HMIS Client Privacy and Data Ethics Training

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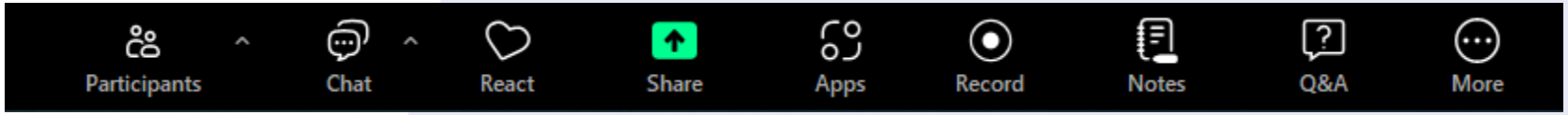
Q&A



To better organize questions the HMIS Help Desk receives during the meeting, our Team recommends that you submit your questions through the Q&A option.

We request that you keep your questions general and related to the topics discussed in the meeting.

Agency specific questions are best supported through an Orange County HMIS Help Desk ticket submission, so our Team is able to further investigate and provide assistance especially if it includes client identifying information.

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Agenda

1. HMIS Security Best Practices
2. Client Privacy Best Practices
3. Using and Disclosing Client Information
4. Client Consent to Share Protected Personal Information
5. Client Record Privacy and Sharing Settings
6. Client Record Requests
7. HMIS Grievance Process
8. HMIS Privacy and Data Ethics Training Survey
9. Q&A

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Meeting materials and recording will be available on the OC HMIS website

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HMIS Security Best Practices

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HMIS Security

Overview:

The Homeless Management Information System (HMIS) is a secure database used to store client protected personal information (PPI) such as client names, dates of birth (DOB), and social security numbers (SSN).

Orange County Clarity is an encrypted centralized database, operated by Bitfocus. The OC HMIS team oversees its management in Orange County as the HMIS lead agency.

HMIS complies with the Health Insurance Portability and Accountability Act (HIPPA), the Violence Against Women and Department of Justice Reauthorization Act (VAWA), and all federal, state, and local confidentiality laws.

Navigate to ochmis.org › HMIS Forms and Documents › HMIS Policy and Privacy Forms › OC HMIS Policies and Procedures

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HMIS Security

Security Best Practices for HMIS Participating Agencies:

Agencies must adhere to the technical standards below for any equipment used to access HMIS:

- Virus Protection software that is updated weekly, performs scans daily, and automatically updates to the most current version.
- Must have a firewall in place between any computer and internet connection for the entire network.
- Password Protected Screensaver (within 5 min of inactivity).
- Operating system (Windows or Mac) less than 5 years old.
- All computer terminals used to access HMIS should be stored in a secure location.
- All computers used to access HMIS that are accessible to the public (front desk area, etc.) must be closely monitored by staff to prevent unauthorized access.

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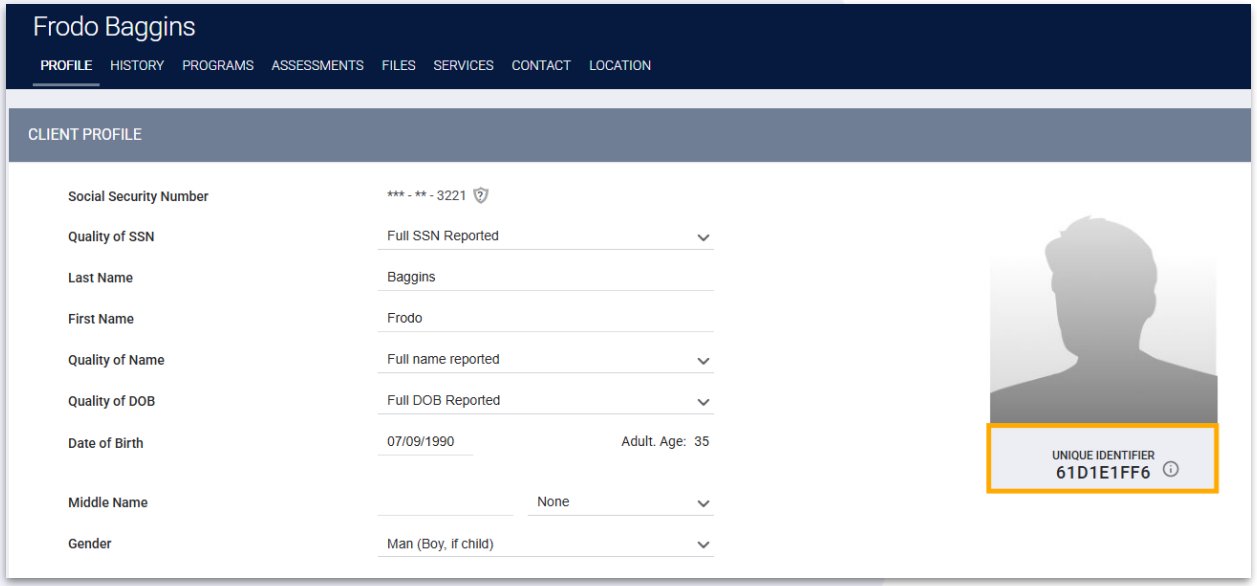
HMIS Security

Security Best Practices for All Users:

- Users should never share their HMIS password with anyone for any reason.
- Users must lock their computer while stepping away.
- Any physical client files must be stored in a locked cabinet or office.
- Never disclose client PPI across an unencrypted network by email or text (most public wifi).
    - Can send it via an encrypted or password protected email on work network **OR**
    - Use Unique Identifier only.



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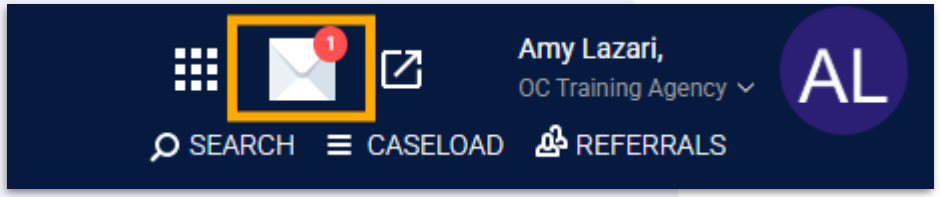
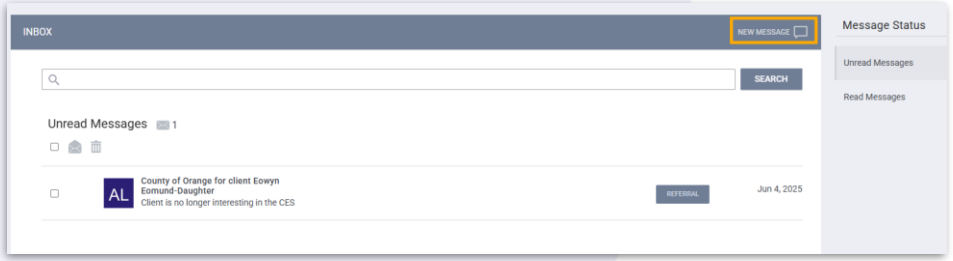
HMIS Security

Security Best Practices for All Users:

Users can also use the messaging system available within HMIS.

- Because HMIS Clarity is an encrypted platform, users can communicate using names, DOBs, or SSN linked with the client.





Review the [Messaging within HMIS Knowledge Base Article].

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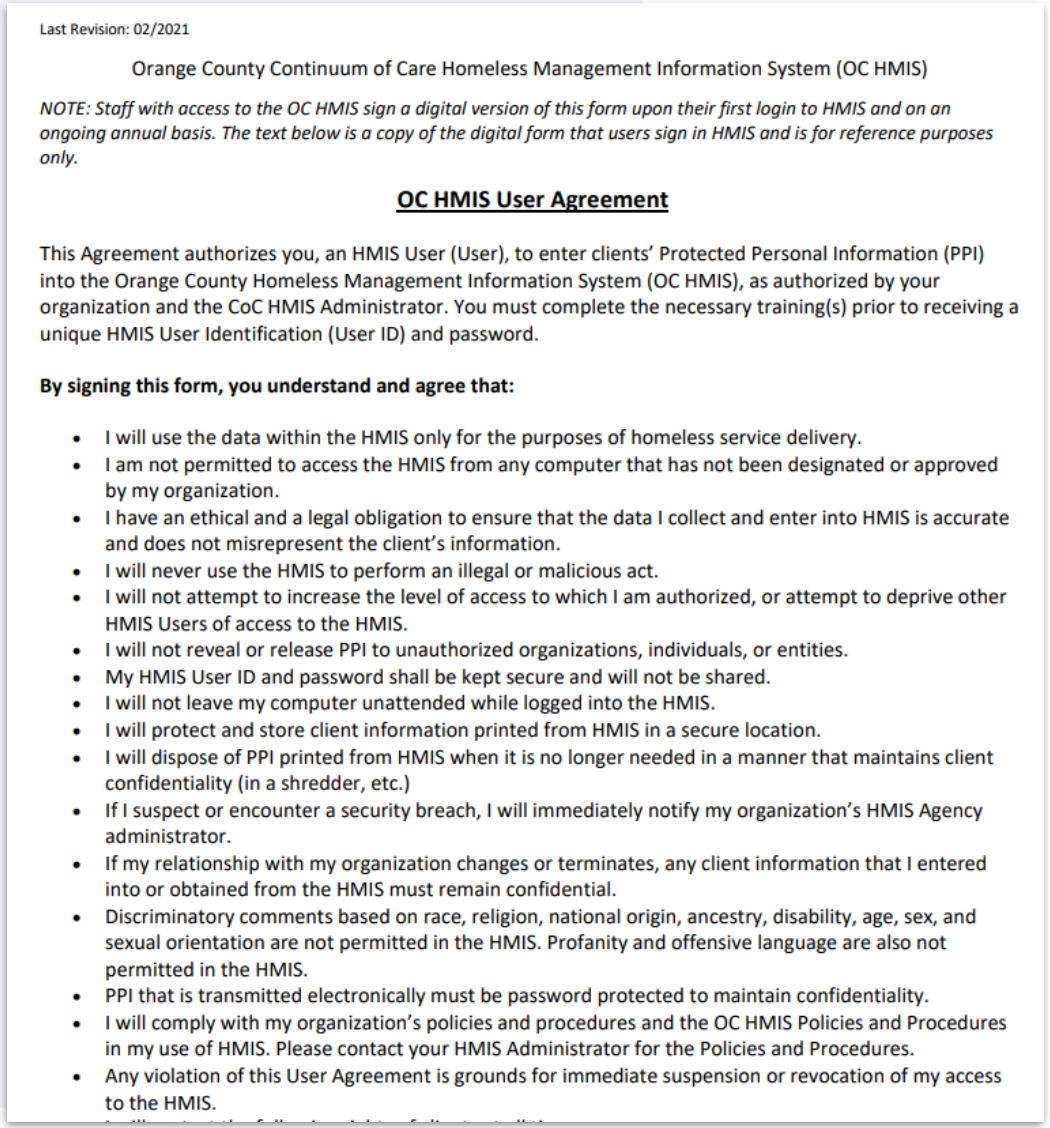
HMIS Security

To gain access to HMIS, users at HMIS agencies must complete the required HMIS trainings for their access role type and sign the HMIS User Agreement.

More information about HMIS Trainings are available from the New Staff Onboarding Knowledge Base Article.

HMIS User Agreement – outlines the HMIS User's responsibilities in protecting client data and upholding informed consent.

Must be signed during each user's first log-in to HMIS, and renewed annually.



Last Revision: 02/2021

Orange County Continuum of Care Homeless Management Information System (OC HMIS)

NOTE: Staff with access to the OC HMIS sign a digital version of this form upon their first login to HMIS and on an ongoing annual basis. The text below is a copy of the digital form that users sign in HMIS and is for reference purposes only.

OC HMIS User Agreement

This Agreement authorizes you, an HMIS User (User), to enter clients' Protected Personal Information (PPI) into the Orange County Homeless Management Information System (OC HMIS), as authorized by your organization and the CoC HMIS Administrator. You must complete the necessary training(s) prior to receiving a unique HMIS User Identification (User ID) and password.

By signing this form, you understand and agree that:

- I will use the data within the HMIS only for the purposes of homeless service delivery.
- I am not permitted to access the HMIS from any computer that has not been designated or approved by my organization.
- I have an ethical and a legal obligation to ensure that the data I collect and enter into HMIS is accurate and does not misrepresent the client's information.
- I will never use the HMIS to perform an illegal or malicious act.
- I will not attempt to increase the level of access to which I am authorized, or attempt to deprive other HMIS Users of access to the HMIS.
- I will not reveal or release PPI to unauthorized organizations, individuals, or entities.
- My HMIS User ID and password shall be kept secure and will not be shared.
- I will not leave my computer unattended while logged into the HMIS.
- I will protect and store client information printed from HMIS in a secure location.
- I will dispose of PPI printed from HMIS when it is no longer needed in a manner that maintains client confidentiality (in a shredder, etc.)
- If I suspect or encounter a security breach, I will immediately notify my organization's HMIS Agency administrator.
- If my relationship with my organization changes or terminates, any client information that I entered into or obtained from the HMIS must remain confidential.
- Discriminatory comments based on race, religion, national origin, ancestry, disability, age, sex, and sexual orientation are not permitted in the HMIS. Profanity and offensive language are also not permitted in the HMIS.
- PPI that is transmitted electronically must be password protected to maintain confidentiality.
- I will comply with my organization's policies and procedures and the OC HMIS Policies and Procedures in my use of HMIS. Please contact your HMIS Administrator for the Policies and Procedures.
- Any violation of this User Agreement is grounds for immediate suspension or revocation of my access to the HMIS.

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HMIS Security

Security Best Practices for HMIS Agency Administrators

- Ensure that all devices used by agency staff meet the security standards outlined in the OC HMIS Policies and Procedures.
- Escalate any security violations reported by HMIS Users to OC HMIS via the Data Breach Incident Form.
- Maintain an agency-wide process for destroying client documents with client PPI after the 7 years specified in HUD's Privacy and Security Standards.
- Submit the HMIS Account Update & Testing Form to request account updates for any users who require a change in access type or deactivation for users no longer work for the agency.
- Use the HMIS Dropbox folder for sharing client PPI.
    - No PPI attached to Help Desk tickets (including screenshots with client PPI).
    - Review the How to Access your Agency's Dropbox Folder Knowledge Base Article.

