

AUSTIN/TRAVIS COUNTY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) PRIVACY POLICY STATEMENT

This agency collects information about people who ask about our homeless services and puts the information you give us into a computer program called Bowman Systems ServicePoint (or "Austin/Travis County HMIS"). Austin/Travis County HMIS data are all stored in one computer system maintained by the Ending Community Homelessness Coalition (or "ECHO"). This Privacy Policy Statement describes the practices connected with the Austin/Travis County HMIS computer program. A link to this Privacy Policy can be found on the HMIS section of the ECHO website. A copy of this Privacy Policy Statement, the Privacy Notice and the client ROI are available to clients upon request.

Scope

This Privacy Policy only applies to the information entered into the Austin/Travis County HMIS computer program and does not apply to any other website or computer program. We only collect information that we think is appropriate. The collection and use of all personal information is guided by strict standards of confidentiality as outlined in this Privacy Policy Statement.

This document is not a legal contract. We are required to provide and follow the practices described in this Privacy Policy. This Privacy Policy takes effect immediately and will remain in effect until we replace it. The Privacy Policy can be amended. Any changes may affect the uses of information collected before the policy change.

Purpose of Data Collection

When agencies that use the Austin/Travis County HMIS computer program meet with you, they may ask you for information about you and your family. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Additional personal information that we collect is important to run our programs, to improve the services for homeless persons, and to better understand the needs of homeless persons.

YOU HAVE THE RIGHT TO REFUSE TO ANSWER ANY QUESTION AT ANY TIME AND WILL NOT BE DENIED HELP, UNLESS WE NEED THAT INFORMATION TO KNOW IF YOU ARE ELIGIBLE FOR A SERVICE.

AUSTIN/TRAVIS COUNTY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) PRIVACY POLICY STATEMENT

What information is collected about you?

- Personal Identifying Information (such as name, social security number, and date of birth)
- Demographic Information (such as race, ethnicity, and gender)
- Who is in your household
- Your income and income sources
- Job history
- Services you request or receive
- Military history
- If you are homeless or not
- Living situation and housing history
- Reasons for seeking services
- Educational background
- Self-reported health needs

What happens to your information?

- When you request services from agencies that use the Austin/Travis County HMIS computer program, the agency will review the client Release of Information (ROI) that describes the data sharing rules within and outside of the Austin/ Travis County computer system.
- After you acknowledge that that you understand the Austin/Travis County data sharing rules, your information will be entered into the Austin/Travis County HMIS computer program, which is operated over the internet. The Austin/Travis County HMIS uses many security protections, as listed in the Security and Confidentiality section of this Privacy Policy, to ensure confidentiality.
- Your current and historical information will be shared with all agencies that use the Austin/Travis County HMIS system to help you get services more quickly and easily. We also share your information to help you get better services from our agencies. All current HMIS Agencies are listed on the client ROI document.
- If you provide verbal or written permission on the client ROI that you want to put treatment records about Mental Health, HIV/AIDS, or Drug, Alcohol, or Substance Abuse Treatment into our computer system as part of your Personal Information, that information will be entered into the Austin/Travis County HMIS system and will be shared with all agencies that use the Austin/Travis County HMIS system.

AUSTIN/TRAVIS COUNTY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) PRIVACY POLICY STATEMENT

- If you provide verbal or written permission on the client ROI for the additional sharing of your data outside of HMIS, then you and your family's current and historical information in the Austin/Travis County HMIS system may be shared directly outside of the computer system or with outside agencies for research, reporting, and coordinating services.

Uses and Disclosures of your Personal Information

Once you acknowledge that you understand the Austin/Travis County HMIS data sharing rules, your current and historical data may be used or shared to:

- provide and coordinate services to you and your family;
- carry out functions related to payment or reimbursement of services;
- carry out administrative functions, such as legal, audit, and management functions;
- provide different summary reports about homelessness as required by law or by the organizations that provide money for these programs.
- create deidentified personal information for additional analysis;
- meet the requirements of the law;
- prevent a serious threat to health or safety;
- report abuse, neglect or domestic violence to a government authority authorized by law to receive these types of reports when required by law, or when the individual agrees to the disclosure, or when the disclosure is allowable by regulations and we feel it is necessary to prevent serious harm to the individual or other potential victims;
- comply with law enforcement requests such as in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena; a limited and specific inquiry approved by a supervisory official of the law that is necessary for a law enforcement investigation.
- learn about how well we are serving our clients and to find ways to improve those services;
- understand the scope of need for our services in Austin/Travis County and to use that information when making decisions about ways to address and end homelessness.

