



Homeless Management Information System (HMIS) Privacy Plan / Privacy Notice

PRIVACY NOTICE

We collect personal information directly from you for reasons that are discussed in this privacy notice. The information you provide is entered into the information management system on a web-based computer program. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs and to improve services. We only collect information that we consider to be appropriate. The collection and use of all personal information is guided by strict standards of confidentiality.

Please review this carefully. This notice tells you about how we use and disclose your personal information. It tells you about your rights and our responsibilities to protect the privacy of your personal information. It also tells you how to notify us if you believe that we have violated any of your rights or any of our responsibilities.

If you have difficulty reading this notice, please ask for assistance.

Our Legal Duty

We are required by applicable federal and state law to maintain the privacy of your personal information. We are also required to offer you a copy upon request of this notice about our privacy practices (policies), our legal duties, and your rights concerning your personal information. We must follow the privacy practices (policies) that are described in this notice while it is in effect. This notice takes effect immediately and will remain in effect until we replace it.

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

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

How We Use or Disclose Your Personal Information

When you request or receive services from this program, we ask for information about you. This information helps us continuously improve services to you by:

- Better assessing your needs
- Identifying what services are available and what services need to be developed
- Tracking whether needs are met

Your Rights

You have the right not to provide protected personal information to an agency. You may exercise your right of privacy by not answering any or all the personal questions asked by the agency. You will not be denied services for which you would otherwise have been eligible if you choose not to answer questions regarding your protected personal information.

You have the right to inspect and obtain a copy of your own protected personal information for as long as it is kept in HMIS.

You have the right to request corrections to your protected personal information when the information in the record is inaccurate or incomplete.

You have a right to request that your personal information be provided to you by alternative means, (such as by mail or telephone), or at alternative locations (such as at your residence or place of work). This agency will accommodate reasonable requests.

HOW WE PROTECT YOUR INFORMATION

Our agency and all agencies in the system are required by law to maintain the privacy of protected personal information and to provide you with notice of their legal duties and privacy practices (policies) with respect to protected personal information.

HMIS uses many security protections to ensure the safety and confidentiality of your information. Some of the information that we may collect from you includes:

- Reasons for homelessness
- Medical and mental health conditions
- Housing information
- People included in your household
- Income levels and sources
- You or your family’s needs
- Services that are being used by you and your family
- Information that is used to identify you, like your name and date of birth

NON-PERMITTED USES AND DISCLOSURES

Once entered into HMIS, your personal information that identifies you is NOT shared outside of this program without your written permission unless such information is categorized below as

permitted use or disclosure. If you would like your information shared with one or more other agencies to make it faster and easier for you to receive benefits or services, please ask us how to fill out the permission form. In the future, if you decide that you no longer want your information shared in this way, you may cancel the permission form by giving us a written statement of your decision. If you have difficulty writing, please ask for assistance.

PERMITTED USES AND DISCLOSURES: Information that you provide may be used in the following ways and otherwise as required by law without your written permission. It may be used or disclosed:

To Provide Services

We will use personal information about you to provide you with services. We may share this information with members of our staff or with others involved in your support.

For Billing or Reimbursements of Services

We may share your personal information with authorized people who work in this agency for purposes related to billing, reimbursement of services or funding.

For Administrative Operations

We may use or disclose your personal information for operational and administrative purposes. For example, there are some services that are provided for us by our business associates such as accountants, consultants, and attorneys. We may also use your personal information to evaluate our services, including the performance of our staff in caring for you.

For Creating De-Identified Information

We may use your personal information to create and disclose reports that do not identify you. For example, we may create reports for the community that can help us learn how to continually improve the quality and effectiveness of the services to people who are homeless.

As Required by Law – We may use or disclose personal information about you when we are required to do so by law.

For Public Health Activities – We may disclose personal information about you if a user or administrator, in good faith, believes that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public and is made to a person or persons reasonably able to prevent or lessen the threat, including the target of the threat.

For Victims of Abuse, Neglect or Domestic Violence – We may disclose personal information about you to a government agency (including a social service or protective services agency)

authorized by law to receive reports of abuse neglect or domestic violence if we believe you are the victim of abuse, neglect or domestic violence.

