by or for the HMIS system. This includes, but is not limited to reports, intake forms, data entry forms, and signed consent forms.
- ◆ Your agency must supervise, at all times, any paper or other hard copy generated by or for HMIS that contains PPI when the hard copy is in a public area.
- ◆ When agency staff is not present, the information must be secured in areas that are not publicly accessible.
- ◆ Your agency is responsible for disposing of documents that contain PPI by shredding paper records.

**NOTE:** Your agency is also responsible for securing, at all times, any PPI generated by the HMIS system that is copied to an electronic format.

## ❖ Storing ROIs

- ◆ Your agency must securely store all paper copies of ROIs.

## ❖ Disclosing PPI

An agency/jurisdiction may use or disclose PPI collected for the HMIS system under the following circumstances:

- (1) To provide or coordinate services for an individual;
- (2) for required 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 PPI.

Additional disclosures allowed:

- ◆ Uses and disclosures required by law.
- ◆ Uses and disclosures to avert a serious threat to health or safety.
- ◆ Uses and disclosures about victims of abuse, neglect or domestic violence.
- ◆ Uses and disclosures for academic research purposes in limited circumstances.
- ◆ Uses and disclosures for specific law enforcement purposes (e.g. subpoenas).

## ❖ Insure Workflow Supports Adherence to Privacy Standards

- ◆ Your agency is responsible for making sure that the flow of PPI within the agency, from Intake, to data entry, to reporting, supports the adherence to all privacy standards protecting client privacy and confidentiality.

# Your Role...

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As an employee/representative of your agency, you are responsible for complying with the privacy protections. You should familiarize yourself with all the Privacy and Security standards with which your Agency must comply. The following pages identify some specific standards that you will be expected to uphold as they relate to HMIS.

## ❖ Agree to Observe and Support Privacy Standards

- ◆ If you work with PPI collected for, or generated by, the HMIS system, you will be required to sign the “HMIS Privacy Agreement” and successfully complete HMIS Privacy and Security Training.
- ◆ You will be required to sign a confidentiality agreement with your agency/jurisdiction acknowledging receipt of the agency/jurisdiction’s Privacy Notice and pledging to comply with it.

## ❖ Inform Clients

- ◆ Using the “What is the HMIS System?/Client Release of Information Authorization” you will inform clients about how their data will be stored and shared. You will answer any questions clients have regarding the use of their data.
- ◆ If necessary, you will need to find accommodations for informing clients based on language needs or disabilities.

## ❖ Obtain Signed Consent/ROIs

- ◆ Prior to collecting client data for the HMIS system, you will complete the *Client Release of Information Authorization* form with the client, including co-signing the consent form as the agency representative.

## ❖ Addressing client's "at risk" concerns...

- ◆ If your client expresses concerns about believing s/he or a family member is at risk of violence from disclosing information, you need to follow the procedures for providing them with an option for limited display of information. You need to also complete an additional section of the ROI to request this option.

## ❖ Conduct Intake using recommended questions...

- ◆ Using the HMIS *Standard Intake Form (SIF)* or a customized agency or jurisdiction form, you will conduct the Intake asking the recommended questions.

## ❖ Ask ALL information on forms...

- ◆ Ask each client every applicable question on their intake form. The only exception is Detailed Military Service. These detailed questions do not need to be asked of a client who never served in the U.S. military.

## ❖ Secure all client data at all times...

- ◆ You are responsible, at all times, for securing any paper or other hard copy containing personal protected information that is either generated by or for the HMIS system. This includes, but is not limited to, reports, intake forms, data entry forms, and signed consent forms.
- ◆ If you are working with an electronic version of client data obtained from the HMIS system, you are responsible for the security of that data at all times.
- ◆ You are responsible for disposing of documents that contain PPI by shredding paper records.

# The Intake Process checklist...

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- “Collection” Notice is visible at Intake desk
- Agency Privacy Notice copies at Intake desk
- No other client data is visible
- Search for client;  
are intake answers displayed?
- Explain and discuss Client Consent
- Respond to “at risk” issues raised
- Client initials (and signs) ROI
- Sign ROI as Agency Representative
- Give client Page 1 of ROI
- Offer client a copy of Agency Privacy Notice
- Ask all Intake questions (tagged  
questions only if data displayed)
- Attach ROI to Intake form (clip  
all household Intakes/ROI together)
- Store all paperwork securely- submit for  
data entry

# Obtaining Client Consent...

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## HMIS Client Release of Information (ROI)

Clients need to know that their data will be kept in the HMIS system. Their signed authorization is required for the purpose of **sharing** their HMIS data with other agencies and jurisdictions participating in the HMIS system.

### **All intake information is entered into HMIS.**

#### **With signed ROI:**

Entered intake information is **shared** with participating HMIS agencies/jurisdictions.

#### **WithOUT signed ROI:**

Entered intake information is **“closed”** to other HMIS agencies/jurisdictions.

# Obtaining Client Consent...(cont.)

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## Steps to obtaining Client Consent...

It is your responsibility to complete the following steps.

