HMIS Privacy and Security

Raleigh/Wake

WAKE COUNTY
Continuum of Care - NC 507

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Course Objective

Orient Clarity Human Services users to HMIS requirements and best practices for privacy and security.

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Course Content

☑ HMIS and Privacy Overview

☑ Client Consent

☑ Protecting Personally Identifiable Information (PII)

☑ Clarity Human Services Privacy Features

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HMIS and Privacy Overview

- What is Privacy and PII?
- Why Does Privacy Matter?
- What is HMIS?

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What is Privacy?

Privacy is a set of fair information practices to ensure:

Personal information is accurate, relevant, and current.

All uses of information are known and appropriate.

Personal information is protected.

Allows clients choice in how their data is used or disclosed.

Why Privacy Matters

TRUST

- Highly Personal and Sensitive Information
- Essential to accurate and complete information gathering
- Essential to successful engagement

VULNERABILITY

- Susceptible to abuse
- Access to client information raises safety concerns

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What is PII?

Personally Identifiable Information that alone or in combination with other information can identify a person.

GENERAL PII
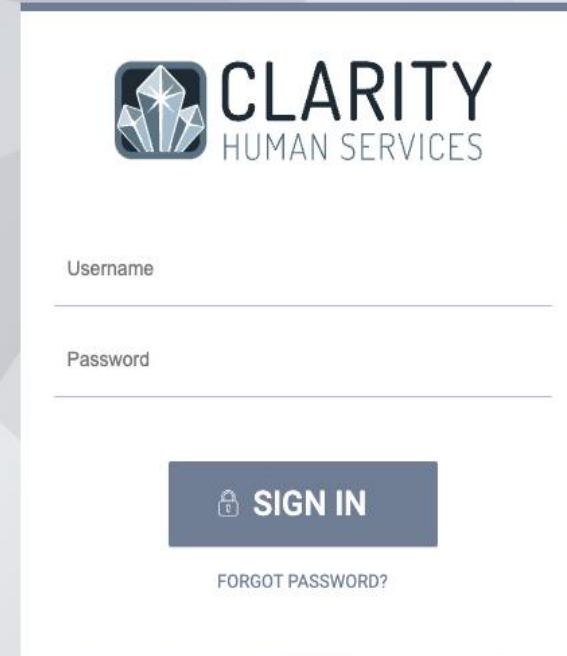
- Name
- Data of Birth
- SSN
- Addresses
- Photo

SENSITIVE PII

- Financial
- Medical
- Substance Abuse
- Legal/Criminal
- Immigration Information
- Children/Minors
- Domestic Violence

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What is HMIS?

- Congressional mandate for all communities and programs receiving HUD grants.

- Contributes to homeless service system improvements and funding

- State and Federal regulations set specific HMIS data privacy and security standards.

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Knowledge Check

True or False?

Question:

General PII includes: Name, Date of Birth, Social Security, and Phone Number?

Answer:

FALSE!

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Knowledge Check

True or False?

Question:

Federal and State laws require that specific privacy and security standards are met for HMIS Data.

Answer:

TRUE!

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CLIENT CONSENT

- What is client consent?
- Tips for obtaining consent
- Setting client record to "Private"

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Informed Consent

- Clients should understand what they are consenting to

- The consent (ROI) should be available for the client to review and take with them if they choose. (Recommendation: Have a few copies printed out just in case)

- The consent form (ROI) available on the website

- HUD Required Posting sign about why the data is being collected

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Tips for obtaining consent

Clients only need to consent once which is good for one year after signed.

Be familiar with the language of the ROI.

Be able to explain HMIS and the ROI.

Our HMIS has state of the art security protocols.

Assure the client of concern for security

Only de-identified/aggregate data is reported.

Role play with a colleague.

