

# Community Action Partnership of Sonoma County HMIS Privacy Policy Notice

## What is HMIS?

Community Action Partnership of Sonoma County participates in a county-wide project called the Homeless Management Information System (HMIS), which collects information on people who are homeless or at risk of homelessness. HMIS is administered by the Sonoma County Community Development Commission (SCCDC) in cooperation with this Agency and other agencies in Sonoma County that provide services to benefit homeless persons. We enter the information into a secure computerized database for storage and analysis. All persons having access to HMIS information must agree to keep the information strictly confidential.

You do not have to provide personal identifying information for use in HMIS however; you may be required to provide personal identifying information to prove your eligibility for a program or service. You will receive services from us whether or not you agree to provide personal identifying information for use in HMIS. However, your cooperation in providing information will assist us and other agencies to provide services and housing to you and others more effectively. **We are required to report in HMIS that you received services whether or not you provide personal identifying information.**

## Why is information collected for HMIS?

Information collected for HMIS will help us and other agencies to understand the extent, nature, and causes of homelessness in Sonoma County. It will also help us and other agencies providing services to the homeless to better understand what types of services you need, to assess what services are available to you, to develop new services, to monitor whether your needs are being met, and to improve the quality of care and services for homeless individuals and families. We also collect information that is required by law or by organizations that give us money to operate this program.

## How will information you give us be used and disclosed?

Information you consent to give to us for use in HMIS will be used in the following ways:

- By HMIS staff at the SCCDC, to administer the HMIS, to ensure the data in the system is accurate and valid, to fix problems in the computer system, and to test the system;
- By HMIS staff at the SCCDC, to prepare reports that contain “de-identified” information for the purpose of sharing data and preparing reports for HMIS users, government agencies and policy-makers, and the public generally. “De-identified” means that your name, social security number, address, zip code, or any other information that could be used to identify you personally will **not** appear in any of the data or reports released by an HMIS user or the SCCDC;
- By us, to verify the accuracy of information entered by the SCCDC into the HMIS database;
- By other agencies participating in HMIS, in order to assist those agencies to more effectively provide and coordinate services for you.

In addition to the uses above, we may also use and disclose information you provide us in the following ways:

- For functions related to payment or reimbursement for services;
- To carry out internal administrative functions;
- To create “de-identified” statistical reports;
- To report abuse, neglect, or domestic violence, but only to the extent that such reports are required by law;
- To prevent or lessen a serious and imminent threat to the health or safety of a person or the public, including the target of a threat, if permitted by applicable law;
- In response to a warrant, subpoena, summons, or lawful court order, or in response to a written or oral requests by a law enforcement official under certain circumstances;
- To a law enforcement official, if we in good faith believe a crime has occurred on our premises;
- To an individual or institution for academic research purposes;
- To authorized federal officials for the conduct of certain national security or certain activities associated with the protection of certain officials.

## What rights do you have regarding your information?

You have the right to see and receive a copy of the information that we maintain about you, except for information compiled in anticipation of litigation, information about another individual, information obtained under a promise of confidentiality, or information that would, if disclosed, endanger the life or safety of another. We will consider changing any information about you if you believe the information in our records is inaccurate.

## What should you do if you think your privacy rights have been violated?

We take your privacy rights seriously. If you believe that your privacy rights have been violated, you may send a written complaint to this Agency or to the HMIS Administrator at Sonoma County Community Development Commission. This Agency and the SCCDC are prohibited from retaliating against you for filing a complaint.

## Can this notice change in the future?

We and the SCCDC may amend this Notice at any time, and the amendment may affect information obtained by us before the change. The revised Notice will be posted at the Sonoma County Housing Authority at all times and may be obtained by contacting the Agency in writing and asking for a copy of any new Notice.

If you have further questions about the notice or about your rights, please contact this Agency or the SCCDC. Note, however, that the Agency and SCCDC cannot give legal advice to you regarding your rights.

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