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HOMELESS CONTINUUM OF CARE OF STARK COUNTY SYSTEM PRIVACY NOTICE

_____ is a Participating Agency in the Stark County Homeless Management Information System (HMIS) and the Coordinated Entry System (CES) hereinafter referred to as “the System”. The System is a shared homeless and housing database administered by the Homeless Continuum of Care of Stark County (HCCSC) and the **current** Participating Agencies listed in Attachment A of policy E.3 Participant Informed Consent and Release of Information Authorization.

The Stark County System seeks to improve services and programs for homeless and low-income households by allowing authorized staff at Participating Agencies to share participant information and to follow trends and service patterns over time. The Stark County System implements numerous privacy and security measures to ensure the confidentiality of your personal information.

Participation in the Stark County System is important to our community’s ability to provide you with the best services and housing possible and to better understand the local needs. As you receive services, information will be collected about you, the services provided to you, and the outcomes these services help you to achieve. Authorizing your information to be entered into the System and shared with Participating Agencies is voluntary. Refusing to do so will not limit your access to shelter or services.

A. **About this Notice**

1. This Notice describes the collection, use, disclosure and maintenance of Protected Personal Information for Participants of the Stark County System whose information has been recorded in the Stark County System. It also describes the rights Participants have regarding that information.
2. Protected Personal Information (“PPI”) is any personal information (PI) maintained about a Participant that:
 - i. allows identification of an individual directly or indirectly;
 - ii. can be manipulated by a reasonably foreseeable method to identify a specific individual; **or**
 - iii. can be linked with other available information to identify a specific Participant.
3. This Notice may be amended and policies or practices changed at any time. Amendments may affect PI obtained before the effective date of the amendment.

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4. A written copy of this Notice will be provided to any individual who asks.

B. Purposes and Procedure for Collecting Personal Information

1. Only lawful and fair means will be used to collect PI.
2. PI may be collected for any one or combination of these purposes:
 - a. to provide or coordinate services to Participants
 - b. to locate other programs that may be able to assist Participants
 - c. for functions related to payment or reimbursement from others for services provided
 - d. to operate the System, including administrative functions such as legal, audits, personnel, oversight, and management functions
 - e. for another specific purpose of the System and/or a Participating Agency that is consistent with the intent and purpose of the HMIS policies
 - f. to comply with government reporting obligations
 - g. when required by law
3. PI is normally collected with the knowledge or consent of the Participant. If a Participant seeks assistance and provides PI, it is assumed that the Participant consents to the collection of information as described in this notice.
4. Information about a Participant may also be obtained from:
 - a. Individuals who are with the Participant
 - b. Other social services organizations that the Participant has accessed
 - c. Government agencies
 - d. Public records

C. Use and Disclosure of Personal Information

1. Participants' PI may be used or disclosed by the System and/or Participating Agencies only for the purposes listed below:
 - a. to provide or coordinate services to individuals
 - b. for functions related to payment or reimbursement for services
 - c. to carry out administrative functions such as legal, audits, personnel, oversight, and management functions
 - d. to create de-identified (anonymous) information that can be used for research and statistical purposes
 - e. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law
 - f. to avert a serious threat to health or safety, under certain conditions
 - g. to report about an individual that the Participating Agency reasonably believes to

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be a victim of abuse, neglect or domestic violence under certain conditions

D. Purposes and Procedure for Collecting Personal Information

5. Only lawful and fair means will be used to collect PI.
6. PI may be collected for any one or combination of these purposes:
 - a. to provide or coordinate services to Participants
 - b. to locate other programs that may be able to assist Participants
 - c. for functions related to payment or reimbursement from others for services provided
 - d. to operate the System, including administrative functions such as legal, audits, personnel, oversight, and management functions
 - e. for another specific purpose of the System and/or a Participating Agency that is consistent with the intent and purpose of the HMIS policies
 - f. to comply with government reporting obligations
 - g. when required by law
7. PI is normally collected with the knowledge or consent of the Participant. If a Participant seeks assistance and provides PI, it is assumed that the Participant consents to the collection of information as described in this notice.
8. Information about a Participant may also be obtained from:
 - a. Individuals who are with the Participant
 - b. Other social services organizations that the Participant has accessed
 - c. Government agencies
 - d. Public records

E. Use and Disclosure of Personal Information

2. Participants' PI may be used or disclosed by the System and/or Participating Agencies only for the purposes listed below:
 - a. to provide or coordinate services to individuals
 - b. for functions related to payment or reimbursement for services
 - c. to carry out administrative functions such as legal, audits, personnel, oversight, and management functions
 - d. to create de-identified (anonymous) information that can be used for research and statistical purposes
 - e. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law
 - f. to avert a serious threat to health or safety, under certain conditions
 - g. to report about an individual that the Participating Agency reasonably believes to be a victim of abuse, neglect or domestic violence under certain conditions

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- h. for academic research purposes under certain conditions
 - i. to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under certain conditions
 - j. to comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.
3. All other uses and disclosures of a Participant's PI will only be made with the Participant's written authorization, which the Participant may revoke in writing at any time.

F. **Inspection and Correction of Personal Information**

1. In order to inspect, obtain a copy of, or ask for correction of their PI, Participants should contact the HMIS Privacy Officer in writing at: HMIS Privacy Officer, 121 Cleveland Avenue SW, Canton, OH 44702.
2. Participants may inspect and have a copy of their PI maintained by the Stark County System. An explanation will be offered regarding any information that Participants may not understand.
3. Any request(s) will be considered from Participants for correction of inaccurate or incomplete PI maintained about them. If the Stark County System agrees that the information is inaccurate or incomplete, the information may be deleted or marked as inaccurate or incomplete and to be supplemented with additional information.
4. Participant request(s) for inspection or copying of PI may be denied under any one or combination of the following circumstances:
 - a. the information was compiled in reasonable anticipation of litigation or comparable proceedings,
 - b. the information is about another individual,
 - c. the information was obtained under a promise of confidentiality and if the disclosure would reveal the source of the information, **or**
 - d. disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
5. If a request for access or correction is denied, the reason for the denial will be explained. Documentation of the request and the reason for the denial will be included as part of the PI maintained.
6. Repeated or harassing requests for access or correction may be rejected.

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G. Complaints

All complaints about Stark County System privacy and security policies and practices or the implementation of those policies and practices may be submitted to the HCCSC and/or the Participating Agency named above.