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How to set a client record to "Private"

- Click on the Shield Icon

- Client on "Private"

- Click on "Save Changes"

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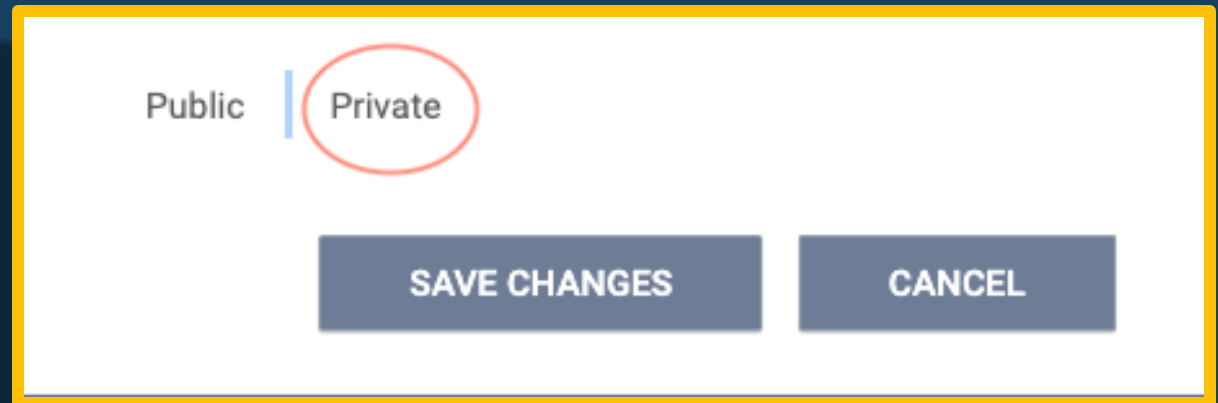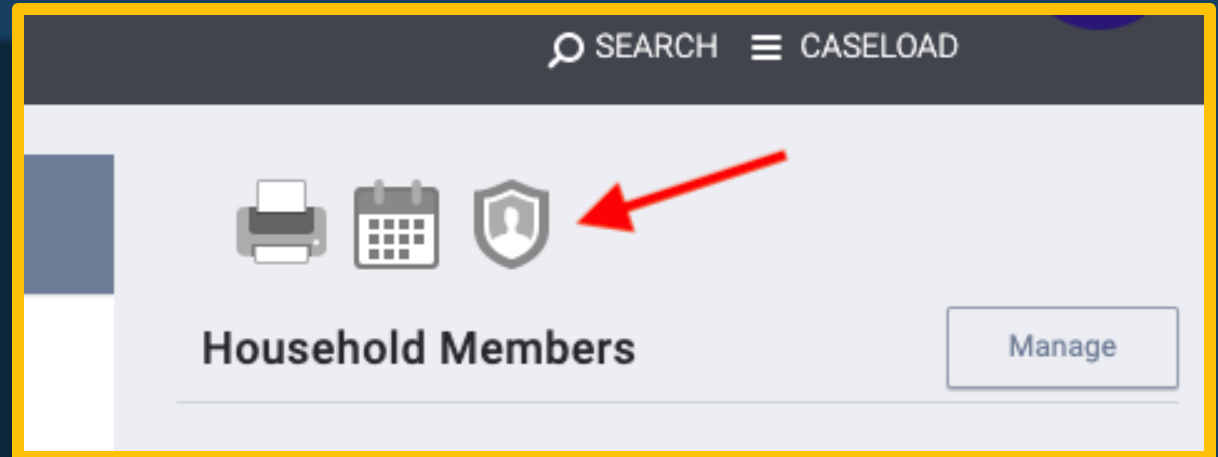
Knowledge Check

True or False?

Question:

If a client is already in the system, and has an ROI on file, I don't need to ask them for consent to enter data in the system.

Answer:

TRUE!

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Knowledge Check

True or False?

Question:

If a client refuses consent, I should not enter any data into the system.

Answer:

FALSE!

