

# Mahoning County HMIS PRIVACY NOTICE

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This *Privacy Notice* describes how information about you may be used and disclosed in the Mahoning County Homeless Management Information System (HMIS) and how you can get access to this information. Please review it carefully. The privacy of your personal information is important to us.

## **Purpose of This Notice**

This *HMIS Privacy Notice* tells you about how we use and disclose your protected personal information. It tells you about your rights and our responsibilities to protect the privacy of your protected personal information. It also tells you how to complain to us if you believe that we have violated any of your rights or any of our responsibilities.

We are required by law to maintain the privacy of your protected personal information. We must provide you with a copy of this *HMIS Privacy Notice* upon request. We must follow the terms of this Notice that are currently in effect.

We reserve the right to change our privacy practices and terms of this *HMIS Privacy Notice* at any time, provided such changes are permitted by applicable law. If this Notice is changed, a copy of the revised notice will be available upon request. The new terms shall be effective for all protected personal information that we maintain, including information we created or received before we made the changes.

## ***What is the Mahoning County Homeless Management Information System?***

In order to best serve your needs, we enter information about you and members of your family that are with you into a computer system called the Mahoning County HMIS. The HMIS is used by many homeless providers in Mahoning County that provide shelter, housing, and related support services. Although the HMIS helps us to keep track of your information, individually identifiable information about you is considered "Protected Information". Please, understand that access to shelter and housing services is available without your participation in data collection. However, your participation, although optional, is a critical component of our community's ability to provide the most effective services and housing possible.

## ***Why is information about you collected in the Mahoning County HMIS?***

- (1) To provide individualized case management and help make sure you get services you need.
- (2) To help us better understand the people we serve and their needs.
- (3) To help us understand the types of services people need and develop new services to meet the unmet needs.
- (4) To monitor whether your needs, and the needs of others in our community, were met.
- (5) To improve the quality of care and service for homeless individuals and families.

### **How We Use or Disclose Your Private Personal Information.**

Unless restricted by other laws, your information can be used by or disclosed to the following without your specific written consent:

- (1) To provide or coordinate services. We will use protected personal information about you to provide you with services. Upon a signed Release of Information from you, we will share this information with members of our staff and with others involved in your support. This includes other homeless services providers participating in the HMIS system. We will also use your protected personal information for functions related to payment or reimbursement for services.
- (2) To carry out administrative functions of our office. We will use and disclose your private personal information for operational purposes. For example, we may use your private personal information to evaluate our services, including the performance of our staff in caring for you. We may also use this information to learn how to continually improve the quality and effectiveness of the services that we provide to you. This also includes auditors or others who review the work of this Agency or need to review the information to provide services to this Agency.
- (3) Mahoning County HMIS System Administrator. The HMIS System Administrator runs the computer system to maintain the data. The SA will see your information in the process of fixing problems, running reports, or testing the system.

### **Other Uses or Disclosures of Your Personal Information**

Unless restricted by other laws, your information can be used by or disclosed to the following without your specific written consent:

- (1) Required by Law. We may disclose protected personal information about you when required by law to the extent that the use or disclosure complies with and is limited to the requirements of the law.
- (2) Public Health Activities. We may disclose private personal information about you if the HMIS user or developer, in good faith, believes that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public and is made to a person or persons reasonably able to prevent or lessen the threat, including the target of the threat.
- (3) Funeral Directors, Coroners, and Medical Examiners. We may disclose protected personal information about you as necessary to allow these individuals to carry out their responsibilities.
- (4) Victims of Abuse, Neglect or Domestic Violence. We may disclose protected personal information about you to a government agency if we believe you are the victim of abuse, neglect or domestic violence.
- (5) Academic Research Purposes. We may disclose protected personal information about you to staff from the sponsoring organizations or other authorized individuals who have permission to do research or report on the use and effectiveness of the services provided to you and others.
- (6) Legal Activities and Law Enforcement. We may disclose protected personal information about you to law enforcement officials for law enforcement purposes:
  - a. As required by law;
  - b. In response to a court order, subpoena or other legal proceeding;
  - c. To identify or locate a suspect, fugitive, material witness or missing person;
  - d. When information is requested about an actual or suspected victim of a crime;
  - e. To report a death as a result of possible criminal conduct;
  - f. To investigate allegations of misconduct that may have occurred on our premises;
  - g. To report a crime in emergency circumstances.
- (7) National Security and Intelligence. We may disclose protected personal information about you to authorized federal officials for national security and intelligence activities.

- (8) Protective Services for the President and Others. We may disclose protected personal information about you to authorized federal officials for the provision of protective services to the President of the United States or other foreign heads of state.

### **Uses or Disclosures That Require Your Authorization**

Other uses and disclosures will be made only with your written consent. You may cancel your consent at any time in writing. Once consent is given, your information may be released until such time as the cancellation is received and made known to those with authorized access.

### ***What rights are your rights regarding your information?***

The information contained in your HMIS record maintained by *(insert Agency name)* are the physical property of *(insert Agency name)*. The information in it belongs to you. You have the following rights:

- (1) You have the right to an explanation of any information contained in this *HMIS Privacy Notice* that you may not fully understand.
- (2) You have the right to obtain a copy of this *HMIS Privacy Notice* and any revisions we make to the Notice at any time.
- (3) You have the right to inspect and obtain a copy of the information that we maintain about you in the Mahoning County HMIS except for information compiled in reasonable anticipation of, or for use in, a civil, criminal, or administrative action or proceeding.
- (4) You have the right to request a correction of information that we maintain about you in the Mahoning County HMIS that you believe to be inaccurate or incomplete. You can exercise your rights as listed above by making a written request to *(insert Agency name)* at *(insert Agency address)*.
- (5) You have the right to question or complain about *(insert Agency name)* privacy and/or security policies and practices. If you believe that your privacy rights have been violated, you may send a written complaint to *(insert Agency name)* at *(insert Agency address)*. We are prohibited from retaliating against you for filing a complaint.

If you have further questions about this *HMIS Privacy Notice* or about your rights, contact *(insert Agency name)* at *(insert Agency telephone number)*. Please note, however, that *(insert Agency name)* cannot provide specific legal advice to you regarding your rights.

### **Grievance Procedures**

For Mahoning County HMIS-related grievances, a copy of the grievance and *(Agency's name)* response to that grievance will be forwarded to the HMIS System Administrator. Partner Agencies are obligated to report all HMIS-related grievances to the HMIS System Administrator, who documents and summarizes all grievances and resolutions. This information is made available to the HMIS Advisory Committee to determine the need for further action, if any. These actions might include further investigation of incidents, clarification or review of policies, or sanctioning of HMIS End Users and agencies if End Users or agencies are found to have violated standards set forth in HMIS Agency Agreements or the Policies and Procedures Manual.