If you provide verbal or written permission on the client ROI for the additional sharing of your data outside of HMIS, then you and your family's current and historical information may be shared directly outside of the computer system or with outside agencies for the following reasons:

- To help you get services quickly and easily;

AUSTIN/TRAVIS COUNTY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) PRIVACY POLICY STATEMENT

- To help you get better services from our agencies and coordinate your services;
- For research and reporting conducted by an individual or institution that has a formal relationship and a written data sharing agreement with ECHO that must:
 - (1) Establish rules and limitations for the processing and security of the information;
 - (2) provide for the return or proper disposal of the information after the research project is over;
 - (3) restrict additional use or disclosure of client personal information, except where required by law; and
 - (4) require that the recipient of data formally agree to comply with all terms and conditions of the agreement.

Security and Confidentiality Guidelines

- The Austin/Travis County HMIS operates over the internet. The site is encrypted with a security certificate that keeps the site secure and the information in it protected. Only agencies that use HMIS in Austin/Travis County can view and enter information into the Austin/Travis County HMIS program. Austin/Travis County HMIS users have a password-protected login to the HMIS computer program. Also, Austin/Travis County HMIS users receive training on the privacy and security standards outlined in this Privacy Policy Statement and must sign a confidentiality agreement where they agree to comply with this Privacy Policy.
- Agencies using the Austin/Travis County HMIS will uphold Federal and State Confidentiality regulations to protect client records and privacy. In addition, they will only release client records outside of the Austin/Travis County HMIS computer system with written consent by the client, unless otherwise provided for in the regulations.
- Agencies using the Austin/Travis County HMIS must abide by the HMIS Privacy and Security Standards as outlined in the HMIS Data and Technical Standards. This Privacy Policy Statement was written in accordance with those standards.
- Agencies using the Austin/Travis County HMIS will abide specifically by the Federal confidentiality rules regarding disclosure of alcohol and/or drug abuse records.
- Agencies using the Austin/Travis County HMIS will abide specifically by State of Texas, the City of Austin or Travis County general laws providing guidance for release of client level information including who has access to client records, for what purpose and audit trail specifications for maintaining a complete and accurate record of every access to and every use of any personal data by persons or organizations.

AUSTIN/TRAVIS COUNTY HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) PRIVACY POLICY STATEMENT

What are your rights under the Privacy Policy?

- You can refuse to answer **any** question at **any** time, including questions about the things listed on page 2 of this document. You will never be denied help because you didn't answer a question, unless we need that answer to know if you are eligible for a service.
- Your permission to share your current and historical information will last for seven years from the date you sign the client ROI. You can cancel this permission at any time by sending a written letter to the agency where you filled out this form. It may take up to three business days to process this cancellation letter.
- You have the right to view and get a copy of your information that is entered into the Austin/Travis County HMIS system, except in circumstances such as in advance of legal proceedings, if there is information about another individual, if information was provided under a promise of confidentiality, if the sharing of the information would threaten the life or physical safety of an individual. You have the right to receive an explanation about any of your information that you do not understand.
- You have the right to request for a correction when your information in the Austin/Travis County HMIS system is incorrect or incomplete.
- You have the right to get a copy of this Privacy Policy Statement, the ROI and the Privacy Notice.

COMPLAINT PROCESS:

If you have a complaint about the Austin/Travis County HMIS privacy and security policies and practices, please contact the ECHO HMIS Director.

ECHO – HMIS Director OR Call the HMIS Director:
100 N. IH35, Suite 1003 (512) 910-4604
Austin, TX 78701