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Privacy and Security Practices

Data Collection

Appropriate Use

Appropriate Storage

Appropriate Sharing

Destroying Data

Security Breaches

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Data Collection

Be familiar with the information to be collected
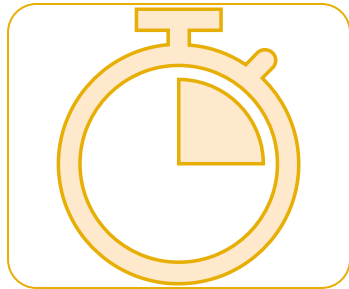
Enter data in a timely basis according to Wake County standards

Accurately gather and enter information

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APPROPRIATE STORAGE

HMIS desktops and pre-approved mobile devices should be encrypted

Do not download PII to desktop or agency shared drive

Do not download data to a flash drive

Keep HMIS laptops and mobile devices in your possession

Lock up printed PII information

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Security

Never share your password or username	Do not write down your password	Protect your screen from passersby	Lock your workstation and mobile devices

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APPROPRIATE SHARING
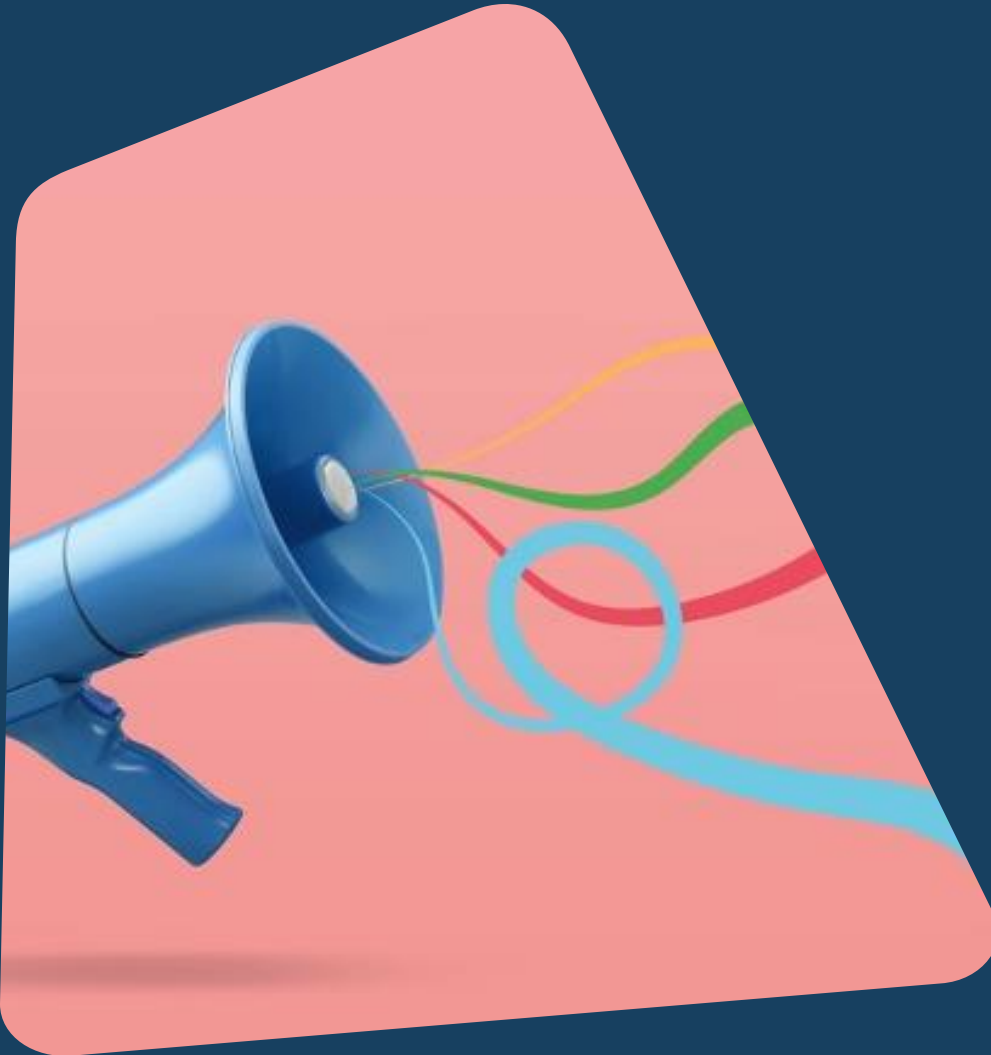
Only share PII in carefully controlled situations:

- Never in an unencrypted email

- Only those authorized to see it *and* have a business need related to service the client

- Remove PII from reports when it is not needed.

