

***East Missouri Action Agency***  
**Homeless Management Information System (HMIS)**  
**Privacy and Security Notice**

**A written copy of this Policy is available to all who request it.  
It is also available on this agency's web site.**

**I. PURPOSE:**

This notice describes the privacy policy of this agency. The policy may be amended at any time. We may use or disclose your information to provide you with services, and to comply with legal and other obligations. We assume that, by requesting services from our agency, you agree to allow us to collect information and to use or disclose it as described in this notice and as otherwise required by law.

The Homeless Management Information System (HMIS) was developed to meet a data collection requirement made by the United States Congress and the Department of Housing and Urban Development (HUD). Congress passed this requirement in order to get a more accurate count of individuals who are homeless and to identify the need for and use of different services by those individuals and families. We are collecting statistical information on those who use our services and report this information to a central data collection system.

In addition, many agencies in this area use HMIS to keep computerized case records. This information may be provided to other HMIS participating agencies. The information you may agree to allow us to collect and share includes basic identifying demographic data, such as name, address, phone number and birth date; the nature of your situation and the services and referrals you receive from this agency. This information is known as your **Protected Personal Information or PPI**. All agencies using the HMIS share their data with other participating agencies, with the exception of *Blind Service Providers*. These *blind* agencies serve specific protected client populations, such as domestic abuse, sexual abuse, HIV/AIDS, alcohol and/or substance abuse, and mental health, and do not share client information.

**GENERALLY**, all personal information we maintain is covered by this policy. Generally, your personal information will only be used by this agency and other agencies to which you are referred for services.

Information shared with other HMIS agencies helps us to better serve our clients, to coordinate client services, and to better understand the number of individuals who need services from more than one agency. This may help us to meet your needs and the needs of others in our community by allowing us to develop new and more efficient programs. Sharing information can also help us to make referrals more easily and may reduce the amount of paperwork.

Maintaining the privacy and safety of those using our services is very important to us. Information gathered about you is personal and private. We collect information only when appropriate to provide services, manage our organization, or as required by law.

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**II. CONFIDENTIALITY RIGHTS:**

This agency has a confidential policy that has been approved by its Board of Directors. This policy follows all HUD confidentiality regulations that are applicable to this agency, including those covering programs that receive HUD funding for homeless services. Separate rules apply for HIPAA privacy and security regulations regarding medical records.

This agency will use and disclose personal information from HMIS only in the following circumstances:

1. To provide or coordinate services to an individual.
2. For functions related to payment or reimbursement for services.
3. To carry out administrative functions including, but not limited to legal, audit, personnel, planning, oversight or management functions.
4. Databases used for research, where all identifying information has been removed.
5. Contractual research where privacy conditions are met.
6. Where a disclosure is required by law and disclosure complies with and is limited to the requirements of the law. Instances where this might occur are during a medical emergency, to report a crime against staff of the agency or a crime on agency premises, or to avert a serious threat to health or safety, including a person's attempt to harm himself or herself.
7. To comply with government reporting obligations.
8. In connection with a court order, warrant, subpoena or other court proceeding where disclosure is required.

**III. YOUR INFORMATION RIGHTS:**

As a client receiving services at this agency, you have the following rights:

1. **Access to your record.** You have the right to review your HMIS record. At your request, we will assist in viewing the record within five working days.
2. **Correction of your record.** You have the right to request to have your record corrected so that information is up-to-date and accurate to ensure fairness in its use.
3. **Refusal.** Our ability to assist you depends on having certain personal identifying information. If you choose not to share the information we request, we reserve the right to decline to provide you with services as doing so could jeopardize our status as a service provider.
4. **Agency's Right to Refuse Inspection of an Individual Record.** Our agency may deny you the right to inspect or copy your personal information for the following reasons:
  - a. information is compiled in reasonable anticipation of litigation or comparable proceedings;
  - b. information about another individual other than the agency staff would be disclosed;