

## Baltimore City Homeless Information Management System (HMIS) Privacy Notice

This notice describes how information about you may be used and shared when participating in the program(s) and the Agency listed below. This notice also describes your rights. This privacy notice may be changed at any time, and those changes may affect data collected by this agency before the date of the change. Changes regarding data use or disclosure will be effective with respect to data processed before the change, unless otherwise specified.

Agency:	
Program(s):	

This agency participates in the Homeless Management Information System (HMIS), which collects information about persons receiving homeless and housing assistance in the City of Baltimore. This agency only collects information that is considered to be appropriate for the purposes outlined below:

- to provide or coordinate services
- to identify other programs that may assist you
- to produce reports regarding use of services
- to track agency-level and system-level outcomes
- to support service system planning
- to identify service needs and gaps in our community
- for agency operational purposes, including administrative functions such as legal, audits, personnel, and management
- to conduct research for governmental and educational purposes
- to further additional partnerships entered into by the Baltimore City Continuum of Care (CoC)

When you receive services from a Participating Agency, information about you and the services you received is entered into the HMIS software. All of the information entered is shared within the agency that collected the information and with the Mayor's Office of Homeless Services, the agency that manages the system. Information may be automatically included in reporting to Federal, State or Local agencies, as required by funding agreements. This includes matching, sharing or transfer of Client Personally Identifiable Information to a secure data repository or data warehouse, including but not limited to the Veteran Status Query and Response Exchange System, and the Maryland State Data Warehouse. Data may also be disclosed when required by law (i.e. court order).

Other Participating Agencies will automatically have access to some of your information. These elements are listed on the *Client Informed Consent for Release of Information* form. These elements are automatically shared to assist with service coordination and prevent duplication of records.

<u>You may choose</u> to participate in additional sharing, which includes sharing all information with all Participating Agencies in the HMIS, as well as sharing information with approved external entities for the purposes of research, reporting or service coordination. All entities wishing to receive data transfers, participate in data sharing or matching must develop a Memorandum of Understanding (MOU) with the Mayor's Office of Homeless Services and are vetted and approved by the Data and Performance Committee. The method and criteria used to evaluate Data Sharing MOUs is available in the HMIS Policies and Procedures.

All persons served must complete a *Client Informed Consent for Release of Information* and indicate whether they do or do not consent to share their additional information. You have the ability to revoke your consent at any time without

penalty.



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Participating Agencies and additional organizations are approved following criteria set by Baltimore City Continuum of Care Data & Performance Committee in the HMIS Policies and Procedures, and must agree to follow HMIS Security and Privacy protocols. A list of Participating Agencies and additional organizations authorized to receive HMIS data may be requested or found at <u>https://homeless.baltimorecity.gov/privacy-security.</u>

Programs whose primary mission is to serve victims of domestic violence are prohibited from entering personally identifying information about victims into HMIS, and instead will record information in a comparable database. Victim Service Providers only report information in the aggregate totals that does not identify a victim. Data on victims of domestic violence served by mainstream service providers is entered into HMIS and is subject to the same data sharing policies outlined in this document. Victims served by a mainstream organization may elect not to share their full information or be entered anonymously, however their basic client information will still be globally shared among HMIS Participating Agencies.

You have a right to ask for and receive a copy of our privacy policies. You also have the right to request a copy of the information about you stored in the HMIS and to request changes to this information.

**Privacy complaints and security concerns** must be submitted by the agency's HMIS Representative and the HMIS Lead Agency. The HMIS Representative for this agency is:

## Name: Phone: Email:

If you are uncomfortable reporting your complaint to the Service Provider, the privacy complaint or security concern may be reported solely to the HMIS Lead Agency. Privacy complaints or security concerns to the HMIS Lead Agency can be sent to <u>hmis@baltimorecity.gov</u> or 410.396.4647 or 7 E. Redwood Street, 5<sup>th</sup> Floor, Baltimore, MD 21202. If you are uncomfortable reporting your complaint or concern to the Service Provider or HMIS Lead Agency, you may report it directly to the Chair of the Baltimore City CoC Data & Performance Committee.

Complaints or concerns may be submitted anonymously to any of the above contacts.