1. Inform your client about the HMIS system by reviewing the *“What is the HMIS System/Client Release of Information Authorization”* form.
2. Verbally discuss with your client the benefits of sharing their data and be sure that your client understands all ROI sections.
3. Tear off the *“What is the HMIS System”* page of the ROI and hand it to your client.
4. PRINT neatly the names of your client and minor children seeking services on the line provided on Page 3 of the form.
5. Have your client **initial** the statement indicating they received and reviewed the *“What is the HMIS System”* information.
6. **If consent is given**, have your client sign and date the ROI.
7. You sign and date the ROI as the *“Agency Representative.”*  
*If your client has chosen NOT to give consent, draw a line through their blank signature line on the ROI form, then sign and date it.*
8. If requested by your client, complete the Displayed Name and SSN Restriction, filling in the initials and the full names of adult client and, if applicable, their minor children.
9. Attach the ROI to the client intake form.
10. Clip together all ROI and Intakes for all household members.

# “At Risk” client concerns...

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If your client expresses concerns about believing s/he or a family member is at risk of violence from disclosing information, you need to discuss their concerns with a Case Manager before signing a consent form. If warranted by the Case Manager, follow the procedure for providing them with a Displayed Name and SSN Restriction.

The Case Manager should clarify the specific situation the client is in PRIOR to suggesting these options. If appropriate, suggest using only client initials, not necessarily even the client’s real initials, and no Social Security Number for the system-wide portion of HMIS. Then determine if the client prefers to share intake data or not.

## **Displayed Name and SSN Restriction:**

*(to be able to search for client record)*

1. Last Name: one initial only
2. First Name: one initial only
3. Social Security Number (SSN): Leave blank.

Full name and SSN will only be entered on the “Non-shared” assessment viewable only by the agency that entered the data.

# The HMIS

## Standard Intake Forms...

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Each question on the *HMIS Standard Intake Form* (SIF) is either mandated by HUD or required by your agency to report to funders to keep each of your agency's programs running.

- ❖ **Every household member receiving any type of service** (*e.g., a meal, a bed, any type of counseling, medical services, housing, or any other service*) **must have a completed intake and be entered into the HMIS system.**
- ❖ **If a client is set up in HMIS and has intake answers displayed, ask only the tagged questions upon Intake to a new agency/program.**
- ❖ **Ask each client every applicable question on their Intake form.**

**Exception:** If a client never served in the U.S. military, you do not need to ask the detailed **Military Service** questions.

The recommended questions are printed on the *HMIS Standard Intake Form*. While your agency/jurisdiction may use a customized form with additional intake data, it will include all the questions that appear on the *HMIS Standard Intake Form*.

- ❖ **First ask the question as printed on the Intake form. If the client is unsure of what is being asked, restate the question, as needed, to insure understanding.**

The completed Intake form (with the ROI attached) are clipped together by household and stored securely for data entry per your agency procedure.

# The HMIS

## Standard Intake Forms ...(cont.)

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### **Source of Collected Data:**

Most data is collected by client self-report during the interview process at Intake. Some questions as specifically marked on the Intake Form may be responded to using data from sources other than the client report.

The Intake answers may be:

1. Provided by the client (during Assessment and at Program Exit)
2. Taken from Case Manager interviews or records
3. Observed by Program Staff.

Please note the directions on the Intake Form to identify when questions may be answered with sources other than by client report.

### **Permanent Housing Program's Intake – Last Page:**

All permanent housing programs will have an additional intake page to records information about permanent housing upon the client's entry in to the program.

### **Recording Start Dates:**

Start dates should be recorded with the most accurate date.

1. The actual month, day, and year of the event.
2. The actual year, using 01/01 as the month and day.
3. One day prior to the intake date.

# The HMIS Program Exit Form...

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In addition to the intake form, the *HMIS Program Exit Form* must be completed for **every household member** upon exit from a program, regardless of reasons for exit.

❖ **Record an answer for every question on the Program Exit form.**

HUD has recommended the language of the questions when asking for these specific data elements. These questions must be used when completing this form.

❖ **First ask the question as printed on the HMIS Program Exit form. If the client is unsure of what is being asked, restate the question, as needed, to insure understanding.**

Upon completion, the *HMIS Program Exit Form* is given to your data entry person according to your agency/jurisdiction's established procedure.

## **Completing the Form:**

The information on the Program Exit form may be:

1. Provided by the client (in the course of client assessment and, for some data elements, at program exit) and/or
2. Taken from case manager interviews or records; and/or
3. Observed by program staff.

# The HMIS Permanent Housing Status Form...

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In addition to recording information at intake and exit, the *HMIS Permanent Housing Status Form* must be completed for **each household every time** the household moves into permanent housing or out of permanent housing.

❖ **Every permanent housing change must be recorded on the appropriate form.**

One side of the form reflects moves into permanent housing; the other side records move out of permanent housing. Sometimes, both sides will be completed if a client moves out of permanent housing and into another permanent housing situation.

# Documents...

- 1)HMIS Client Consent/ROI
- 2)Housing Status Definitions – Job Aid
- 3)Chronically Homeless – Job Aid
- 4)HMIS Standard Intake Form – ADULT
- 5)HMIS Standard Intake Form – CHILD
- 6)HMIS Program Exit Form
- 7)HMIS Adult Annual Update Form
- 8)HMIS Child Annual Update Form
- 9)HMIS Housing Status Form
- 10)HMIS Privacy Agreement

Support email: [hmissupport@acgov.org](mailto:hmissupport@acgov.org)

HMIS: <https://www.acgov.org/cda/hcd/hmis/index.htm>