

CDSA HMIS Privacy Notice



This notice describes the privacy practices of our agency with respect to our use of a database system administered by CDSA, Inc.

Management Information System: We participate in a database system called WellSky Community Services (formerly ServicePoint) that allows community service centers, food pantries, shelters, housing projects, and other social service providers to coordinate services for the people we serve. There is a list of the agencies that participate in the system on www.cdsaok.org. Law enforcement agencies and Oklahoma Department of Human Services do not have access to this system.

Personally Identifiable Information: We collect “Personally Identifiable Information” which identifies you as an individual. This includes your name, date of birth, Social Security Number, or other information that is unique to you. This information is visible in the system to the agencies that use it to coordinate services. If you have a safety concern about other agencies viewing your Personally Identifiable Information, please discuss this with the contact person identified at the end of this document (page 3).

Program Enrollment Information: When you receive services from us, we collect Program Enrollment Information, which may include and information about your race, ethnicity, disabling conditions, previous residence history, income, and other information required by the funders of these services. This information will be visible to other agencies that use the system to coordinate services unless you indicate to us that you do not want your Program Enrollment Information to be visible. It is important to be aware that some projects require information be shared between agencies because they are coordinating services. If a service has a data sharing requirement, then you must share to be eligible for the service. You will be advised of a sharing requirement at the time of project intake.

How We May Use and Disclose Your Information: We may use and disclose your information for the following purposes:

- To provide or coordinate services on behalf of an individual or household
- For functions related to payment or reimbursement for services
- To carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions
- For creating de-identified data (where your Personally Identifiable Information has been removed)

Other Uses and Disclosures: We may use or disclose your Information for other reasons, even without your permission. Subject to applicable federal or state law, we are permitted to disclose your Information without your permission for the following purposes:

- Required by Law: We may use/disclose your Personally Identifying Information when such use/disclosure is required by law, subject to the requirements of such law.
- Serious threat to health or safety: We may use and disclose your Personally Identifying Information when necessary to prevent a serious threat to your health and safety or the health

and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

- Abuse, Neglect or Domestic Violence: We may disclose your Personally Identifying Information when the disclosure relates to victims of domestic violence, abuse or neglect, or the neglect or abuse of a child or an adult who physically or mentally incapacitated, where the disclosure is required by law, you agree to such disclosure, or the disclosure is authorized by law and we believe it is necessary to prevent serious harm to you or other potential victims.
- Research: Subject to certain restrictions, we may use or disclose your Personally Identifying Information for approved academic research conducted by an individual or institution that has a formal relationship with us and a written research agreement that requires researchers and data recipients to protect your Personally Identifying Information.
- Law enforcement purposes: Subject to certain restrictions, we may disclose your Personally Identifying Information under certain circumstances if required by law.

Authorization to Use or Disclose Your Personally Identifying Information to a Third Party: Before using or disclosing your Information to a third party (an agency not using the system such as your doctor, a funder of a project you are enrolled in, or another service provider), we will ask for your verbal or written authorization before disclosing your Information. If you choose to agree to disclose your Information, you can later revoke that authorization to stop any future uses and disclosures. However, you cannot revoke your authorization for past uses and disclosures that we have made.

Destruction and De-Identification of Your Personally Identifying Information: We will dispose of or, in the alternative, remove identifiers from, Personally Identifying Information that is not in current use even years after your Personally Identifying Information was created or last changed, unless a statutory, regulatory, contractual, or other requirement mandates we keep it longer.

Request Restrictions: You may request restrictions on uses and disclosures of your Personally Identifying and Program Enrollment Information, unless such restriction is inconsistent with our legal requirements or programmatic and business requirements necessary to operate the program. We are not required to agree to such restrictions, but if we do agree, we must abide by those restrictions.

When you seek services from our Agency, you are verbally informed and/or provided with a brief written Privacy Policy statement called the HMIS Privacy Script. If you choose not to allow your information to be visible to the agencies using the system to coordinate services, then you will be asked to complete a form documenting your decision. This is done to ensure that you were given information about restricted access to some services.

You will still be eligible for most Emergency Services at this Agency or we will refer you to an agency that provides Emergency Services. The ability of this Agency and the network of social service providers using this system to provide supportive services, including housing, may be reduced if you decide to not share information to the other agencies using the system.

- If you are eligible for Supportive Services for Veteran Families (SSVF) projects, you are required to share your Personally Identifying and Program Enrollment Information. Veterans who are homeless and wish to receive housing assistance will need to agree to share information in order to be referred to housing from the Veteran By Name List.
- If you are on the Front Door Coordinated Entry Central Waitlist for Permanent Supportive Housing, Rapid Rehousing, or Transitional Housing, you will need to share your Personally Identifying and Program Enrollment Information in order to be referred to a housing provider.

If you decide to not share your information in the system with the other agencies coordinating services, then you will be asked to provide your all your Personally Identifying and Program Enrollment Information each time you visit an agency that uses this system.

You can request that the restrictions on your Personally Identifying and Program Enrollment Information in the system be changed. You can later agree to share or revoke the visibility of Personally Identifying and Program Enrollment Information to other agencies using the system for any future data entered in to system. However, you cannot restrict visibility for past uses and disclosures that we have made.

Inspect and Obtain Copies: You have the right to inspect and obtain a copy of Personally Identifying and Program Enrollment Information for services we have provided to you. We can also explain to you any information you may not understand.

Amend Information: If you believe that the Personally Identifying Information in your record is incorrect, or if important information is missing, you have the right to request that we correct the existing information or add the missing information. We are not required to remove any information but we may mark information as inaccurate or incomplete and may supplement it with additional information. If you believe there is an error in the system, please discuss this with the contact person identified at the end of this document (page 3)

We reserve the ability to rely on the following reasons for denying an individual inspection or copying of your Personally Identifying Information:

- Information compiled in reasonable anticipation of litigation or comparable proceedings
- Information about another individual
- Information obtained under a promise of confidentiality if disclosure would reveal the source of the information
- The disclosure information which would be reasonably likely to endanger the life or physical safety of any individual

We can reject repeated or harassing requests for access or correction. If we do, we will explain the reason for the denial to you and we will include documentation of the request and the reason for the denial as part of your Personally Identifying Information.

Changes in Privacy Practices: We reserve the right to change our privacy policies and the terms of this Notice at any time and to make the new policies and provisions effective for all Personally Identifying Information, even with respect to the information processed before the amendment.

You have the right to obtain a paper copy of this Notice at any time upon request.

Grievance Process: This agency has a grievance process you can use to address privacy rights you feel were violated. You can request a grievance form from the Agency Contact listed below.

Agency Contact: To make a request, file a concern or complaint, or ask a question please contact the person listed below.

AGENCY NAME: _____		
<input type="text"/>	<input type="text"/>	<input type="text"/>
Agency Contact Name	Contact email address	Contact phone number