ONLY for business purposes related to serving clients through your program or program or referral programs

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Destroying Data

Shred printed data when obsolete

Downloaded PII on computer– electronically "shred" the file

After 7 years with no activity, client data will be removed from HMIS

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If you see something, say something.

Immediately report security breaches or improper security practices to the Security Officer for your agency, who must report to the Security Officer and System Administrator for the Continuum of Care (CoC).

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Knowledge Check

Question:

When is it okay to share client information?

Answer:
a) When any coworker asks?
b) When a HMIS user at another agency needs to serve a client
c) When a police office or government official asks
d) When another HMIS user at your agency needs to review data for accuracy

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Knowledge Check

Question:

When is it okay to share client information?

Answer:

a) When any coworker asks. Incorrect

b) When a HMIS user at another agency needs to serve a client.
    Correct!

c) When a police office or government official asks. Incorrect

d) When another HMIS user at your agency needs to review data for
    accuracy. Correct!

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Knowledge Check

Question:

How is it okay to share client PII information with an authorized person?

Answer:
a) By Email
b) By Telephone
c) By Text Message
d) Using the built-in message system in HMIS if the client has an ROI in the system

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Knowledge Check

Question:

How is it okay to share client PII information with an authorized person?

Answer:

a) By Email. Incorrect

b) By Telephone. Correct!

c) By Text Message. Incorrect

d) Using the built-in message system in HMIS if the client has an ROI in the system Correct!

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Security Features

HMIS USER POLICY AND PASSWORD

SECURE MESSAGES

DEFAULT PRIVACY SETTINGS

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User Policy

- Read the User Policy as it will expire annually

- Protect your password

USER POLICY AGREEMENT

The Homeless Management Information System (HMIS) is administered by Urban Ministries of Wake County Inc. (UMWC) as designated by NC-507 Continuum of Care Governing Board with oversight for implementation and policies provided by the Data Advisory Committee and CoC Governing Board. HMIS is an internet-based data collection application designed to capture information about the numbers, characteristics, and needs of people experiencing homelessness and those at-risk of homelessness over time.

User Ethical Standards

Users must ensure that their clients are fully aware that their Personally Identifying Information will be entered into HMIS and shared per the Release of Information.

Users must follow the consent requirements of Clarity and any additional requirements of their Partner Agency.

Users must allow their clients to decide what personally identifying information can be entered into HMIS and shared with Partner Agencies. Client consent may be revoked by the client at any time by a written notice.

No client may be denied services for failure to provide consent to share HMIS data.

Users will uphold the client's right to inspect, copy, and request changes in their HMIS records.

Discriminatory comments based on race, color, religion, national origin, ancestry, disability, age, sex, sexual orientation, gender, or perceived gender identity are not permitted in HMIS.

User Responsibilities

Users must abide by user responsibilities and other provisions of the Clarity Operating Policies and Procedures.

I understand if I have received services or housing and have a client account in HMIS, I am prohibited from editing my own file.

I agree I will not edit the HMIS accounts of my immediate family members.

I have read and will abide by all policies and procedures in the Clarity Operating Policies and Procedures.

I understand that in order to receive an HMIS license I must complete training as outlined in Clarity Operating Policies and Procedures. (See Wake County HMIS website: wake.bitfocus.com)

I will only collect, enter, and extract data in HMIS relevant to the delivery of services for the clients with whom I work.

I understand that my User ID and password are for my use only and must not be shared with anyone.

I agree to keep my HMIS user-login and password secure. I will not use the browser capacity to remember passwords. I will enter my password each time I open HMIS.

I agree to not leave my computer unattended while logged into the system and will log out of the system each time before leaving my work area.