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HMIS Security

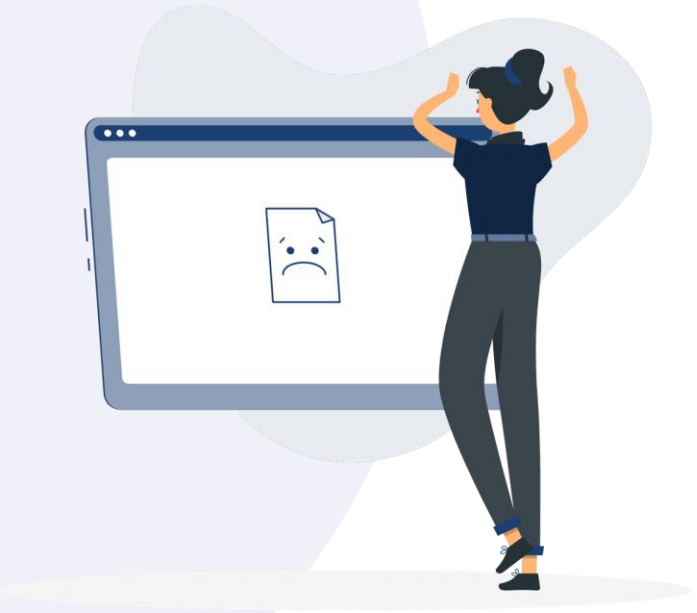
HMIS Data Breaches:

A data breach is the unauthorized access or sharing of client information that compromises the security, confidentiality, or integrity of data in HMIS.

Data breaches could include but are not limited to:

- HMIS Users sharing HMIS account and/or passwords with others.
- Sharing client identifying information with anyone that doesn't have access to HMIS.
- Sharing client identifying information over an unencrypted network.
- Leaving printed documents with client identifying information in an unsecured location.

Any suspected data breaches must be reported to OC HMIS and users who violate HMIS data security may be subject to immediate suspension or revocation of access to HMIS.



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HMIS Security

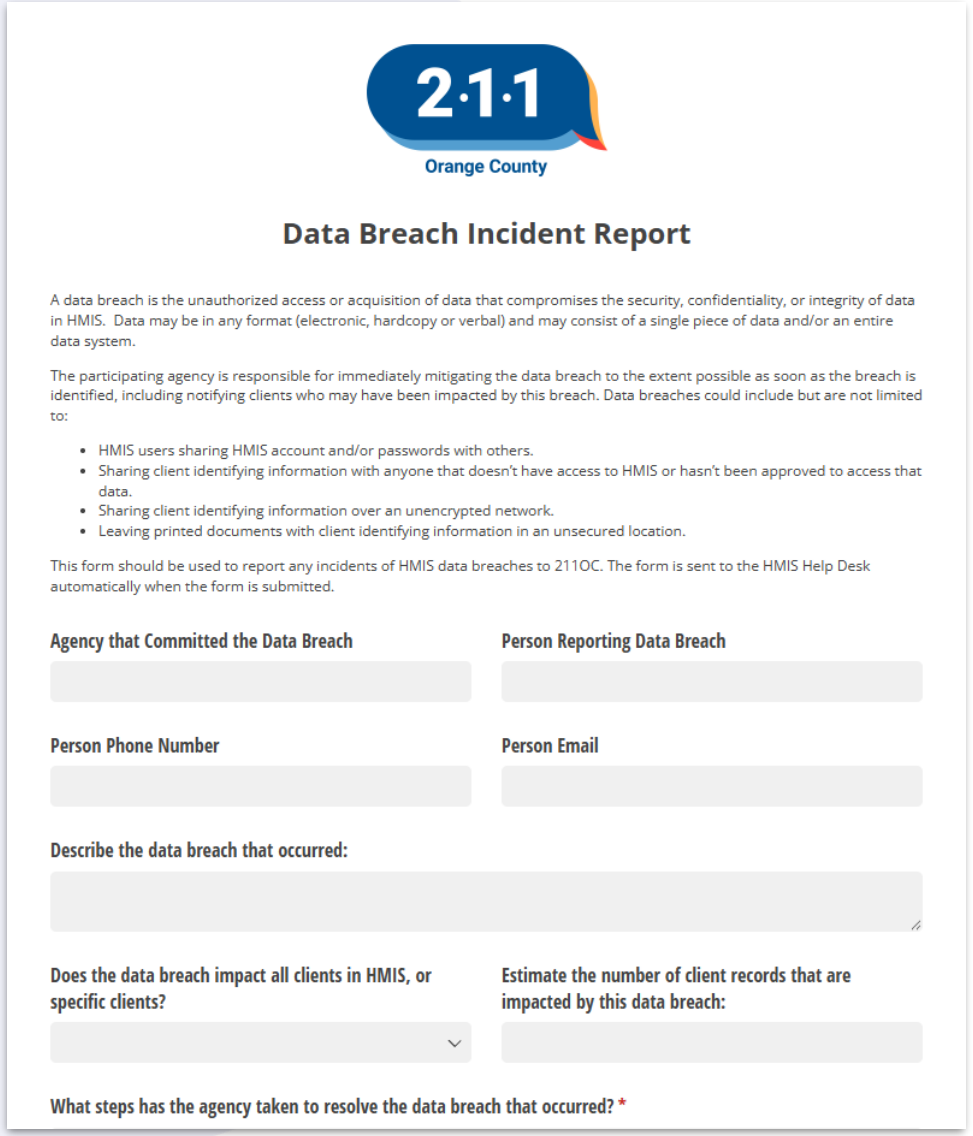
How to Report HMIS Data Breaches

If a data breach incident occurs, the Agency Administrator should notify OC HMIS using the **Data Breach Incident Report** form.

The form is sent to the HMIS Help Desk automatically upon submission.

To locate the HMIS Data Breach Incident Form go to:

ochmis.org› HMIS Forms and Documents› For Agencies/Projects Currently Set Up in HMIS › Data Breach Incident Report.



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Data Breach Incident Report

A data breach is the unauthorized access or acquisition of data that compromises the security, confidentiality, or integrity of data in HMIS. Data may be in any format (electronic, hardcopy or verbal) and may consist of a single piece of data and/or an entire data system.

The participating agency is responsible for immediately mitigating the data breach to the extent possible as soon as the breach is identified, including notifying clients who may have been impacted by this breach. Data breaches could include but are not limited to:

- HMIS users sharing HMIS account and/or passwords with others.
- Sharing client identifying information with anyone that doesn't have access to HMIS or hasn't been approved to access that data.
- Sharing client identifying information over an unencrypted network.
- Leaving printed documents with client identifying information in an unsecured location.

This form should be used to report any incidents of HMIS data breaches to 211OC. The form is sent to the HMIS Help Desk automatically when the form is submitted.

Agency that Committed the Data Breach

Person Reporting Data Breach

Person Phone Number

Person Email

Describe the data breach that occurred:

Does the data breach impact all clients in HMIS, or specific clients?

Estimate the number of client records that are impacted by this data breach:

What steps has the agency taken to resolve the data breach that occurred? *

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Client Privacy Best Practices

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Client Privacy Best Practices

Use the HMIS Privacy forms to explain client privacy rights and obtain informed consent.

- Consent to Share Protected Personal Information (PPI)
- Privacy Notice
- Client Revocation of Consent Form
- HMIS Grievance Form

ochmis.org > HMIS Forms and Documents > HMIS Policy and Privacy Forms.

HMIS Policy and Privacy Forms

HMIS Policies and Procedures	English		
HMIS Participating Agencies Schedule	Schedule		
HMIS User Agreement	User Agreement		
Consent to Share Protected Personal Information	English	Spanish	Vietnamese
Note Regarding Collection of Personal Information	English	Spanish	
Privacy Notice	English	Spanish	Vietnamese
Grievance Form	English	Spanish	Vietnamese
Client Revocation of Consent Form	English	Spanish	

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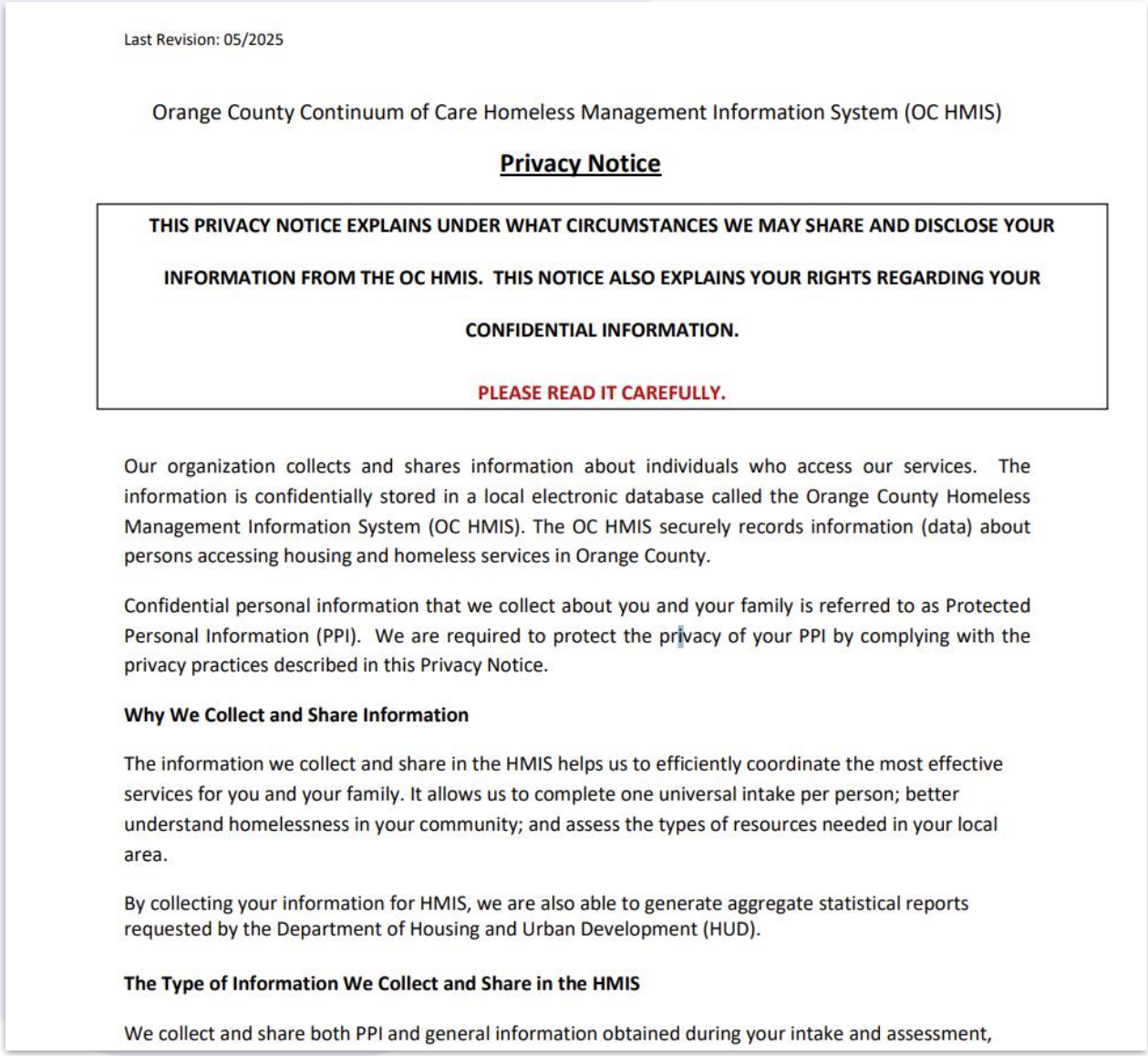
Client Privacy Best Practices

The Privacy Notice explains:

- Why we collect and share Protected Personal Information (PPI)
- Type of PPI collected
- How PPI is protected in HMIS
- How PPI may be shared and disclosed
- Explanation of why consent is needed
- Client privacy rights



Last Revision: 05/2025

Orange County Continuum of Care Homeless Management Information System (OC HMIS)

Privacy Notice

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

PLEASE READ IT CAREFULLY.

Our organization collects and shares information about individuals who access our services. The information is confidentially stored in a local electronic database called the Orange County Homeless Management Information System (OC HMIS). The OC HMIS securely records information (data) about persons accessing housing and homeless services in Orange County.

Confidential personal information that we collect about you and your family is referred to as Protected Personal Information (PPI). We are required to protect the privacy of your PPI by complying with the privacy practices described in this Privacy Notice.

Why We Collect and Share Information

The information we collect and share in the HMIS helps us to efficiently coordinate the most effective services for you and your family. It allows us to complete one universal intake per person; better understand homelessness in your community; and assess the types of resources needed in your local area.

By collecting your information for HMIS, we are also able to generate aggregate statistical reports requested by the Department of Housing and Urban Development (HUD).

The Type of Information We Collect and Share in the HMIS

We collect and share both PPI and general information obtained during your intake and assessment,

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Client Privacy Best Practices

HMIS Agency Administrator Best Practices:

Agency Administrators must monitor compliance with standards of confidentiality and data collection, entry, and retrieval outlined in the OC HMIS Policies and Procedures.

- Agency Administrators must ensure that staff use the privacy forms that contain the most recent revision date.
- Ensure the Privacy Notice is visible in all areas where HMIS data entry occurs and is accessible on the agency's website.
- Ensure staff keep accessible physical copies of the Client Consent, Revocation of Consent, and HMIS Grievance forms.
- Ensure all HMIS Users at the agency are able to clearly explain the purpose and benefit of HMIS and the related HMIS Consent Form to clients.

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Client Privacy Best Practices

Privacy Practices for ALL HMIS Users:

- All HMIS Users must be able to clearly explain the purpose and benefit of HMIS and the related HMIS Consent Form as detailed in the Client Privacy section.
    - What is HMIS?
    - What personal identifying data will be collected and how it will be used?
    - Privacy and confidentiality standards
    - Revocation of consent and how to do it
- Ensure clients have the opportunity to review and ask questions about each of the privacy forms during intake.
- Remind clients that they have the right to deny or revoke their consent at any time and that their decision to share their PPI will not affect their ability to receive *most services. ***Most services that do not require certain data for program eligibility*** For example, a PSH project may require information about disabilities or a program required to serve only elderly individuals may require a date of birth to ensure the individual is 62 or over.

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Using & Disclosing Client Information

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Using & Disclosing Client Data

Collecting client data can lead to questions about what information is entered into HMIS and how client information is used.

- Reassure clients that information added to HMIS is protected by encryption and strict privacy measures.
- Client consent is not required to collect PPI and create a client record to serve the client.
- Clients must sign the Consent to Share PPI in order for their PPI to be viewable by other HMIS participating agencies.

