CC-HMIS Privacy Policy

This Policy describes the privacy practices related to client data in the Columbus-Muscogee / Russell County Continuum of Care Homeless Management Information System (CC-HMIS). It is managed by Home for Good, which serves as the HMIS and CoC lead agency in the Continuum of Care (CoC) GA-505. This Policy describes how this data may be used or disclosed. Clients’ personal information is collected only when appropriate and great care is taken to keep clients’ personal information private.

Clients agree to allow collection of their personal information and its use or disclosure as described in this Policy by way of signed consent. Clients can inspect their personal information that is maintained in CC-HMIS. Clients can ask the Contributing HMIS Organization (CHO)to correct inaccurate or incomplete information. The CC-HMIS Administrator responds to questions and complaints. A copy of this Privacy Policy is available upon request, and on the lead agencies website: www.homeforgoodcv.org.

**Scope**

This Policy only applies to transactions made and data gathered in CC-HMIS and does not apply to any other database. The terms of this Policy shall govern all interactions with CC-HMIS. A link to the Policy can be found on the HMIS section of Home for Good’s website and is also available at each organization (CHO) that uses CC-HMIS.

**Purpose of This Notice**

This Policy is not a legal contract. We are required by law to maintain the privacy of clients’ private personal information. Upon request we will provide clients with a copy of this Policy and get their written acknowledgement of its receipt. We must follow the terms of this Policy that are currently in effect.

Changes to our privacy practices and the terms of this Policy may apply to current and future client information. We reserve the right to change this Policy at any time. If this Policy is changed, a copy of the revised Privacy Policy is available upon request at all CHOs, website www.homeforgoodcv.org.

**Our Legal Duty**

We are required by applicable federal and state law to maintain the privacy of clients’ personal information. We are required to provide this Policy of our privacy practices, legal duties, and clients’ rights concerning their private personal information. We must follow the privacy practices that are described in this Policy while it is in effect. This Policy takes effect immediately, and will remain in effect until we replace it.

We reserve the right to change our privacy practices and the terms of this Policy at any time, provided such changes are permitted by applicable law. We reserve the right to make the changes in our privacy practices and the new terms of our Policy effective for all private personal information that we maintain, including private personal information we created or received before we made the changes. Before we make a significant change in our privacy practices, we will change this Policy and make the new Privacy Policy available upon request.

**Reasons for Disclosures**

**For Law Enforcement Purposes**

We may disclose private personal information about CC-HMIS clients to law enforcement officials for law enforcement purposes, such as:

-In response to a court order, subpoena or other legal proceeding.

-To identify or locate a suspect, fugitive, material witness or missing person.

-When information is requested about an actual or suspected victim of a crime.

-To report a death as a result of possible criminal conduct.

-To investigate allegations of misconduct that may have occurred on our premises.

-To report a crime in emergency circumstances.

-For other purposes as required by law.

**Funeral Directors, Coroners and Medical Examiners**

We may disclose clients’ protected personal information as necessary to allow these individuals to carry out their responsibilities.

**National Security and Intelligence**

We may disclose clients’ protected personal information to authorized federal officials for national security and intelligence activities.

**Uses or Disclosures That Require Client’s Authorization**

Other uses and disclosures will be made only with client’s written authorization. A client may cancel an authorization at any time by notifying the HMIS Administrator writing of his/her desire to cancel it. If the client cancels an authorization it will not have any effect on information that we have already disclosed. Examples of uses or disclosures that may require client’s written authorization include the following:

-A request to provide private personal information to an attorney for use in a civil law suit.

-A request to provide private personal information to a requesting medical professional.

**For Research Projects with Contracted Third Parties**

We may disclose client data for research purposes only if the following conditions have been met:

-A signed memorandum of understanding (MOU) with the organization is in place before any data is shared.

-The data will be shared for a predetermined time period as stated in the contract with the contractor.

-The use and scope of the data research is provided as part of the contract.

**Rights under the Privacy Policy**

The information contained in client’s record maintained by the CC-HMIS software is the physical property of Home for Good. Clients whose data exist in CC-HMIS have the following rights:

**Right to Request Restrictions**

The client has the right to ask us not to use or disclose his/her private personal information for a particular reason related to our services or our operations. The client may ask that family members or other authorized individuals not be informed of specific private personal information. That request must be made in writing to our HMIS Administrator. If we agree to the request, we must keep the agreement, except in the case of a medical emergency or law enforcement.

**Right to Inspect and Copy Protected Personal Information**

The client has the right to request to inspect and obtain a copy of his/her private personal information. The client must submit the request in writing to our HMIS Administrator. If the client requests a copy of the information or we provide a summary of the information we may charge a fee for the costs of copying, summarizing and/or mailing it to the client.

If we agree to the request we will tell the client. We may deny the request under certain limited circumstances. If the request is denied, we will let the client knows in writing and he/she may be able to request a review of our denial.

**Right to Request Amendments to Protected Personal Information**

The client has the right to request that we correct his/her personal information. If the client believes that any private personal information in the record is incorrect or that important information is missing, he/she must submit the request for an amendment in writing to our HMIS Administrator. We do not have to agree to the request. If we deny the request we will tell the client why. The client has the right to submit a statement disagreeing with our decision.

**Right to an Accounting of Disclosures of Private Personal Information**

The client has the right to find out what disclosures of his/her private personal information have been made. The list of disclosures is called an Accounting. The Accounting may be for up to six (6) years prior to the date on which the request has been made. We are not required to include disclosures for services, payment or operations or for National Security or Intelligence purposes, or to correctional institutions and law enforcement officials. The right to have an Accounting may be temporarily suspended if it will impede Home for Good’s activities. The notice of suspension should specify required duration of the suspension Requests for an accounting of disclosures must be submitted in writing to our HMIS Administrator. The client is entitled to one free Accounting in any twelve (12) month period. We may charge the client for additional Accountings.

**Other Information**

**Contact Info to Obtain a Copy of the Policy or File a Complaint**

For any questions regarding this privacy policy, please contact:

Home for Good (Attn: HMIS Administrator)

 1100 5th Ave.

Columbus, GA 31901

Phone: 706-327-3255 Fax: 706-571-2271

Email: mshell@unitedwatyofthecv.org

To file a complaint with us, contact the HMIS Administrator by phone or by mail at the contact address provided above:

HMIS Administrator: Merlecia Shell

We support clients’ right to protect the privacy of their personal information. We will not retaliate

in any way if a client chooses to file a complaint with us.

You can find view this policy in the HMIS section of Home for Good’s website: [www.HomeforGoodcv.org](http://www.HomeforGoodcv.org)

**Questions and Information**

For any other questions or more information please contact:

Merlecia Shell, HMIS Administrator Phone : 706-327-3255 Email: mshell@unitedwayofthecv.org

**Changes to Privacy Policy**

Home for Good may revise its privacy policy at any time. Please visit Home for Good’s website periodically to review our current policy.