



HMIS Notice of Privacy Practices

Cambridge, MA CoC
Homeless Management Information System (HMIS)

THIS PRIVACY NOTICE EXPLAINS UNDER WHAT CIRCUMSTANCES WE MAY SHARE AND DISCLOSE YOUR INFORMATION FROM THE CAMBRIDGE HMIS. THIS NOTICE ALSO EXPLAINS YOUR RIGHTS REGARDING YOUR CONFIDENTIAL INFORMATION.

PLEASE READ IT CAREFULLY.

If you have any questions about this Notice, you may contact either your service provider, or:

Cambridge Continuum of Care
51 Inman Street, Cambridge, MA 02139
617-349-6206
PlanningDev@cambridgema.gov

This Notice describes standards for the privacy of personal information collected and stored in the Cambridge Continuum of Care ("CoC") Homeless Management Information System ("HMIS"), as well as personal information collected for the purposes of the Cambridge Continuum of Care Coordinated Entry System (Cambridge Coordinated Access Network ("C-CAN")).

We ask for your permission to share confidential personal information that we collect about you (and members of your household, if applicable) with other providers using the same system. This confidential information is referred to as Personally Identifiable Information ("PII"). We are required to protect the privacy of your PII by complying with the privacy practices described in this Privacy Notice.

THE TYPE OF INFORMATION WE COLLECT IN HMIS

We collect and share both PII and general information obtained during your intake and assessment, which may include but is not limited to:

- Name and contact information
- Social security number
- Birthdate
- Demographic information such as gender and race/ethnicity
- History of homelessness and housing (including current housing status and where and when services have been accessed)
- Self-reported medical history including any mental health and substance abuse issues
- Case notes and services
- Case manager's contact information



- Income sources and amounts; and non-cash benefits
- Veteran status
- Disability status
- Household composition
- Emergency contact information
- Domestic violence history
- Photo (optional)
- Uploaded documents pertaining to housing applications and placement eligibility

HOW YOUR PERSONAL INFORMATION IS PROTECTED IN HMIS

Your information is protected by passwords and encryption technology. Each HMIS user and participating organization must sign an agreement to maintain the security and privacy of your information. Each HMIS user or participating organization that violates the agreement may have access rights terminated and may be subject to further penalties.

HOW WE MAY USE AND DISCLOSE YOUR INFORMATION

For Housing: We create a record of your information including housing services you receive at our partner agencies. We need this record to provide you with quality services and to comply with certain legal requirements. Your service provider may use or disclose your information to other personnel who are involved in providing services for you. For example, a housing navigator may need to know disability information to provide appropriate housing resources. We also may use and disclose your information to people outside this agency who may be involved in your service coordination when you access services from our partner agencies.

For Streamlined Service Provision: We may use or disclose basic information about you so that you do not have to provide information more than once. This sharing, only when you access one of the participating agencies, can help avoid duplication of services and referrals that you are already receiving.

For Administrative Operations: We may use and disclose information for functions related to payment or reimbursement for services and to carry out functions including but not limited to legal, audit, personnel, oversight and management functions.

USES AND DISCLOSURES THAT DO NOT REQUIRE YOUR AUTHORIZATION

Data Retrieval: Cambridge HMIS will generate reports required by HUD, the CoC and other stakeholders. This will be at the level that does not identify individuals but can provide statistical data. The HMIS Lead Agency staff has access to retrieve all data in the Cambridge HMIS. The HMIS Lead Agency will protect client confidentiality in all reporting. Partner Agencies may also retrieve HMIS data entered to produce statistical reports including number of clients served for internal purposes, grant applications and other required reports, within the parameters of their own agency's program enrollments and services.



Data Transfer: The Cambridge CoC participates in the Rehousing Data Collective (RDC), a statewide data warehouse operated by the Department of Housing & Community Development (DHCD). HMIS data including PII are exported from HMIS to the RDC in accordance with its agreement with DHCD. Records transmitted to the warehouse are locked and PII is visible only to the RDC System Administrator and authorized staff from the software vendor (Green River) for purposes of deduplicating and deidentifying records for statewide research and reporting. Individuals may authorize disclosure of their PII to assist in service coordination if they receive services in multiple communities, but PII cannot be shared by the warehouse administrators without an individual's permission documented by a separate signed *Authorization for Disclosure of Personal Information* that pertains only to this warehouse.

Academic Research or Evaluation Purposes: Under certain circumstances, we may use and disclose information about you for research purposes. Any research/evaluation on the nature and patterns of homelessness (at the CoC-wide level) that uses PII HMIS data will take place only on the basis of specific agreements between researchers and the Cambridge HMIS Lead. These agreements must be approved by the HMIS Working Group and the CoC Board and must reflect adequate standards for the protection of confidentiality of data.

As Required by Law: We will use and disclose information when required to do so by federal or state law or regulation.

To Avert a Serious Threat to Health or Safety: We may, consistent with applicable law and standards of ethical conduct, use or disclose PII if:

- (1) the CoC in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and
- (2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

OTHER USES OF YOUR INFORMATION

Other uses and disclosures of your information not covered by this Notice or the laws that apply to us will be made only with your written authorization. If you provide us authorization to disclose your information, you may revoke that authorization, in writing, at any time. If you revoke your authorization, we will no longer use or disclose your information for the reasons covered by the authorization, except that, we are unable to take back any disclosures we have already made when the authorization was in effect, and we are required to retain our records of the services that we provided to you.



YOUR RIGHTS TO YOUR INFORMATION IN HMIS

Right to Revoke your Consent for Sharing Information in the HMIS: You may revoke your consent at any time. Your revocation must be provided either in writing or by completing the Revocation of Consent form. Upon receipt of your revocation, we will remove your PII from the shared HMIS database and prevent further PII from being added. The PII that you previously authorized to be shared cannot be entirely removed from the HMIS database and will remain accessible to the limited number of organization(s) that provided you with direct services.

Right to a Paper Copy of This Notice: You may ask us for a paper copy of this Notice at any time. To obtain a paper copy of this Notice, ask any staff person. You may also obtain a copy of this Notice at our website at <https://cambridgecoc.org/policies-and-procedures/>.

Right to a List or Partner Agencies: A current list of participating organizations that have access to your HMIS data can be obtained by asking a staff person, or going to <https://cambridgecoc.org/hmis-participating-agencies/>.

Right to Inspect and Obtain Copies: You have the right to inspect and obtain a copy of Personally Identifying and Program Enrollment information for services we have provided to you.

Right to Request an Amendment: If you feel that your information in our records is incorrect or incomplete, you may ask us to amend the information. You have the right to request an amendment for as long as we keep the information. To request an amendment, you must submit a request in writing to your service provider.

Right to File a Complaint if you have a Grievance: If you believe your privacy rights have been violated, you may send a written grievance to this organization. You will not be retaliated against for filing a grievance. If your grievance is not resolved to your satisfaction, you may send a written grievance appeal to the Cambridge Continuum of Care, Planning and Development Office, City of Cambridge, 51 Inman Street, Cambridge, MA 02139.

CHANGES TO THIS NOTICE

The policies in this notice may be amended at any time. These amendments may affect information obtained by this organization before the date of the change. Amendments regarding use or disclosure of PII will apply to information (data) previously entered in HMIS, unless otherwise stated. All amendments to this privacy notice must be consistent with the requirements of the federal HMIS privacy standards. This organization must keep permanent documentation of all privacy notice amendments.