Cambridge Continuum of Care (CoC) Privacy and

Data Sharing Overview

**How does our CoC share data in HMIS?**

Data sharing is the ability to use personally identifiable information (PII) from one organization to another for specific purposes, as defined in our current HMIS Privacy Statement (aka Desk Sign) and more detailed HMIS Notice of Privacy Policy. Data sharing is intended to meet the needs of clients, projects and the system while protecting and respecting client choice regarding how their personal information is managed.

Currently, the Cambridge HMIS is configured to only share a limited amount of data across agencies – the data found on the client profile in Clarity that identifies them (first and last name, SSN, DOB, veteran status, etc.). This degree of sharing helps us have an unduplicated count of persons that is essential for all system reporting. Other data currently shared shows staff whether a client has been enrolled in Cambridge CAN. This is shown through visible dates of enrollments in the C-CAN project, dates and names of assessments, and referral listings. If a client has signed a separate ROI for C-CAN participation, the Coordinated Access Specialist is able to view their enrollments and service history across our system.

**What are the recommended changes to how we share data in HMIS?**

To improve coordination and how we help clients access services, Cambridge CoC and HMIS Lead staff have worked with HUD appointed technical assistance providers to revise our HMIS and Coordinated Access privacy and security policies. These revisions were informed by issued guidance from HUD in their [SNAPS Data TA Strategy to Improve Data and Performance](https://www.hudexchange.info/resource/5748/snaps-data-ta-strategy-to-improve-data-and-performance/) document and [Coordinated Entry Management and Data Guide](https://www.hudexchange.info/resource/5758/coordinated-entry-management-and-data-guide/). These documents informed conversations with the HMIS Working Group, and in 2019, they approved an increase in sharing across agencies and related changes to the client consent forms and process.

In order to facilitate better coordination and a more streamlined intake process for staff and clients, the changes will allow agency staff to see enrollment history across each other’s agencies, as well as contact information, including emergency contact, case manager, etc. The same level of C-CAN enrollment information will be shared as it is presently, but housing navigators working in C-CAN will be able to see a more complete picture of clients enrollments in shelters, street outreach projects and most other participating programs in Clarity. When clients give consent to share among our partner agencies, staff can also identify who they are working with in other programs and communicate with them directly and securely in Clarity on behalf of their clients.

**What are the biggest changes in the updated privacy policy and client release?**

The new client consent form combines HMIS, C-CAN and photo authorizations – currently existing as three documents -- into one.

The consent form and privacy policy are more informative about a client’s rights regarding HMIS data collection, including their right to review their own records, request an amendment and file a grievance.

Both documents more specifically state what is being shared across agencies if they consent. The policy is more detailed in informing the client of disclosures that may occur without their permission, including what may occur during public health emergencies.

The new method of informed consent will require intake staff to sign the form as a witness, showing that they were responsible for discussing the consent process and providing an overview of our privacy policy, if needed. If the client does not consent, staff still need to sign the form to show that they completed the process of informing clients and document this in the client’s record in Clarity.

The Privacy Policy includes information about our CoC’s participation in the Rehousing Data Collective, the Statewide Data Warehouse administered by the Department of Housing and Community Development (DHCD).

**What is the value of sharing data?**

Data sharing helps agencies coordinate client services, cuts down on redundant questions asked of clients, enhances our coordinated access system, increases the effectiveness of referrals, and improves data quality.

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| **Enhance Coordinated Access and Client Care**   * Document chronic homelessness * Help staff, including housing navigators, have more comprehensive information about their clients * Reduce duplication of services * Ability to see a client’s participation across the state with access to the Rehousing Data Collective and use with clients to establish care plans, etc. | **Improve Data Quality**   * Reduce duplicate client records * Highlights to staff the interdependence of their agency’s data with the other partner agencies and the CoC as a whole system * Emphasizes the importance of timeliness of all agency data entry in order to meet needs of C-CAN clients |