How PPI May Be Shared and Disclosed

Unless restricted by other laws, the information we collect can be shared and disclosed without your consent under the following circumstances:

- To provide or coordinate services.
- For payment or reimbursement of services for the participating organization.
- For administrative purposes, including but not limited to HMIS system administrator(s) and developer(s), and for legal, audit personnel, and oversight and management functions.
- For creating de-identified PPI.
- When required by law or for law enforcement purposes.
- To prevent a serious threat to health or safety.
- As authorized by law, for victims of abuse, neglect, or domestic violence.
- For academic research purposes.
- In a situation where you have requested access to your HMIS records through the Client Record Request process, and an agency will be providing you with those records.
- Other uses and disclosures of your PPI can be made with your written consent.

Providing Your Consent for Sharing PPI in the HMIS

Generally, to share your PPI in the OC HMIS, we must have your written consent. *Exception:*

- In a situation where we are gathering PPI from you during a phone screening, street outreach, or community access center sign-in, your verbal consent can be used to share your information in HMIS. If we obtain your verbal consent, you will be requested to provide written consent during your initial assessment. If you do not appear for your initial assessment, your information will remain in HMIS until you revoke your consent in writing.

You have the right to receive services even if you do not consent to share your PPI in the OC HMIS.

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Using & Disclosing Client Data

HMIS Users should make the client aware that PPI are collected and disclosed to prevent duplication of client records, coordinate care, and identify potential needs around disability or income capacity.

Examples of Client PPI:

- Clients' name and Clients' contact information
- Clients' social security number and date of birth
- Clients' basic demographic information such as age, race and ethnicity
- Clients' history of homelessness and housing (including Clients' current housing status)
- Clients' self-reported medical history and disability status
- Client photo and veteran status

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Using & Disclosing Client Data

When using client data to coordinate care it is also important to not inadvertently disclose client information in a manner that violates their privacy rights.

Certain data may not be considered PPI on their own but are considered PPI when combined.

Examples of inadvertent PPI disclosure:

- Unsecured message using client Initials with UID (e.g. FrBa 3A94DB1BD)
- Unsecured message using client initials with location (FrBa is at Palm Park)

Examples of appropriate communication:

- Using the client UID with non-PPI (3A94DB1BD is at Palm Park)
- Encrypting or password protected emails with PPI or HMIS Clarity Messaging.

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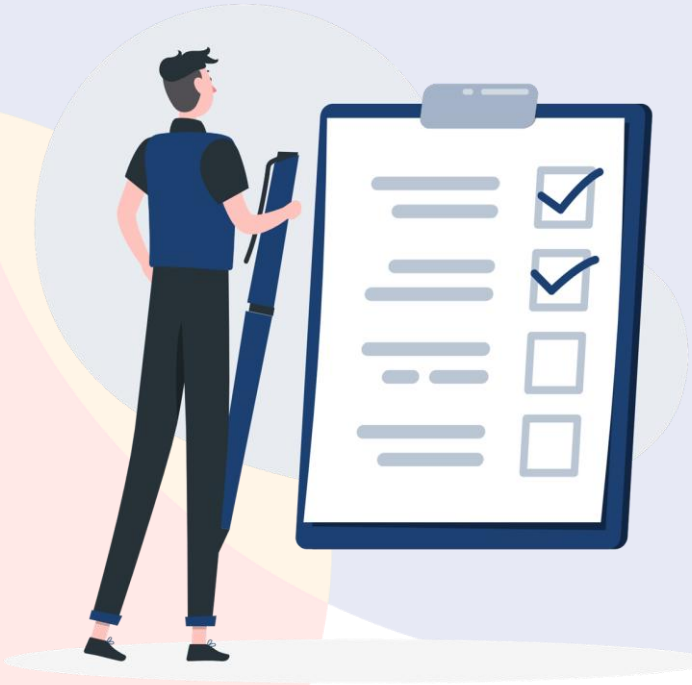
Client Consent to Share Protected Personal Information (PPI)



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Client Consent to Share PPI

Key Concepts:

- The Client Consent to Share Protected Personal Information (PPI) is required to **share client data with other HMIS agencies** via a shared "***public***" record.
- Agencies do not need a client to sign the Consent to Share Protected Personal Information form to create and enter their PPI into a record.
- Clients who ***refuse*** to sign the Consent to Share Protected Personal Information form can still be served by creating a ***private*** record.
- Similarly, any clients with an existing record, can still be served after revoking their consent via an anonymized profile.

Record privatization, anonymization, and consent settings will be covered in the next section.

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Client Consent to Share PPI

The Consent to Share Protected Personal Information Form is located on the OC HMIS website.

ochmis.org> HMIS Forms and Documents > HMIS Policy and Privacy Forms.

Versions are available in English, Spanish, and Vietnamese.

Clients should be offered the form in the language of their preference.

****Updated on a quarterly basis****

HMIS Policy and Privacy Forms

HMIS Policies and Procedures	English		
HMIS Participating Agencies Schedule	Schedule		
HMIS User Agreement	User Agreement		
Consent to Share Protected Personal Information	English	Spanish	Vietnamese
Note Regarding Collection of Personal Information	English	Spanish	
Privacy Notice	English	Spanish	Vietnamese
Grievance Form	English	Spanish	Vietnamese
Client Revocation of Consent Form	English	Spanish	

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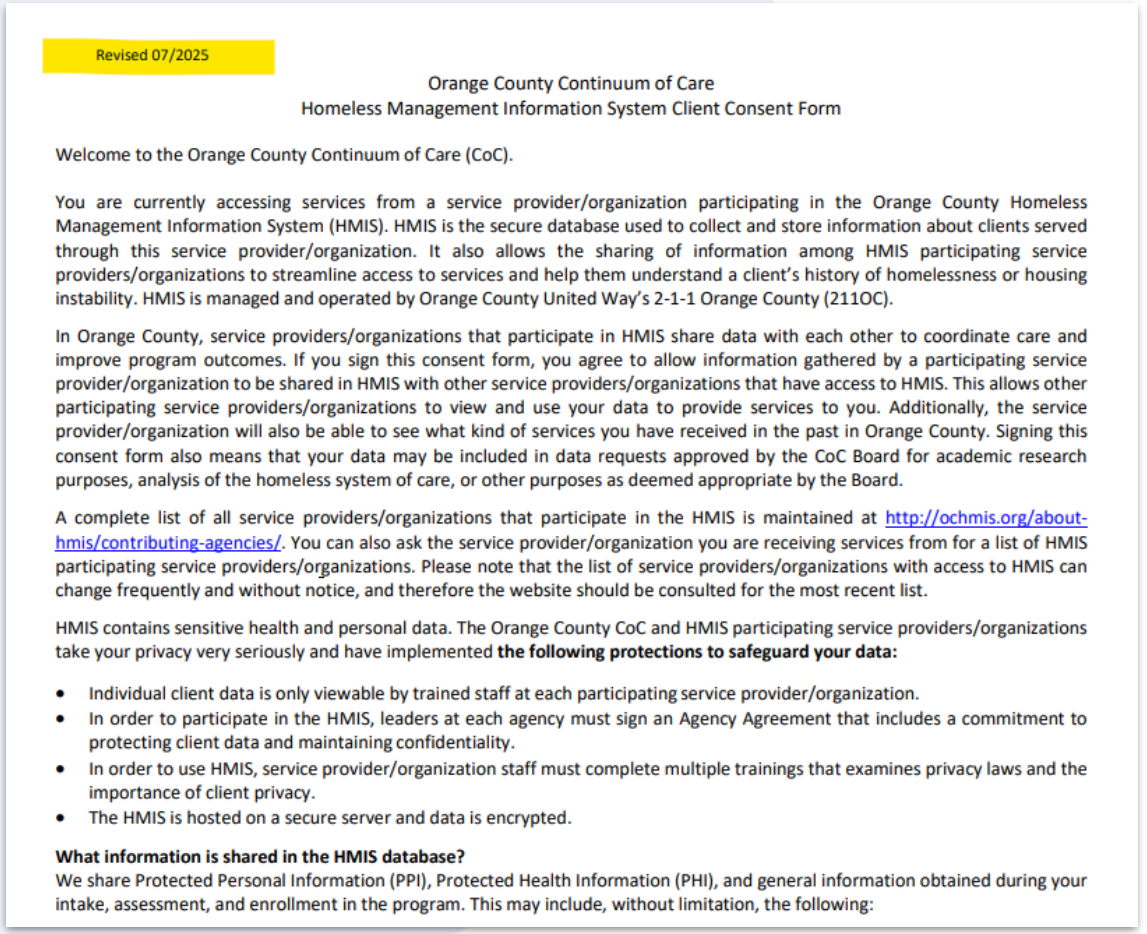
Client Consent to Share PPI

The Client Consent to Share PPI form must be reviewed with clients at intake.

- The right to receive services with or without signing the consent.
- The right to request a copy of their consent.
- The right to revoke their consent at any point.

If clients would like to view participating agencies, that list can be found on our website: ochmis.org > About > Agencies with Access to HMIS.



Revised 07/2025

Orange County Continuum of Care
Homeless Management Information System Client Consent Form

Welcome to the Orange County Continuum of Care (CoC).

You are currently accessing services from a service provider/organization participating in the Orange County Homeless Management Information System (HMIS). HMIS is the secure database used to collect and store information about clients served through this service provider/organization. It also allows the sharing of information among HMIS participating service providers/organizations to streamline access to services and help them understand a client's history of homelessness or housing instability. HMIS is managed and operated by Orange County United Way's 2-1-1 Orange County (211OC).

In Orange County, service providers/organizations that participate in HMIS share data with each other to coordinate care and improve program outcomes. If you sign this consent form, you agree to allow information gathered by a participating service provider/organization to be shared in HMIS with other service providers/organizations that have access to HMIS. This allows other participating service providers/organizations to view and use your data to provide services to you. Additionally, the service provider/organization will also be able to see what kind of services you have received in the past in Orange County. Signing this consent form also means that your data may be included in data requests approved by the CoC Board for academic research purposes, analysis of the homeless system of care, or other purposes as deemed appropriate by the Board.

A complete list of all service providers/organizations that participate in the HMIS is maintained at http://ochmis.org/about-hmis/contributing-agencies/. You can also ask the service provider/organization you are receiving services from for a list of HMIS participating service providers/organizations. Please note that the list of service providers/organizations with access to HMIS can change frequently and without notice, and therefore the website should be consulted for the most recent list.

HMIS contains sensitive health and personal data. The Orange County CoC and HMIS participating service providers/organizations take your privacy very seriously and have implemented **the following protections to safeguard your data:**

- Individual client data is only viewable by trained staff at each participating service provider/organization.
- In order to participate in the HMIS, leaders at each agency must sign an Agency Agreement that includes a commitment to protecting client data and maintaining confidentiality.
- In order to use HMIS, service provider/organization staff must complete multiple trainings that examines privacy laws and the importance of client privacy.
- The HMIS is hosted on a secure server and data is encrypted.

What information is shared in the HMIS database?
We share Protected Personal Information (PPI), Protected Health Information (PHI), and general information obtained during your intake, assessment, and enrollment in the program. This may include, without limitation, the following:

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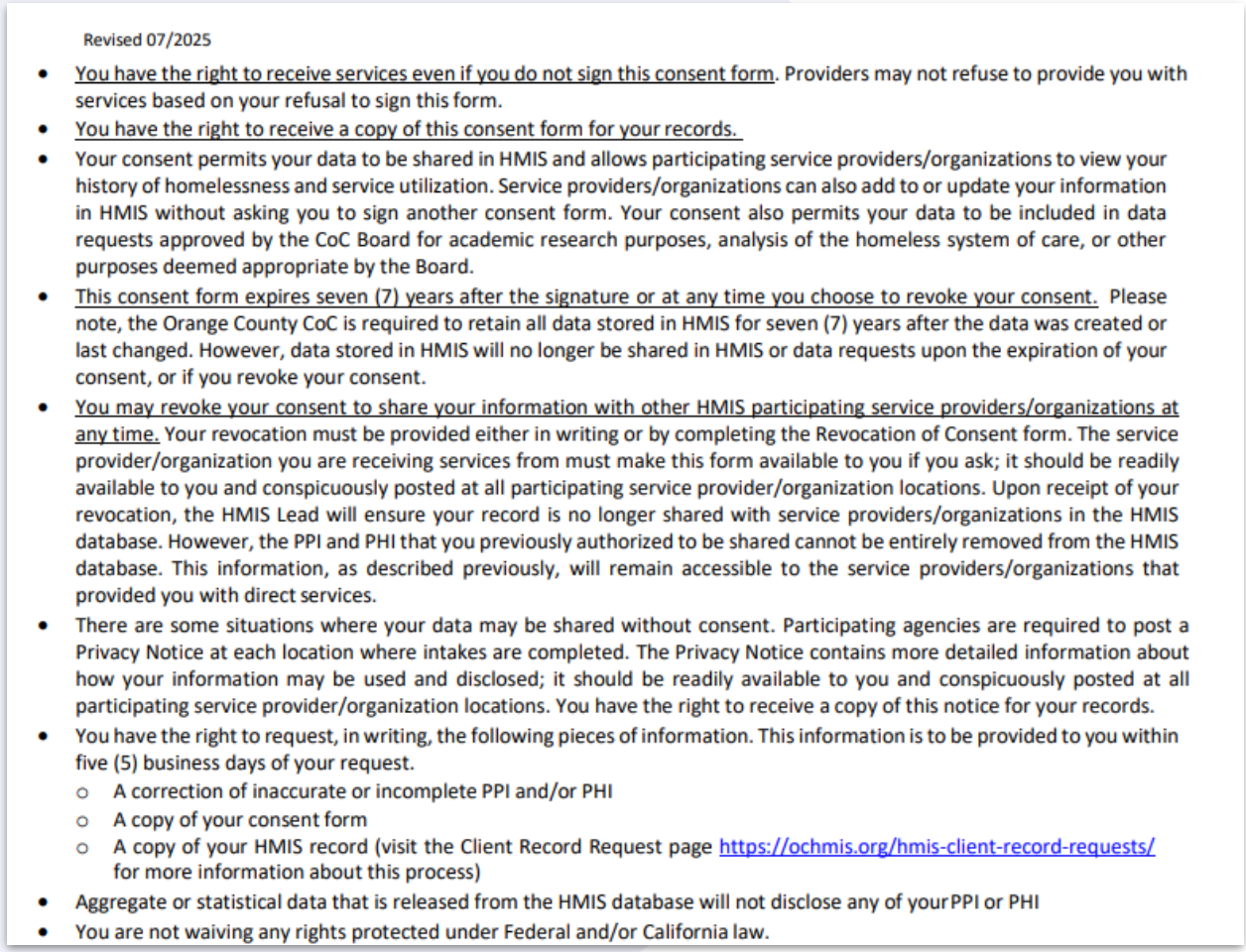
Client Consent to Share PPI

Please remind clients that they have the right to request, in writing, the following pieces of information:

- A correction of inaccurate or incomplete PPI
- A copy of their consent form
- A copy of their HMIS record

This information is to be provided within five (5) business days of the client's request.



Revised 07/2025

- You have the right to receive services even if you do not sign this consent form. Providers may not refuse to provide you with services based on your refusal to sign this form.
- You have the right to receive a copy of this consent form for your records.
- Your consent permits your data to be shared in HMIS and allows participating service providers/organizations to view your history of homelessness and service utilization. Service providers/organizations can also add to or update your information in HMIS without asking you to sign another consent form. Your consent also permits your data to be included in data requests approved by the CoC Board for academic research purposes, analysis of the homeless system of care, or other purposes deemed appropriate by the Board.
- This consent form expires seven (7) years after the signature or at any time you choose to revoke your consent. Please note, the Orange County CoC is required to retain all data stored in HMIS for seven (7) years after the data was created or last changed. However, data stored in HMIS will no longer be shared in HMIS or data requests upon the expiration of your consent, or if you revoke your consent.
- You may revoke your consent to share your information with other HMIS participating service providers/organizations at any time. Your revocation must be provided either in writing or by completing the Revocation of Consent form. The service provider/organization you are receiving services from must make this form available to you if you ask; it should be readily available to you and conspicuously posted at all participating service provider/organization locations. Upon receipt of your revocation, the HMIS Lead will ensure your record is no longer shared with service providers/organizations in the HMIS database. However, the PPI and PHI that you previously authorized to be shared cannot be entirely removed from the HMIS database. This information, as described previously, will remain accessible to the service providers/organizations that provided you with direct services.
- There are some situations where your data may be shared without consent. Participating agencies are required to post a Privacy Notice at each location where intakes are completed. The Privacy Notice contains more detailed information about how your information may be used and disclosed; it should be readily available to you and conspicuously posted at all participating service provider/organization locations. You have the right to receive a copy of this notice for your records.
- You have the right to request, in writing, the following pieces of information. This information is to be provided to you within five (5) business days of your request.
  - A correction of inaccurate or incomplete PPI and/or PHI
  - A copy of your consent form
  - A copy of your HMIS record (visit the Client Record Request page https://ochmis.org/hmis-client-record-requests/ for more information about this process)
- Aggregate or statistical data that is released from the HMIS database will not disclose any of your PPI or PHI
- You are not waiving any rights protected under Federal and/or California law.

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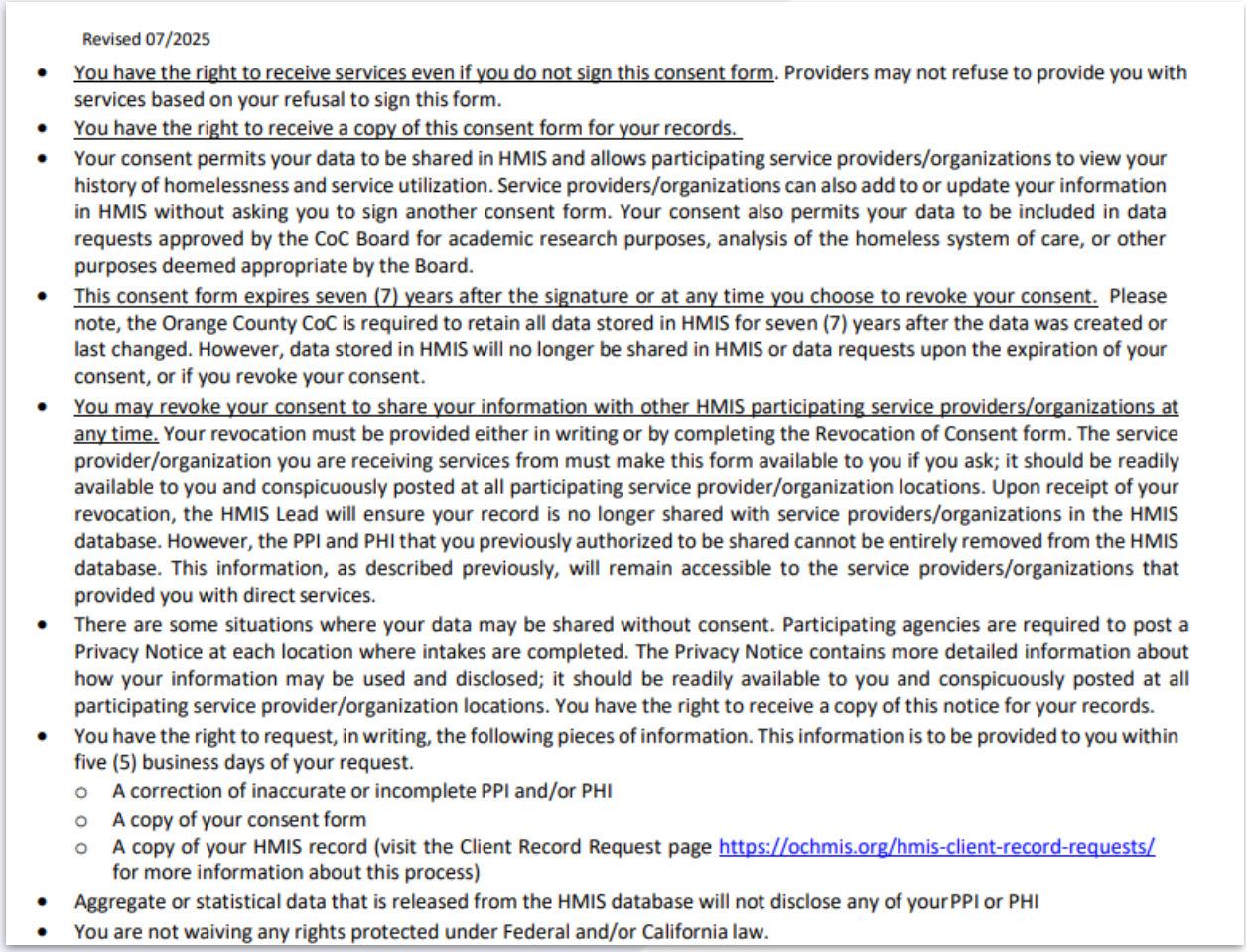
Client Consent to Share PPI

The client consent form expires seven (7) years after their signature or at any time clients choose to revoke consent.

The Orange County CoC is required to retain all data stored in HMIS for seven (7) years after the data was created or last changed.

However, data stored in HMIS will no longer be *shared* in HMIS upon the expiration of the client's consent, or revocation of consent.



Revised 07/2025

- You have the right to receive services even if you do not sign this consent form. Providers may not refuse to provide you with services based on your refusal to sign this form.
- You have the right to receive a copy of this consent form for your records.
- Your consent permits your data to be shared in HMIS and allows participating service providers/organizations to view your history of homelessness and service utilization. Service providers/organizations can also add to or update your information in HMIS without asking you to sign another consent form. Your consent also permits your data to be included in data requests approved by the CoC Board for academic research purposes, analysis of the homeless system of care, or other purposes deemed appropriate by the Board.
- This consent form expires seven (7) years after the signature or at any time you choose to revoke your consent. Please note, the Orange County CoC is required to retain all data stored in HMIS for seven (7) years after the data was created or last changed. However, data stored in HMIS will no longer be shared in HMIS or data requests upon the expiration of your consent, or if you revoke your consent.
- You may revoke your consent to share your information with other HMIS participating service providers/organizations at any time. Your revocation must be provided either in writing or by completing the Revocation of Consent form. The service provider/organization you are receiving services from must make this form available to you if you ask; it should be readily available to you and conspicuously posted at all participating service provider/organization locations. Upon receipt of your revocation, the HMIS Lead will ensure your record is no longer shared with service providers/organizations in the HMIS database. However, the PPI and PHI that you previously authorized to be shared cannot be entirely removed from the HMIS database. This information, as described previously, will remain accessible to the service providers/organizations that provided you with direct services.
- There are some situations where your data may be shared without consent. Participating agencies are required to post a Privacy Notice at each location where intakes are completed. The Privacy Notice contains more detailed information about how your information may be used and disclosed; it should be readily available to you and conspicuously posted at all participating service provider/organization locations. You have the right to receive a copy of this notice for your records.
- You have the right to request, in writing, the following pieces of information. This information is to be provided to you within five (5) business days of your request.
  - A correction of inaccurate or incomplete PPI and/or PHI
  - A copy of your consent form
  - A copy of your HMIS record (visit the Client Record Request page https://ochmis.org/hmis-client-record-requests/ for more information about this process)
- Aggregate or statistical data that is released from the HMIS database will not disclose any of your PPI or PHI
- You are not waiving any rights protected under Federal and/or California law.

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Client Consent to Share PPI

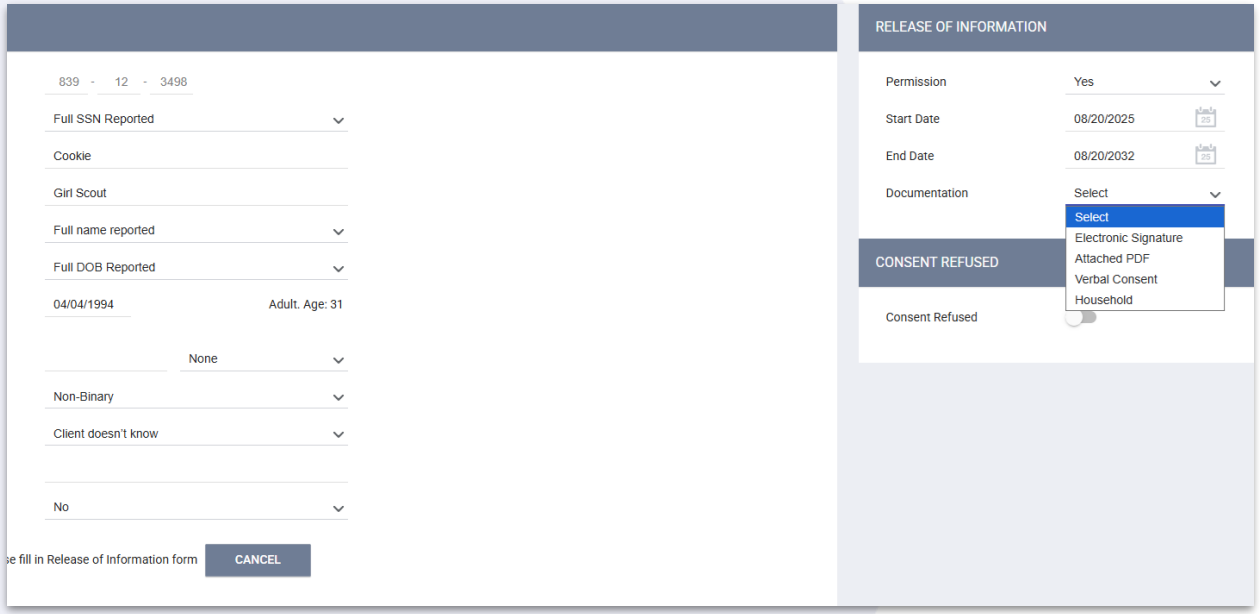
Once client consent has been collected it must be added to their record.

1. If the client does not have an existing record, create a new client record.

1. On the record creation screen, find the Release of Information field and set the permission status to 'YES.'
2. The ROI date auto populates to the current date; adjust to date of collection. Note the end date auto populates to (7) years.

1. Select the method used to collect client consent from the Documentation field.

Record Creation Screen



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Client Consent to Share PPI

ROI Collection Options:

- Electronic - (For HoH or adults): Prompts a signature field to appear; client signatures are recorded directly in HMIS via mouse or signature pad. The ROI should also note any minor children included.
- Attached PDF - (For HoH or adults) Upload a signed ROI PDF attachment; the ROI should also note any minor children included.
- Verbal - (For HoH or adults) - Placeholder - Only select when not immediately able to collect written or electronic consent.
  - Users must collect wet or electronically signed ROIs at the next in-person meeting.
- Household: Use this option for minor children included on a HoH's consent.

Both the written and electronically signed consents expire after seven years.

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Client Consent to Share PPI

ROI Collection Methods for Unaccompanied Minors:

- Unaccompanied minors (a single client age 17 or under, or a household where all clients are 17 or under) CANNOT consent to share their personal information in HMIS.

- Clients served through RHY/HHS require parental/guardian consent to share their data in HMIS.
  - If the client can show proof of emancipation, they CAN complete the consent without a parent or legal guardian.

- Without consent to share PPI, the minor's HMIS permission should be set to **No**, and Client Privacy must be set to "**Private**".

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Client Consent to Share PPI

Common ROI errors:

- If the client record already has an active ROI, you do not need to add another if their consent status has not changed.
    - However, agencies should still review the Privacy and Consent Forms as standard practice during intake.
    - If an agency would still like to add their own signed ROI to the client record, they can add it under the client files section of the record.
- Dating the ROI - Enter the date the ROI was signed, either a past or current date, but never enter a future date.

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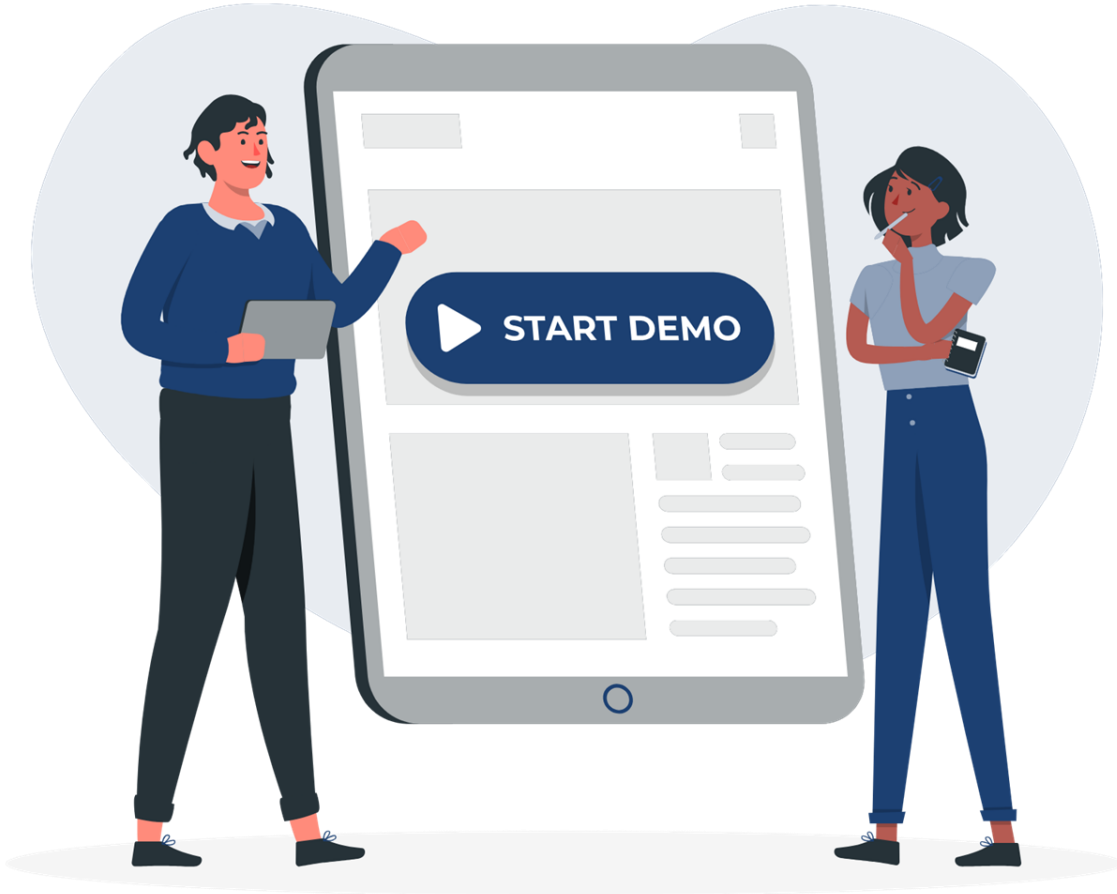
Adding ROI Demo



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Client Record Privacy and Sharing Settings

Graphic by: https://storyset.com/online

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Client Record Privacy and Sharing Settings

Client Privacy and Record Sharing Overview:

Consent: Clients who sign the consent can have a public record viewable by HMIS participating agencies.