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Default Privacy Settings

- Appropriate user access level

- Sharing Settings
  - Types of data to share
  - Who to share it

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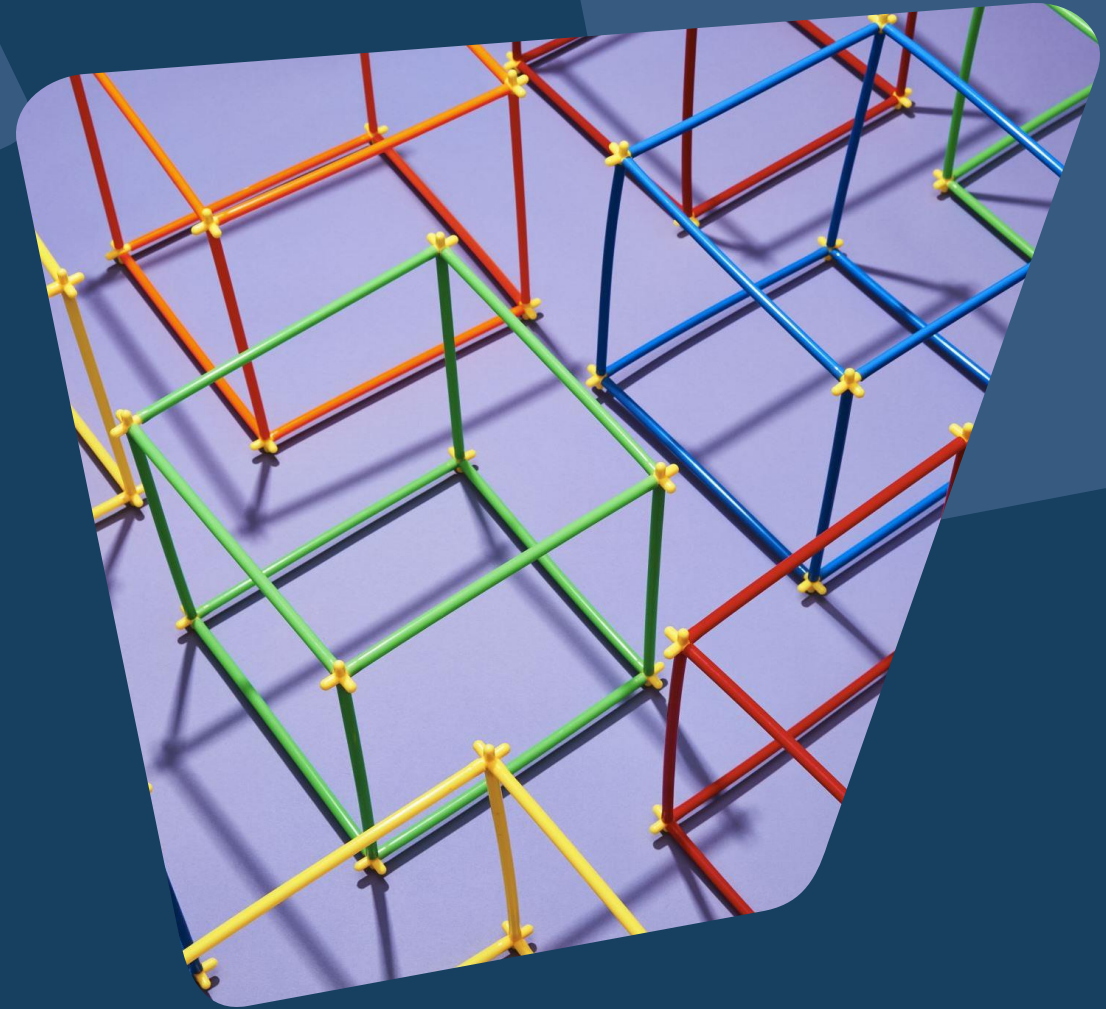
Knowledge Check

True or False?

Question:

Secure Messages are a good way for HMIS users to communicate with each other about identified clients, with an ROI in the system.

Answer:

- TRUE!

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Knowledge Check

True or False?

Question:

When I sign the HMIS User Policy, I am saying that I understand and agree to all the statements in the document

Answer:

- TRUE!

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RESOURCES

- Website:
  - wake.bitfocus.com

- The Wake County HMIS Help Center Support Desk
  - Email: support@bitfocus.com
  - Phone: (800) 594-9854 x2

- Bitfocus Wake County Community Administration Team:
  - Email: wake-admin@bitfocus.com

- Chat:

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