**Fredericksburg Regional Continuum of Care**

**Homeless Management Information Services (HMIS)**

Privacy Notice (Version 1.0)

Agency Information

Agency Name:

Address:

City, State, Zip Code:

HMIS Lead Agency

George Washington Regional Commission

406 Princess Anne St.

Fredericksburg, VA 22401

**How your information in the HMIS may be used**

Agencies that use HMIS share basic information with other agencies, such as Name, Social Security number, Date of Birth, and Gender. Unless restricted by law or by the person who contributes that personal information, HMIS client data may be used or disclosed for (1) case management, (2) administrative, (3) billing, (4) analytical and (5) other purposes as permitted or required by law or authorized by you. Uses involve sharing parts of client information with persons within an agency. Disclosures involve sharing parts of client information with persons or organizations outside an agency.

* **Case Management Uses and Disclosures:** Agencies may use or disclose client information for case management purposes associated with providing or coordinating services. Unless a client requests that his/her record remain hidden, personal identifiers will be disclosed to other HMIS agencies so other agencies can easily locate the client’s record if he/she goes to them for services. Beyond personal identifiers, each agency can only disclose client information with other agencies with written client consent or other specific waiver.
* **Administrative Uses and Disclosures:**  Agencies may use or disclose client information internally to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions. Client information will be stored on a central regional case management database; client information will be disclosed for system administration purposes to the HMIS Lead Agency who administers the central database.
* **Billing Uses and Disclosures:** Agencies may use or disclose client information for functions related to payment or reimbursement for services. An example might include generating aggregate reports for the people and organizations that fund an agency. A client’s personal information may be disclosed for billing or reimbursement purposes, if required by the funder/billing agency.
* **Analytical Uses and Disclosures:** Agencies may use client information for internal analysis. For example, analyzing client outcomes to evaluate program effectiveness, analyzing client data to understand trends in homelessness and needs of persons who are homeless. Agencies will also disclose client personal identifiers to the HMIS Lead Agency or HMIS Vendor for uses related to creating an unduplicated database on clients served within the system, ultimately resulting in the creation of de-identified personal information.
* **Academic Research Uses and Disclosures:** Agencies may disclose client information to an individual or institution for academic research conducted under a written research agreement approved in writing by the Agency. The agreement would establish rules and limitations for processing and ensure the security of client information during research as well as the return or proper disposal of client information at the conclusion of the research.
* **As Required by Law:** Agencies may disclose your personal information to comply with requirements of law.
* **To Avert a Serious Threat to Health and Safety:** Agencies may disclose your personal information if this agency believes it is necessary to prevent or lessen a serious an imminent threat to the health and safety of an individual or the public, and if that information can be disclosed to a person who is reasonably able to prevent or lessen that threat.
* **To Report Victims of Abuse, Neglect or Domestic Violence:** Agencies may disclose your information to an agency authorized by law to receive reports of abuse, neglect or domestic violence if this agency believes you are a victim of abuse, neglect or domestic violence. This agency may only disclose information in this circumstance if (1) the disclosure is required by law, (2) if you agree to the disclosure, or (3) if this agency believes the disclosure is necessary to prevent serious harm.
* **For Law Enforcement Purposes:** Agencies may disclose your information to law enforcement entities only in response to appropriate legal requests. A subpoena or court order may be required, but the disclosure must meet the minimum standards necessary for the immediate purpose and not disclose other information about the individuals.

A client record will be stored on the HMIS system with 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 de-identified format. Unless information is required to be shared due to agency policy or as a condition of a provider agreement, you may revoke your consent to share information with other agencies at any time in writing, except if the agency has already released information as a result of your consent.

**Your rights regarding your information in the HMIS**

* You have the right to inspect and obtain a copy of your own protected personal information for a s long as it is kept in the HMIS, except for information compiled in reasonable anticipation of, or for use in, a legal proceeding. You have a right to have any information explained to you in detail.
* You have the right to correct your protected personal information when the information in the record is inaccurate or incomplete.
* You have the right to request that reasonable accommodations be made to you regarding this and other HMIS data collection forms, including access to a qualified sign language interpreter, readers of materials in Braille, audio, or large type, as needed if you are an individual with a disability.

**Exercising your rights regarding your information in the HMIS**

You can exercise these rights by making a written request to this agency, or by making a written request to the HMIS Lead Agency. The address for each is listed at the beginning of this Notice.

**Enforcement of your privacy rights**

If you believe your privacy rights have been violated, you may send a written complaint to this agency. If your complaint is not resolved to your satisfaction by the initial agency, you may send your written complaint to the HMIS Lead Agency. The address is listed at the beginning of this Notice. You will not be penalized for filing a complaint.

**Revisions to this Notice**

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.