Refuse: Before, or the time of record creation, the client expresses that they do not want to their record to be shared, and the agency must make the record private so that no PPI is visible beyond their agency.

Revoke: Clients may also later revoke their consent, meaning they no longer want to their PPI to be shared with other agencies moving forward and the current agency must privatize or anonymize the record.

Further guidance about sharing settings is available from the Accessing and Completing Release of Information and Refusing/Revoking Consent to Share Personal Information Knowledge Base Articles.

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Client Record Privacy and Sharing Settings

If...	Then...
The client refuses consent during intake/record creation	• During record creation, the ROI status will be marked NO, and the record set to Private. • Only the agency that created the record will be able to view the record.
The client revokes their consent after record creation	• Add the Revocation of Consent to the file; • Add a new ROI, selecting NO. • Set the record to Private.
If the client revokes their consent after record creation **AND** more than one agency has data in the record	• Add the Revocation of Consent to the file; • Add a new ROI, selecting NO. • Agency Administrator submits a Helpdesk ticket to anonymize the profile.

If...	Then...
The client refuses to provide ANY PPI during record creation	• Set the ROI status to NO; • Toggle Consent Refused.

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Privatization at Record Creation

All client records will default to **public**, even when the ROI status is set to “no” during record creation.

If a client refuses their consent, then follow these steps to set the record to private.

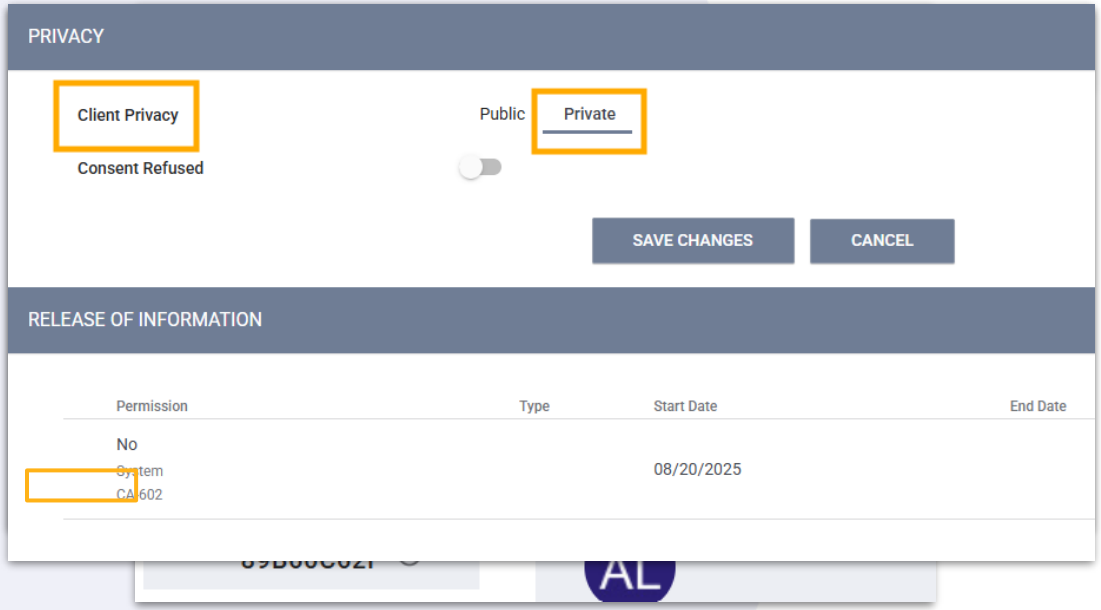
Step 1. Enter the PPI provided by the client.

Step 2. Under the ROI section, select NO.

Step 3. Select ADD RECORD.

Step 4. Navigate to the privacy setting by selecting the “shield icon.”

Step 5. Next to Client Privacy, select Private and save changes



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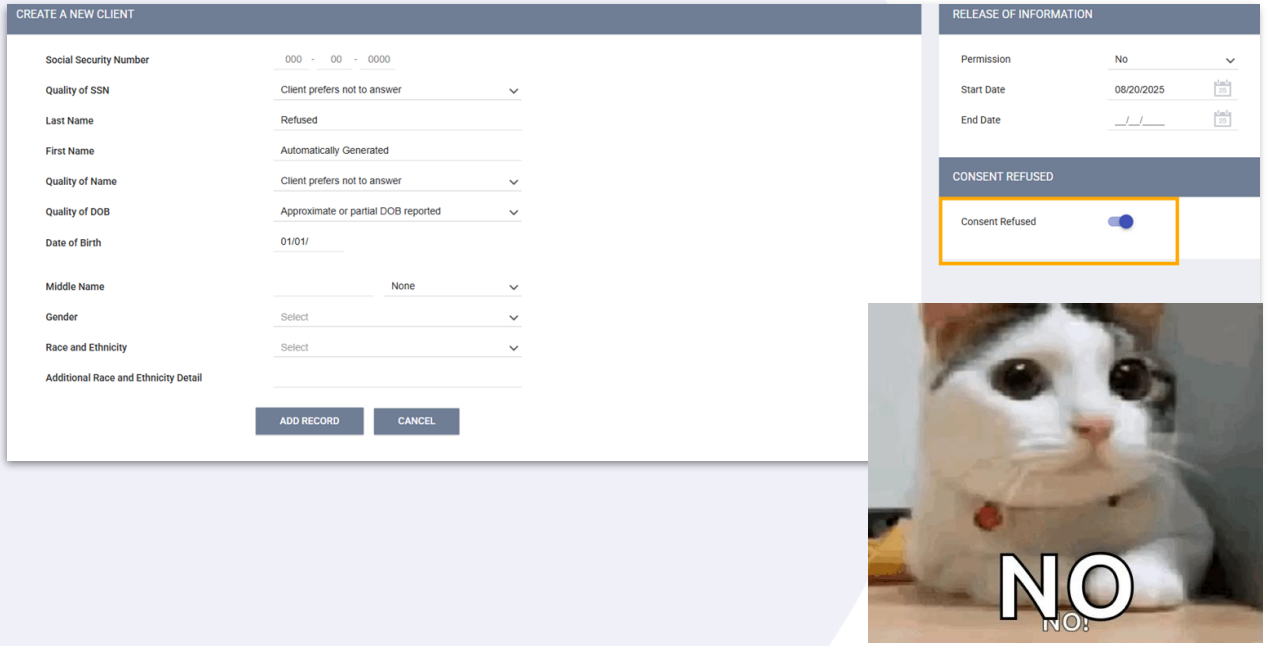
Privatization at Record Creation

Users will see the Consent Refused button available on the record creation screen.

This should only be pressed in cases where the client declines to provide any of their PPI.

- **Do not** press that button if the client provides some but not all their PPI.
- **Do not** press that button because client refuses to sign the consent.

For information about this, see the Creating Client Records without Identifying Information Knowledge Base Article.



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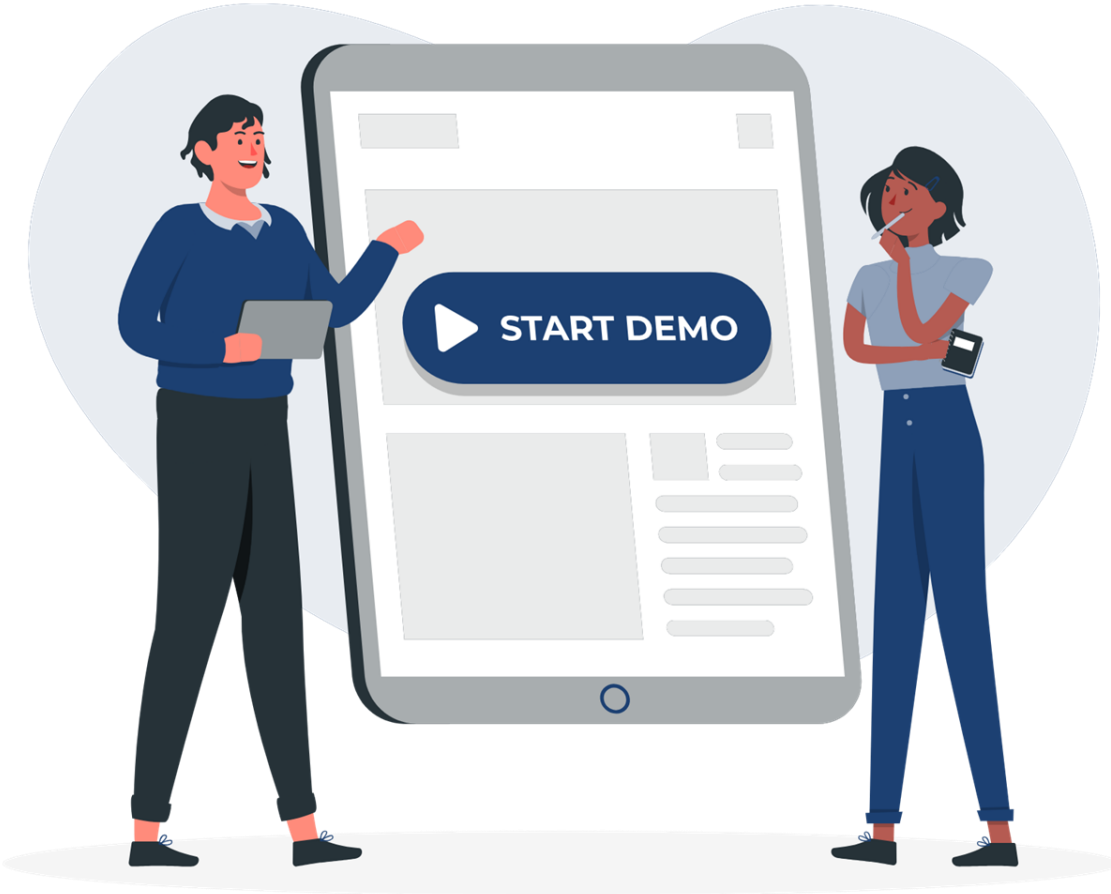
Record Privatization Demo



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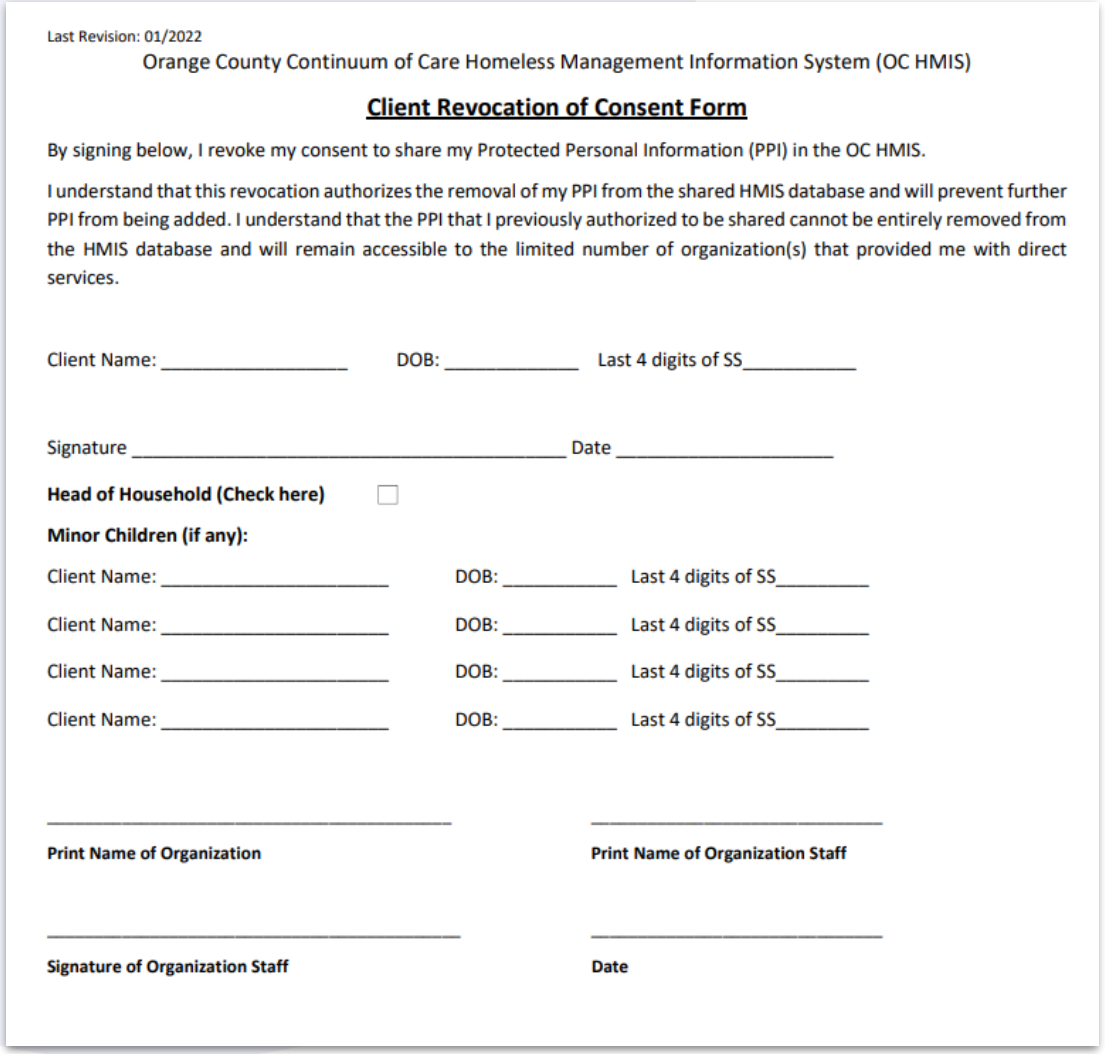
Revocation of Consent

If a client no longer desires to share their PPI moving forward, this is called revoking consent.