For Academic Research Purposes - We may use or disclose personal information to individuals performing academic research who have a written formal relationship. However, your protected personal information will never be published in any identifiable form.

For Legal Activities – We may disclose personal information about you in response to a court proceeding. We may also disclose personal information about you in response to a subpoena or other legal process.

Disclosures for Law Enforcement Purposes – We may disclose personal information about you to law enforcement officials for law enforcement purposes as required by law or in response to a court order, subpoena, or other legal proceeding.

OKLAHOMA PRIVACY NOTICE / FULL PUBLIC PRIVACY SCRIPT

This agency collects information about people who ask about our homeless services. When we meet with you, we will ask you for information about you and your family. We will put the information you give us into a computer program called the Oklahoma Statewide Homeless Management Information System.

We collect personal information directly from you for reasons that are discussed in our Privacy Policy Statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve the services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate. In order to provide or coordinate services, we share your information with other organizations that use the Oklahoma Homeless Management Information System. These organizations are required to have privacy policies in place to protect your personal information. You can refuse to answer any question at any time. You will never be denied help because you didn't answer a question, unless we need that answer to know if you are eligible for a service. The collection and use of all personal information is guided by strict standards of confidentiality as outlined in our Privacy Policy Statement. A copy of our agency's Privacy Policy Statement is available upon request for your review.

Public Notice

Anuncio Público

If you have difficulty reading this notice, please ask for assistance.

Por favor infórmenos si usted tiene dificultad leyendo este anuncio.

This notice describes how information about you may be collected and used.

Este anuncio describe como recolectamos y usamos su información personal

We collect personal information directly from you for reasons that are discussed in this privacy notice. The information you provide is entered into the information management system on a web-based computer program. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs and to improve services. We only collect information that we consider to be appropriate. The collection and use of all personal information is guided by strict standards of confidentiality. A copy of our Privacy Notice describing our privacy practice is available upon request.

Public Notice (Federal Register / Vol. 69, No. 146 / Friday, July 30, 2004, March 2010 and 2014 HMIS Data Manual)

Nosotros le preguntamos información personal por razones que explicamos a continuación. La información que usted provee se entra en el sistema de manejo de información, el cual es un programa computarizado alojado en el Internet. Algunas leyes, así como organizaciones que donan dinero para operar este programa, requieren que nosotros recolectemos información personal. Alguna de la información personal que recolectamos es necesaria para el manejo de nuestros programas y para mejorar el servicio que prestamos. Nosotros solamente preguntamos por información que consideramos necesaria. La recolección y el uso de información personal están regulados por normas de confidencialidad muy estrictas. Usted puede solicitar una copia de nuestro Anuncio de Privacidad, el cual describe la manera como manejamos la información privada.

Anuncio Público (Registro Federal / Vol. 69, No. 146 / Viernes 30 de julio de 2004, En marzo de 2010 y 2014 Manual de datos de HMIS)

How to File a Grievance about our Privacy Practices (Policies)

If you have concerns about any of these possible uses or disclosures or believe that such disclosures may put you or someone else at risk, please let us know so that we can address these concerns with you. We want you to be confident that your information is secure. If you believe your information has been shared without your permission, please write down your concern and submit it to us at:

Community Development Support Association, Inc.
Attn: Executive Director
114 South Independence Avenue
Enid, Oklahoma 73701

You may use the form on the following form to submit a grievance to us. **It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.**

Grievance about our Privacy Practices (Policies)

If you think we may have violated your privacy rights, or you disagree with a decision we made about access to your “Personal Information” you may complete this form.

And return this form to:

Community Development Support Association, Inc.
Attn: Executive Director
114 South Independence Avenue
Enid, Oklahoma 73701

Date of offense: _____

Name of individual who violated your privacy rights: _____

Brief description of grievance (what happened): _____

Best way to contact you: _____

Your Name: _____

Your Phone Number: _____

Your mailing address: _____

It is against the law for any agency to take retaliatory action against you if you file this grievance. You can expect a response within 30 days via the method of your choice.

This section below for agency use only.

Reviewed by: Name: _____ Signature: _____

Title: _____ Date: _____

Recommendation or corrective action taken: