

HMIS Privacy & Security Notice

This notice tells you about how Fraser, Ltd. uses and discloses your “protected personal information” or “PPI”. It tells you about your rights and our responsibilities to protect the privacy of your PPI. It also tells you how to notify us if you believe that we have violated any of your rights or any of our responsibilities. We must follow the terms of this notice that are currently in effect.

We are required by law to maintain the privacy of your PPI. We may use or disclose your information to provide you with services, and to comply with legal and other obligations. By requesting services from us and providing us with personal information, 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.

This notice is not a legal contract. We reserve the right to change this notice at any time. If this notice is changed, a copy of the revised notice will be available upon request and posted on our website. An amendment to this notice will be effective with respect to all information processed before the amendment, unless otherwise stated.

You may request a copy of our notice at any time. For more information about our privacy practices, or for additional copies of this notice, please contact us using the information listed at the end of this notice.

HOMELESS MANAGEMENT INFORMATION SYSTEM

The Homeless Management Information System (HMIS) was developed to meet data collection requirements 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 unhoused and to identify the need for and use of different services by those individuals and families.

In addition to collecting information to provide to HUD and comply with law, we use HMIS to provide and coordinate services you receive and carry out administrative functions related to those services, such as payment or reimbursement for services. We also produce statistical information on those who use our services and report this information through various means. More information on how Fraser, Ltd. uses information in HMIS is provided in this notice below.

USE AND SHARING OF INFORMATION ON HMIS

All information that we collect on individuals receiving services is covered by this notice. Generally, the information collected about you, such as your name and the services and referrals for services that you receive, will be entered into our HMIS systems and used only:

- For administrative and operational purposes to improve, provide, and coordinate services that can be offered you;
- For functions related to payment or reimbursement for services;
- To monitor, analyze, and evaluate program effectiveness; and
- To prepare aggregate reports and statistical information.

The information we collect and disclose includes PPI – potentially including but not limited to your name, address, social security number, or other identifying number or code, telephone number, or email address – and information describing the nature of your situation and the services and referrals you receive from us and/or participating service provider agencies. Nearly all agencies using the HMIS disclose their data to other participating agencies, although the

data that is shared can vary from agency to agency and program to program. Information may be entered or disclosed without your express consent as permitted by law.

In addition, the entities that support our use of HMIS, WellSky and Instituted for Community Alliances, may access, use, and disclose PPI to provide that support, including for client matching and claims data sharing, and to facilitate billing, payments, or claims-related activities by any insurance provider, payer, or similar third-party to Fraser, Ltd. WellSky, and/or Institute for Community Alliances also may aggregate PPI with the data of other individuals stored in HMIS for the creation and maintenance of client records.

Certain minimum client information is shared throughout HMIS in order to avoid creating duplicate client records. Authorized persons at participating community agencies will be able to see the following data elements of all client records:

- First and Last Name
- Gender
- Social Security Number (required for specific services)
- Name Data Quality
- Veteran Status
- Alias
- Age
- SSN Data Quality

Fraser, Ltd. will use and disclose your personal information for the purposes described here and for other compatible uses and disclosures:

1. To plan, provide, or coordinate services across multiple agencies.
2. To locate other programs that may be able to assist you.
3. For functions related to payment or reimbursement for services.
4. To carry out administrative functions including, but not limited to legal, audit, personnel, planning, analysis, reporting, oversight, or management functions.
5. Contractual research where privacy conditions are met.
6. Where a disclosure is permitted by law and the 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 our staff or a crime on our premises, or to avert a serious threat to health or safety, including a person's attempt to harm themselves.
7. To comply with legal reporting obligations.
8. In connection with a court order, warrant, subpoena or other court proceeding where disclosure is required.
9. When you otherwise consent to or authorize the disclosure.

When we prepare reports and statistical information or disclose information from HMIS to other parties for research or evaluation purposes, we "de-identify" the information before we disclose it. "De-identifying" information means that we remove your PPI from it so that the disclosed information can't be used to identify you.

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.

CONFIDENTIALITY RIGHTS

The privacy and confidentiality practices described in this notice govern our use of information in HMIS and were approved by our Continuum of Care Board, the responsible decision-making bodies for the homeless services system. These practices follow all HUD confidentiality regulations that are applicable to Fraser, Ltd., including but not limited to those covering programs that receive funding for homeless services from HUD or another third party. Separate privacy and security regulations apply to protected health information subject to the Health Insurance Portability and Accountability Act (HIPPA).