The client will sign the Revocation of Consent and the HMIS user will upload to form to the client record under the files tab.

To find the Revocation of Consent Form navigate to:

ochmis.org> HMIS Forms and Documents > HMIS Policy and Privacy Forms > Client Revocation of Consent Form.



Last Revision: 01/2022

Orange County Continuum of Care Homeless Management Information System (OC HMIS)

Client Revocation of Consent Form

By signing below, I revoke my consent to share my Protected Personal Information (PPI) in the OC HMIS.

I understand that this revocation authorizes the removal of my PPI from the shared HMIS database and will prevent further PPI from being added. I understand that the PPI that I 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 me with direct services.

Client Name: _____ DOB: _____ Last 4 digits of SS_____

Signature _____ Date _____

Head of Household (Check here) ☐

Minor Children (if any):

Client Name: _____ DOB: _____ Last 4 digits of SS_____

Client Name: _____ DOB: _____ Last 4 digits of SS_____

Client Name: _____ DOB: _____ Last 4 digits of SS_____

Client Name: _____ DOB: _____ Last 4 digits of SS_____

_____ _____

Print Name of Organization **Print Name of Organization Staff**

_____ _____

Signature of Organization Staff **Date**

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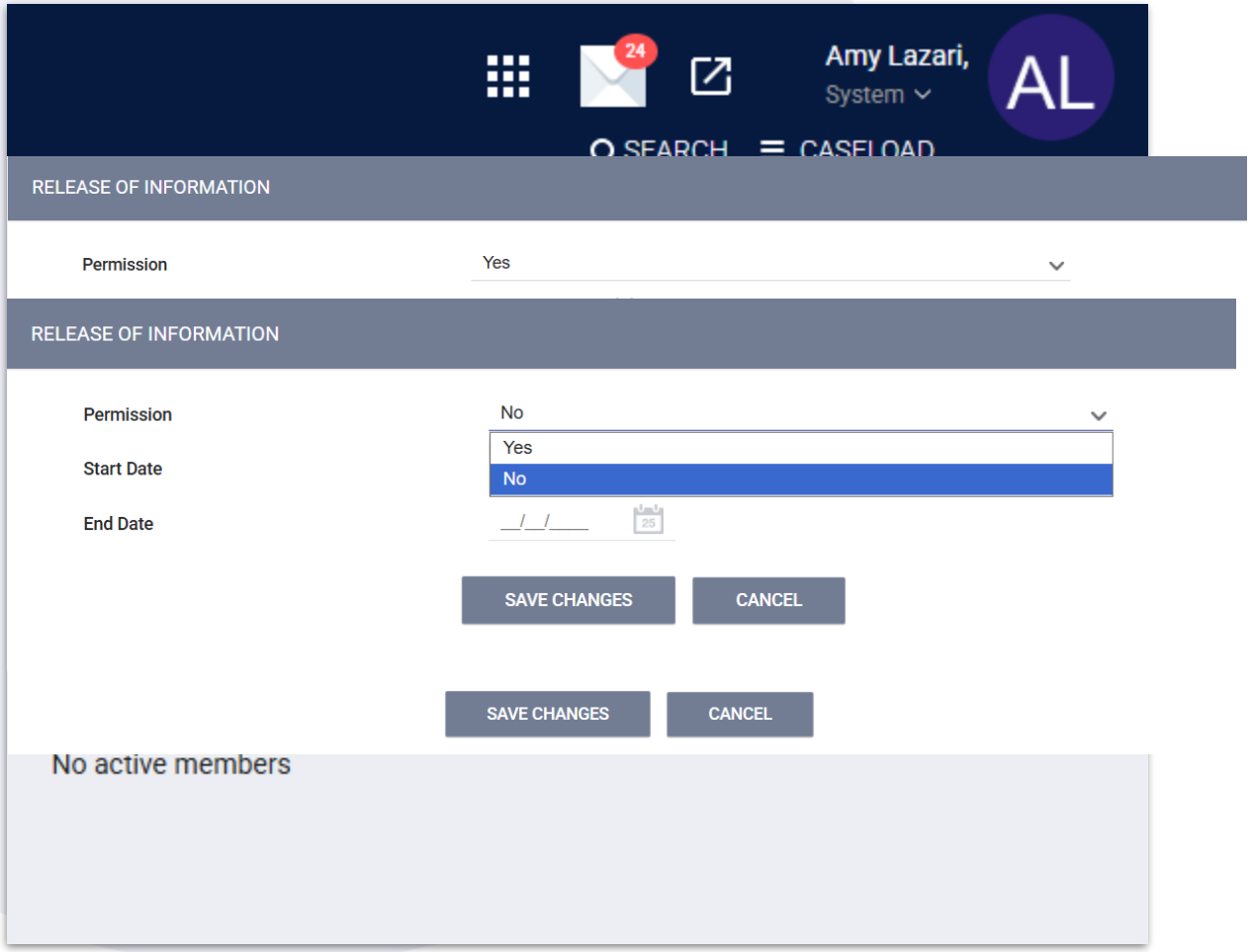
Revocation of Consent

Once the signed Revocation of Consent has been added to the record, users will then need to adjust the ROI status AND make the record private.

1. Update the sharing settings by clicking on the Privacy button (shield icon).
2. Under PRIVACY, edit the prior ROI end date to the day before the start date of the new ROI.
3. Press Add Release of Information.
4. Set Permission to No and save.



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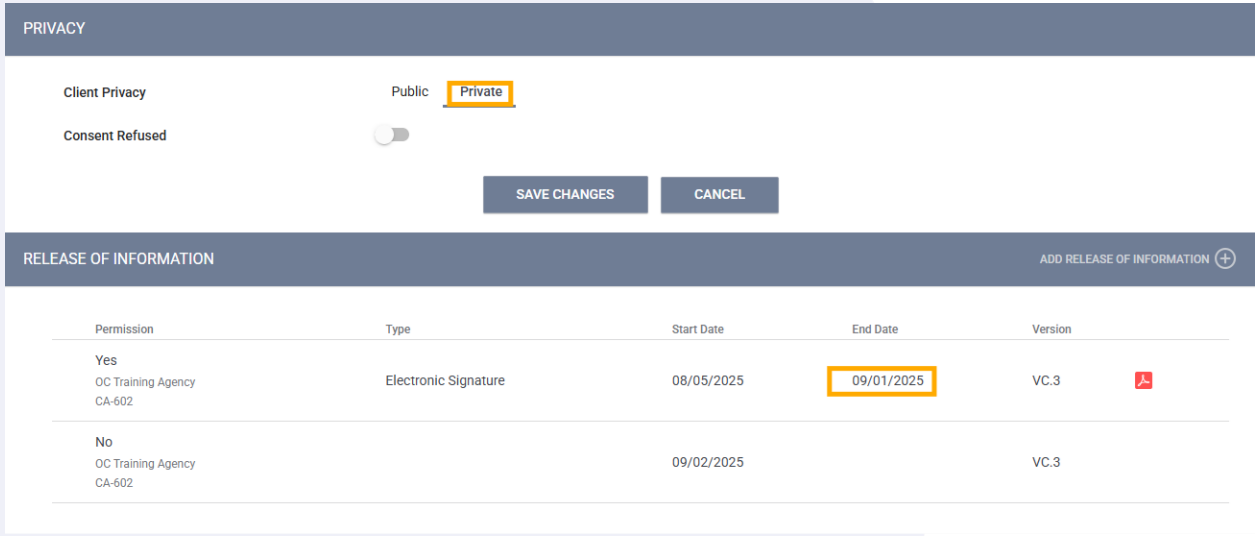
Revocation of Consent

Adjusting Privacy Settings

Next set the record to private.

- Find Client Privacy and select **Private**.
- Do not toggle Consent Refused!



The record is now private - meaning the profile is no longer shared with other HMIS agencies.

The agency that created the record can still search up the record, and enter and view their data.

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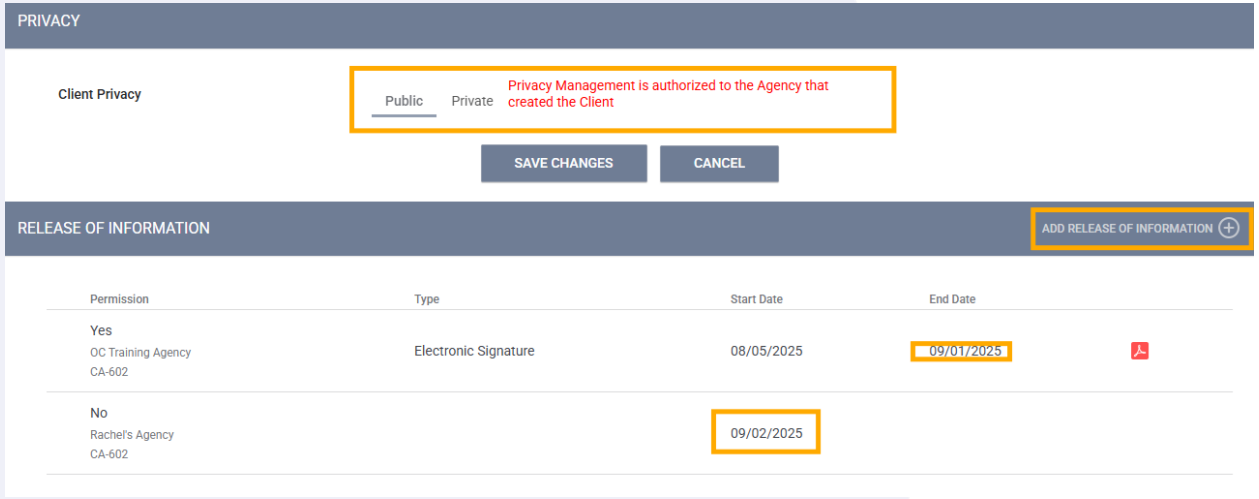
Revocation of Consent

If *more than one* agency has entered data in the record, then the record cannot be made private.

1. Add the signed Revocation of Consent to the client files.
2. Then update the ROI section to No, by selecting Add Release of Information.
3. The agency's HMIS Administrator must contact the HMIS Help Desk to request a **profile anonymization.**

The Help Desk will contact all agencies with data within the record, and notify them that PPI has been removed from the profile screen.



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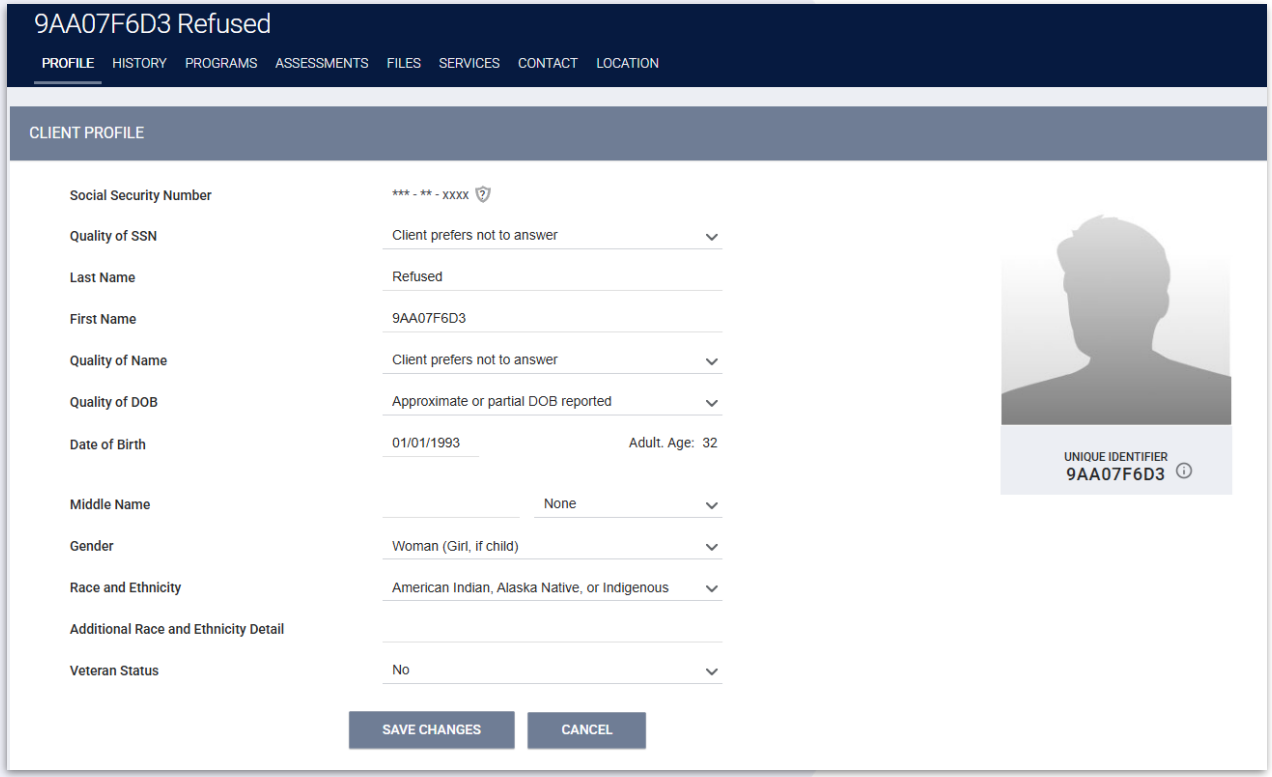
Revocation of Consent

Here is a before and after of an anonymized record.

Anonymization does not make the record truly "Private," but removes PPI from the profile screen.

- They will only be searchable by their UID. Other existing PPI will remain (e.g. files).
- Any other agencies encountering the client in the future will need to create their own private record for the client.

Anonymization is also required for clients who do not consent to share their PPI and desire access to the Coordinated Entry System (CES).



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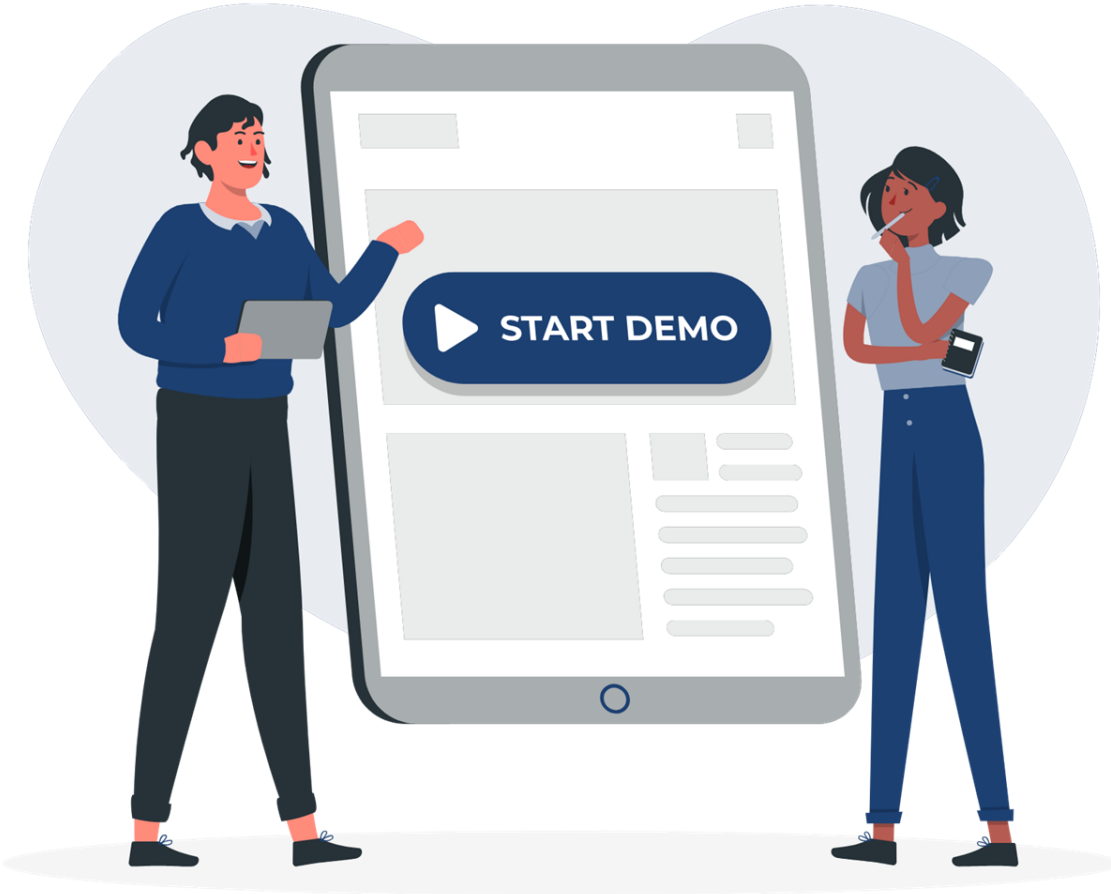
Record Anonymization Demo



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Client Record Requests

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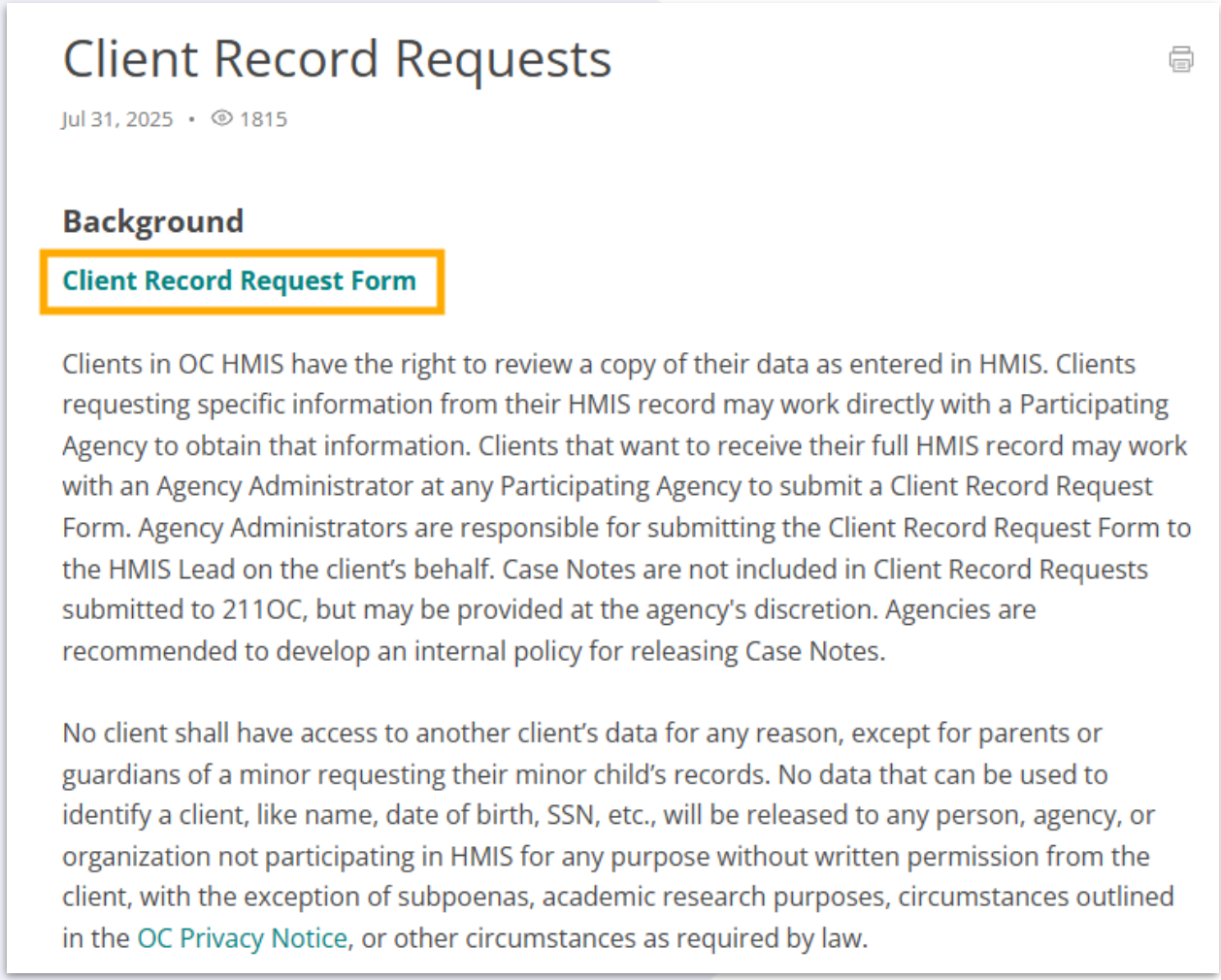
Client Record Request

Clients have the right to inspect and obtain a copy of their HMIS record.

Clients may submit the request to any agency currently participating in OC HMIS.

Agency Administrators are responsible for submitting the Client Record Request Form within five (5) business days of a request.



Client Record Requests

Jul 31, 2025 • 1815

Background

Client Record Request Form

Clients in OC HMIS have the right to review a copy of their data as entered in HMIS. Clients requesting specific information from their HMIS record may work directly with a Participating Agency to obtain that information. Clients that want to receive their full HMIS record may work with an Agency Administrator at any Participating Agency to submit a Client Record Request Form. Agency Administrators are responsible for submitting the Client Record Request Form to the HMIS Lead on the client's behalf. Case Notes are not included in Client Record Requests submitted to 211OC, but may be provided at the agency's discretion. Agencies are recommended to develop an internal policy for releasing Case Notes.

No client shall have access to another client's data for any reason, except for parents or guardians of a minor requesting their minor child's records. No data that can be used to identify a client, like name, date of birth, SSN, etc., will be released to any person, agency, or organization not participating in HMIS for any purpose without written permission from the client, with the exception of subpoenas, academic research purposes, circumstances outlined in the OC Privacy Notice, or other circumstances as required by law.

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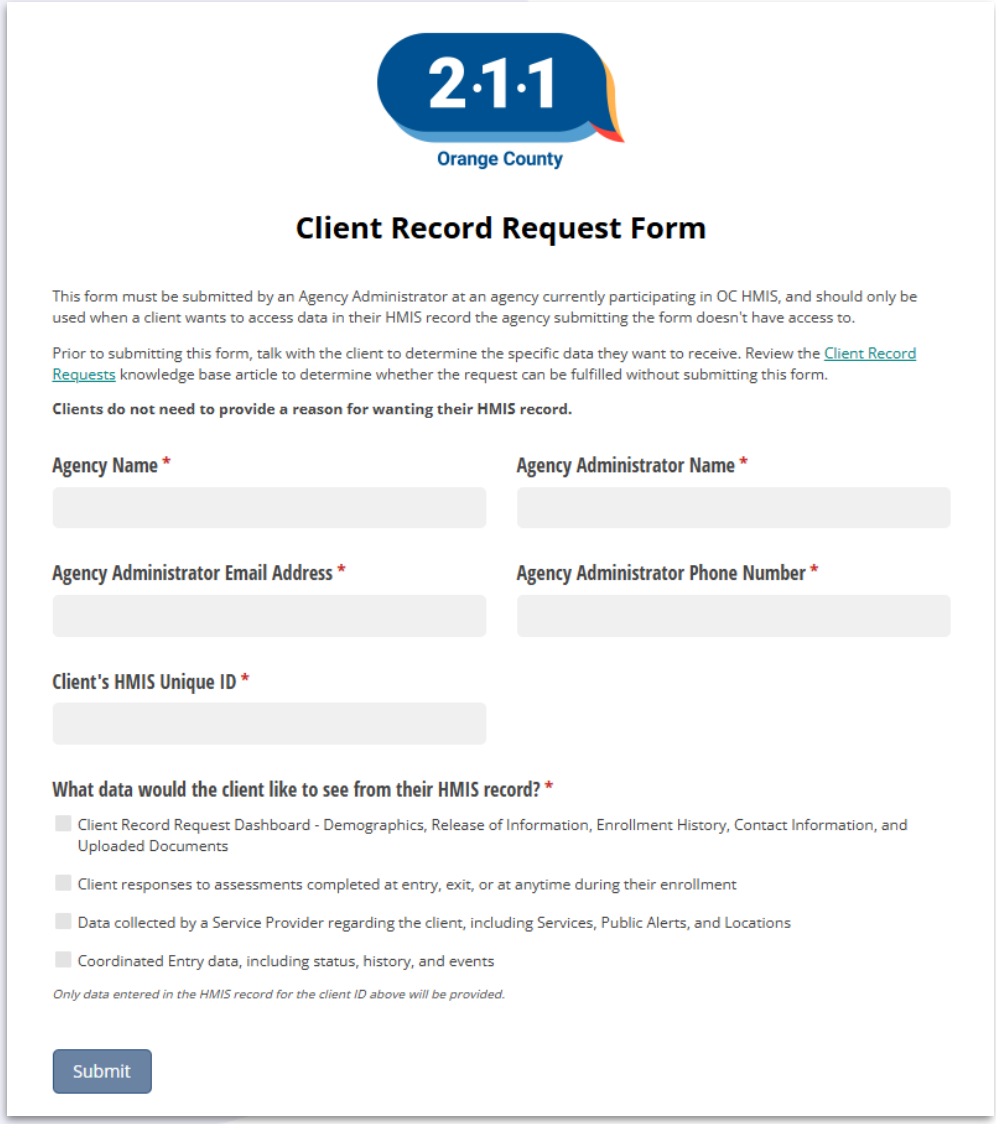
Client Record Request

OC HMIS recently updated the Client Record Request processes.

Agencies may now use the Client Record Request Form in lieu of a ticket submission.

The HMIS Help Desk will upload the client's files to the agency HMIS Dropbox folder.

Users should review the Client Records Request Knowledge Base Article for guidance about the updated procedure.



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Client Record Request Form

This form must be submitted by an Agency Administrator at an agency currently participating in OC HMIS, and should only be used when a client wants to access data in their HMIS record the agency submitting the form doesn't have access to.

Prior to submitting this form, talk with the client to determine the specific data they want to receive. Review the Client Record Requests knowledge base article to determine whether the request can be fulfilled without submitting this form.

Clients do not need to provide a reason for wanting their HMIS record.

Agency Name *

Agency Administrator Name *

Agency Administrator Email Address *

Agency Administrator Phone Number *

Client's HMIS Unique ID *

What data would the client like to see from their HMIS record? *

- Client Record Request Dashboard - Demographics, Release of Information, Enrollment History, Contact Information, and Uploaded Documents
- Client responses to assessments completed at entry, exit, or at anytime during their enrollment
- Data collected by a Service Provider regarding the client, including Services, Public Alerts, and Locations
- Coordinated Entry data, including status, history, and events

Only data entered in the HMIS record for the client ID above will be provided.

Submit

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Client Record Request

At the time of the request, the Agency Administrator must verify the client's identity and communicate with the client to review the record request process.

- Review the Client Record Request Knowledge Base Article.
- Explain what information can be requested and what each file will contain.
- If the client wants a revision to their data, explain which elements of the record can or cannot be revised.

Client Record Request Review Procedures

- If the Client Record Request review occurs in person with the client, the following practices should be followed:
  - The Agency Administrator should meet with the client in a private location where the client's information cannot be overheard by other clients or members of the public.
  - The Agency Administrator should explain each file and what information is collected. This information is included on the Client Record Request Form that is sent to the Agency Administrator, and is also available in the Client Record Request Form Documentation.
  - If the client requests a revision to their data, review the Client Data Revisions section below to determine if this data can be edited.
  - If a copy of the files are printed for the client's review, the Agency Administrator must shred the files on the client's behalf once the client reviews the files and discusses any data with the Agency Administrator. The only exception to this is if the client wants to take the files with them. This is not recommended, as the files contain sensitive client information.
- If the files are sent over encrypted email, the email should include all files sent from 211OC, including a copy of the Client Record Request Form sent by 211OC, which contains an overview of the files and tips for protecting the client's information. The agency should also inform the client that if they need a revision to their data they will need to work directly with an agency that they have been served by.

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Client Record Request

Record Request Process

At the time of the request, the Agency Administrator must decide with the client, an appropriate method to share the client information.

The method should not violate the privacy of the client's data.

- Schedule a time for the client to pick up the record in office or deliver the record to the client in-person.
- Records can be emailed if they are encrypted or the file is password protected ***and*** the client has the knowledge to access the documents.
- Avoid snail mail as it is not as protected as other methods.

