

## **PRIVACY NOTICE**

*For North Dakota Homeless Management Information System (HMIS)  
Effective 01/20/05*

The North Dakota Continuum of Care is a group of agencies working together to prevent homelessness and provide services to homeless and formerly homeless individuals and families in North Dakota. When you request services (such as housing, case management, health or social services) you will be asked for personal information about you and your family. Our agency may be required to collect some personal information by law, or by organizations that give us funds to operate this program. The information is entered into a computer program called the North Dakota Homeless Management Information System (HMIS). This technology helps us to improve service delivery, better understand homelessness, and evaluate the effectiveness of our services. You have the right to refuse to provide personal information unless it is necessary to determine eligibility for a specific program or service. You will not be denied services if you decide not to share information that is not specifically required to determine eligibility.

This HMIS Privacy Notice has been prepared to inform you of our agency's policies to protect your information. Please let us know if you need special assistance to read or understand the content of this Notice.

### **How you and your family could benefit by providing the information:**

The HMIS is a statewide information system. By using HMIS, we may be able to reduce the amount of information we have to ask you if you have already provided it to another agency. This depends on whether or not you give written permission to share your information with other agencies. We can also use your information to help you find the services you need and whether or not you are eligible for them. We also plan to use HMIS to reduce the amount of time that we spend preparing reports, so we can spend more time with you.

### **The risks of providing the information:**

Your information will be entered into a statewide case management database. Only authorized individuals may have access to your information for the uses described in this notice. Unless you request otherwise, your personal identifiers will be disclosed to other HMIS agencies so they can easily locate your record if you go to them for services. Beyond your identifiers, this agency will only share your information with other agencies with your written consent.

### **How your data will be protected:**

*As a client, you have certain rights, which protect you and your information:*

- You have the right to ask for your identifying information to be hidden from view from other agencies. Otherwise, your identifiers will be viewable by other agencies so they can easily locate your record if you go to them for services.
- You have the right to view a copy of your electronic client file upon request. The Agency must provide the hardcopy for your review within 3 business days of your request. As well, you have the right to an explanation of any information

that you do not understand. You also have the right to add a comment to your electronic and/or hardcopy file clarifying, disputing, or amending information in your file.

*Your information is also protected by many security measures within HMIS:*

- With the exception of the basic identifying information mentioned above, we will not share your information with other agencies unless you give us specific written permission to do so. You can remove permission to share at any time.
- All users in the system must have a user ID and password to access the system. There are also extensive technology mechanisms in place to protect your data from unauthorized access.
- In addition, agencies have policies and procedures in place to monitor and restrict who has access to your information and ensure confidentiality.

**How your data will be used or disclosed:**

Your client data may be used or disclosed for (1) case management, (2) administrative, (3) billing, and (4) analytical purposes. Uses involve sharing parts of your information with persons within our agency. Disclosures involve sharing parts of your information with persons or organizations outside of our agency.

- **Case Management Uses and Disclosures:** We may use or disclose your information for case management purposes associated with providing or coordinating services for you. Unless you request that your record remain hidden, your personal identifiers will be disclosed to other HMIS agencies so they can easily locate your record if you go to them for services. Beyond your identifiers, this agency will only share your information with other agencies with your written consent.
- **Administrative Uses and Disclosures:** We may use your information internally to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions. Your information will be stored on a central statewide case management database; as such your information will be disclosed for system administration purposes to employees or contractors who administer the central database.
- **Billing Uses and Disclosures** include functions related to payment or reimbursement for services. An example might include generating aggregate reports for the people and organizations that fund our agency. Your personal information may be disclosed for billing purposes, if required by the funding source.
- **Analytical Uses and Disclosures:** We may use your information for internal analysis. An example would be analyzing client outcomes to evaluate program effectiveness. We will disclose your personal identifiers to the central system administrators for uses related to creating de-identified protected personal information. We may disclose portions of your client information without the personal identifiers for analytical purposes related to analyzing client data, including, but not limited to, understanding trends in homelessness and needs of persons who are homeless, and assessing the implementation of North Dakota's 10-Year Plan to End Homelessness.

In accordance with the Housing and Urban Development Data and Technical Standards Final Notice, your information may also be used or disclosed for such purposes as (1) required by law, (2) necessary to avert a serious threat to health or safety, (3) reporting victims of abuse, neglect or domestic violence, (4) relating to academic research, and (5) in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer or a grand jury subpoena.

Your client record will be stored on the HMIS system with your personal identifiers for a period of seven years from the time it was last modified. Beyond that point, all personally identifying information will be removed and the remaining information will only be retained in a de-identified format.

**Right to File a Complaint**

You have the right to file a complaint about the policies contained within this Notice or to file a grievance about any person who you believe is violating this Notice.

**Revisions to this Notice of Uses and Disclosures**

This Notice may be amended at any time and amendments may affect information obtained from you prior to the date of the change. An amendment will be effective to all information previously collected, unless otherwise stated. We will maintain a record of all amendments to this Notice, and can provide it upon request.

**Please direct any questions or concerns about HMIS to any agency staff member.**