Every person and agency that is authorized to read or enter information into the database has been trained in client confidentiality policies and has signed an agreement to maintain the security and confidentiality of the information. Any person or agency that is found to violate their agreement may have their access rights ended and may be subject to further penalties.

YOUR INFORMATION RIGHTS

As an individual receiving services from Fraser, Ltd., you have the following rights:

1. Access to your record. You have the right to review and copy your HMIS record. At your request, we will assist in viewing the record within five working days. If we deny your request for access, you will be provided written documentation regarding your request and the reason for denial. A copy of that documentation will also be included in your services record.
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. If we deny your request for correction, you will be provided written documentation regarding your request and the reason for denial. A copy of that documentation will also be included in your services record.
3. Refusal. In general, services will not be denied should you choose not to share your information, In certain circumstances, the ability to provide some services depends on having certain PPI and therefore, we may have to decline or delay providing you with services if you do not disclose the information needed for those services.
4. Agency's Right to Refuse Inspection of an Individual Record. Fraser, Ltd. and their providers may deny you the right to inspect or copy your PPI for the following reasons:
 - Information is compiled in reasonable anticipation of litigation or comparable proceedings;
 - Information about another individual other than our staff would be disclosed;
 - Information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the source of the information; or
 - Information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.
5. Harassment. We reserve the right to reject repeated or harassing requests for access or correction to your HMIS record.
6. Grievance. You have the right to be heard if you feel that your confidentiality rights have been violated, if you have been denied access to your HMIS records, or if you have been put at personal risk, or harmed. Fraser, Ltd. have established a formal grievance process for you to use in such a circumstance. To file a complaint or grievance, contact us using the information at the end of this notice.

HOW YOUR INFORMATION WILL BE KEPT SECURE

Protecting the safety and privacy of individuals receiving services and the confidentiality of their records is of paramount importance to us. Through training, policies, procedures, and software, we have taken the following steps to make sure your PPI is kept safe and secure:

1. In the information systems we use, we have used and will maintain appropriate technical and organizational measures to protect PPI against unauthorized access, accidental or unlawful destruction, loss, alteration, and unauthorized disclosure.
2. Only trained and authorized individuals will enter or view your PPI
3. Your name and other PPI will not be contained in HMIS reports that are issued to non-funder local, state, or national agencies that do not have access to HMIS.
4. Employees receive training in privacy protection and agree to follow strict confidentiality standards before using the system.
5. In addition to WellSky and Institute for Community Alliances, System Administrators that we employ support the operation of the database. Administration of the database is governed by agreements that limit the use of PPI to the purposes specified in this notice. These agreements further insure the confidentiality of your PPI.

BENEFITS OF INFORMATION COLLECTION AND SHARING

Information you provide that is entered into HMIS can play an important role in our ability and the ability of other agencies to continue providing the services that you and others in the community are requesting. Disclosing information within HMIS to other participating agencies enables better coordination of services across those agencies and can help you to access services faster.

Data collection and sharing also helps to improve our collective understanding of the number of individuals who need services in the community and the types of services needed by different groups of people. This in turn allows us to:

1. Better demonstrate the need for services and the specific types of assistance needed in our area.
2. Make more services available to meet community needs.
3. Plan, improve, and deliver quality services.
4. Keep required statistics for state and federal funders, such as HUD.

COMPLIANCE WITH OTHER LAWS

Fraser, Ltd. complies with all other federal, state, and local laws regarding privacy rights. Consult with an attorney if you have questions regarding these rights.

PRIVACY NOTICE AMENDMENTS

The policies covered under this Privacy and Security Notice may be amended over time and those amendments will affect information we obtained before the date of the change. All amendments to the Privacy and Security Notice must be consistent with the requirements of the federal standards that protect the privacy of consumers and guide HMIS implementation and operation.

WEBSITE

We maintain a copy of this Privacy and Security Notice on our website at <https://fraserltd/youth/HMIS Privacy & Security Notice>

CONTACT INFORMATION

Use the contact information below to ask questions about this Notice, request more information, or submit a complaint:

Fraser, Ltd.'s HMIS Security Officer: Transitional Youth Services Administrator: 701-232-3301