Client Record Request Process

- Clients can request their record from any agency currently participating in OC HMIS. The agency is responsible for verifying the client's identity prior to sharing any data. Review the Verifying a Client's Identity section below for more details on how to do this. Clients should not contact 211OC directly unless they have requested their record from an agency and were denied. In this case, clients should submit a grievance to 211OC.
- An Agency Administrator at the agency must have a conversation with the client to understand what data they are requesting. If the Agency Administrator has access to the data being requested and is able to provide the information to the client, they can do so without submitting the Client Record Request Form. Review the Common Client Record Requests section below for instructions on how to find the information being requested in HMIS. If the Agency Administrator doesn't have access or otherwise cannot provide the information being requested by the client, they must complete the Client Record Request Form on the client's behalf. If the Agency Administrator cannot find the client's record in HMIS, it's possible that the client's record has been marked private and is not visible by other agencies. In this case, the Agency Administrator must call 211OC and provide the client's name, and the HMIS Help Desk team will search for the client's record.
- At the time of the client's request, the Agency Administrator must decide with the client an appropriate method for the client to receive their information that does not violate the privacy of the client's data. Acceptable methods of sharing the requested data with the client include:
  - Scheduling a time for the client to return to the office to pick-up their files in person
  - Emailing the client's files to the client or another trusted contact like a case manager, advocate, friend, etc. that the client has approved to receive their data. This method is only acceptable if the files are password protected, or otherwise sent over encrypted email, and if the recipient of the email understands how to access documents that have been sent over encrypted email.

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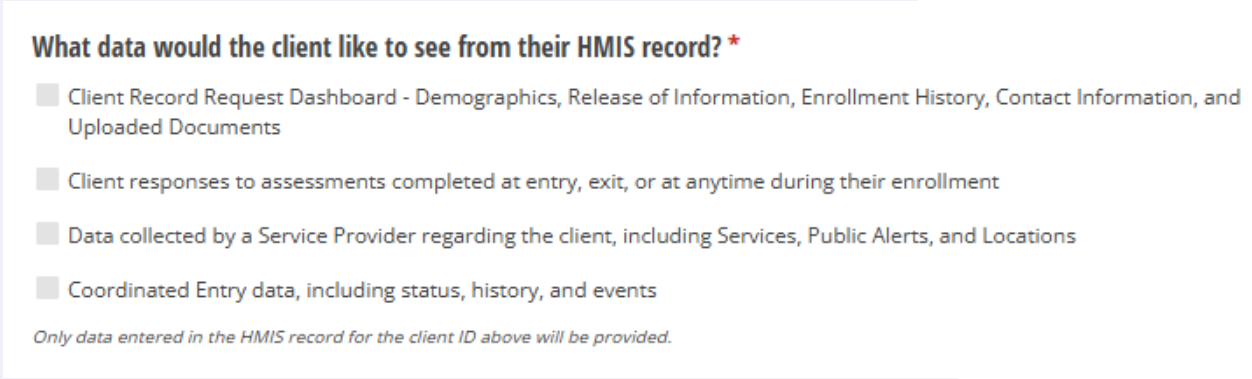
Client Record Request

Requests to Revise Client Data

Clients may request revisions/updates to data that they contributed to HMIS.

- Client Profile and Contact Information
- Client assessment responses
- Request to add documents
- Revoke their consent to share their PPI



Enrollment history, services, and CES status can been shared but not revised at the client's request.

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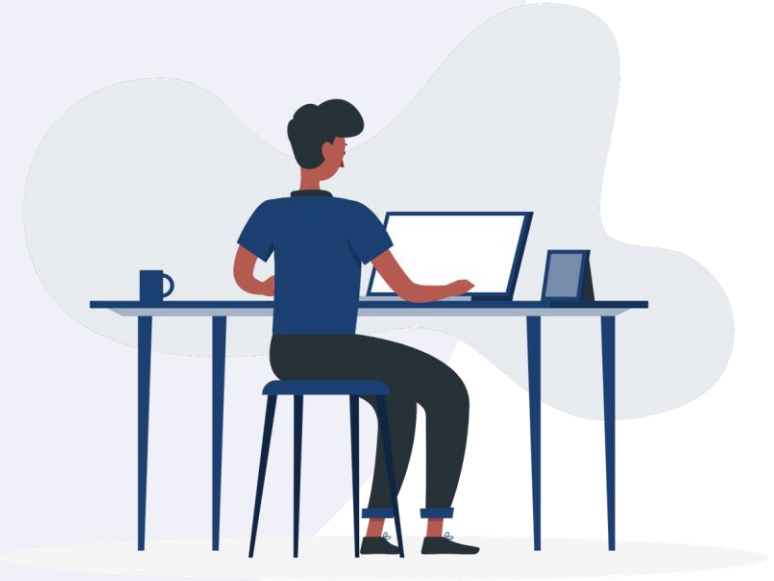
Client Record Request

Requests for Client Case Notes

Case Notes may be shared at the discretion of the agency.

The Agency Administrator can run the Client Record Requests saved Look:

Launch pad > Reports > Data Analysis > Client Record Request > Client Record Request: Case Notes.



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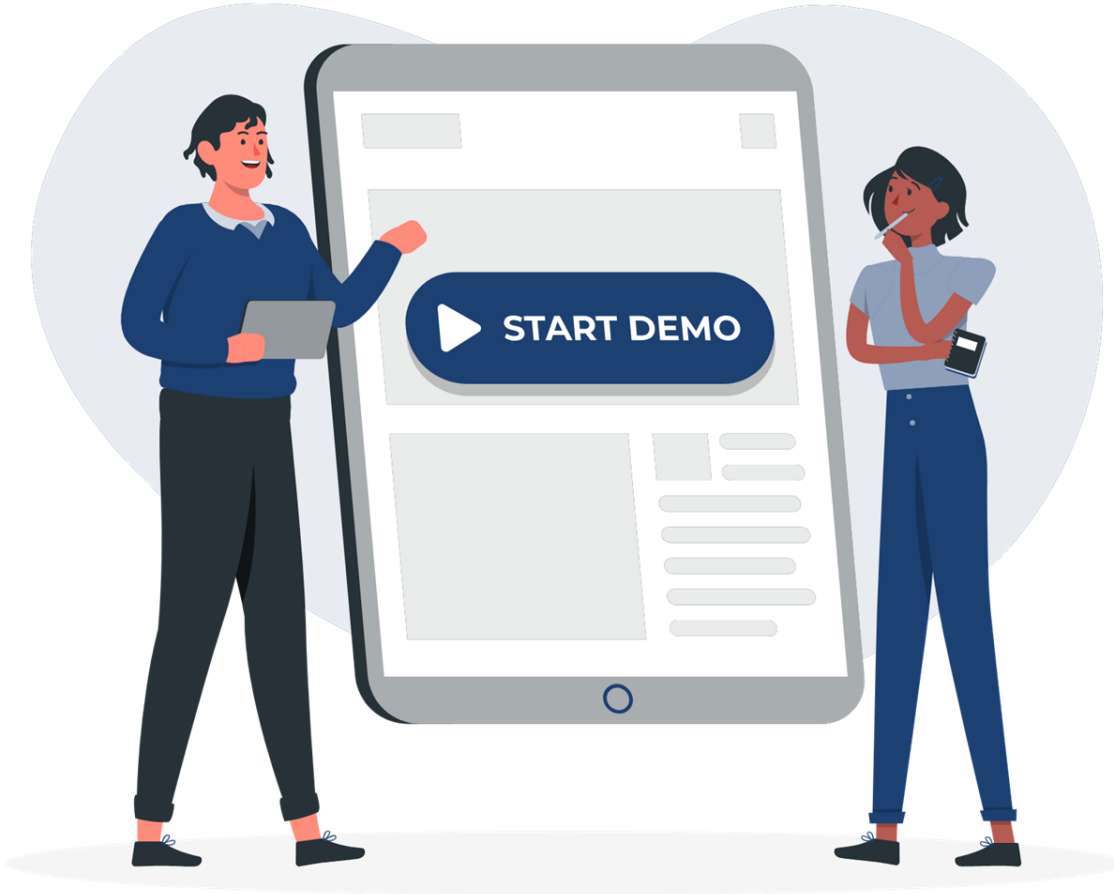
Client Case Notes Demo



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HMIS Grievance Process

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HMIS Grievance Process

Clients should complete the HMIS Grievance Form if they feel their privacy and security regarding data stored in HMIS was violated, or if their HMIS rights were violated.

What violations are considered HMIS grievances?

Examples of violations could include:

- The client's HMIS record being shared with someone who is not authorized to access their record
- Client being denied access to review their client record as outlined in the HMIS Policies and Procedures.

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HMIS Grievance Process

- If possible, the client and agency should attempt to resolve the grievance first
- Grievances may be submitted to the OC HMIS team by either of the following methods:
  - Call the HMIS team at (714) 589-2360 OR
  - Send the Grievance form to:

    Orange County United Way

    Attn: HMIS Department

    18012 Mitchell South Irvine, CA 92614

For grievances related to care provided through the Coordinated Entry System, contact the Office of Care Coordination at coordinatedEntry@ceo.oc.gov.

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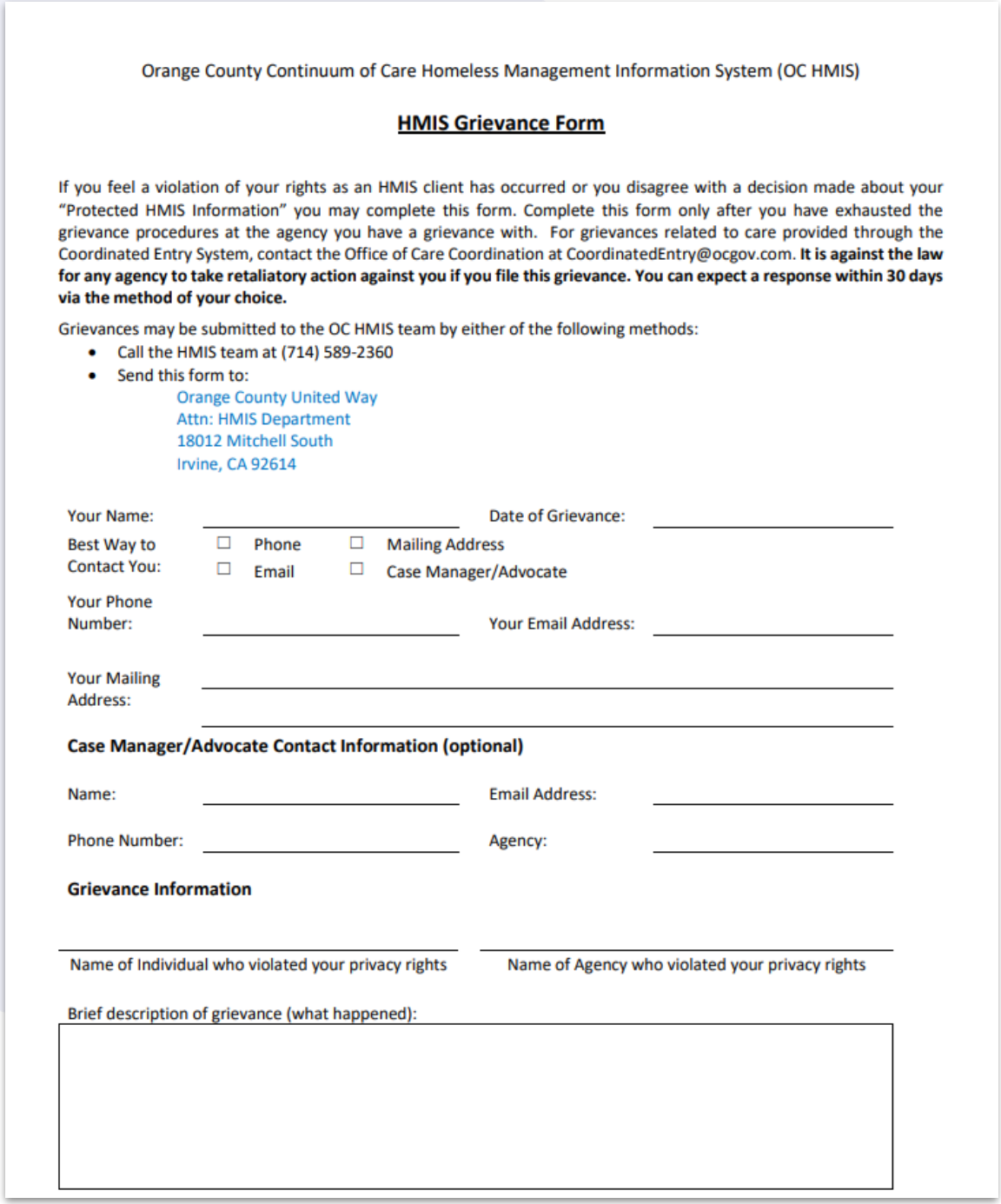
The HMIS Grievance Form can be located on the OC HMIS website.

ochmis.org > HMIS Forms and Documents > HMIS Policy and Privacy Forms > HMIS Grievance Form.

- Agencies should ensure this form is available to clients upon intake and share examples of what is considered a grievance related to HMIS data versus services/care.
- Must be completed by the client and include as much detail as possible.
- OCHMIS may contact agencies for resolution steps that require action on the part of the agency



Orange County Continuum of Care Homeless Management Information System (OC HMIS)

HMIS Grievance Form

If you feel a violation of your rights as an HMIS client has occurred or you disagree with a decision made about your "Protected HMIS Information" you may complete this form. Complete this form only after you have exhausted the grievance procedures at the agency you have a grievance with. For grievances related to care provided through the Coordinated Entry System, contact the Office of Care Coordination at CoordinatedEntry@ocgov.com. **It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.**

Grievances may be submitted to the OC HMIS team by either of the following methods:

- Call the HMIS team at (714) 589-2360
- Send this form to:

  Orange County United Way
  Attn: HMIS Department
  18012 Mitchell South
  Irvine, CA 92614

Your Name: _____ Date of Grievance: _____

Best Way to Contact You: ☐ Phone ☐ Mailing Address ☐ Email ☐ Case Manager/Advocate

Your Phone Number: _____ Your Email Address: _____

Your Mailing Address: _____

Case Manager/Advocate Contact Information (optional)

Name: _____ Email Address: _____

Phone Number: _____ Agency: _____

Grievance Information

_____ _____

Name of Individual who violated your privacy rights | Name of Agency who violated your privacy rights

Brief description of grievance (what happened):

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HMIS Meeting Survey

Our HMIS Helpdesk Team invites users to complete the Client Privacy and Data Ethics Training Survey.

Please let us know what aspects of the training we could add to, or clarify..

Survey: https://forms.gle/5y7gvwvMjJeDADy68

Graphic by: https://storyset.com/online

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Q&A

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