

# Napa County Continuum of Care HMIS Privacy Policy Notice



## What is HMIS?

\_\_\_\_\_ participates in a county-wide project called the Homeless Management

(Write Your Agency Name in this Space)

Information System (HMIS), which collects information on people who are homeless or at risk of homelessness. HMIS is administered by the Napa County Continuum of Care. We enter the information into a secure computerized database for storage and analysis. All persons having access to HMIS information have agreed to keep the information strictly confidential.

## What is the Napa County Continuum of Care?

The Continuum of Care is a collection of agencies in the County who provide services to benefit homeless persons. As of the date of this policy, the following Agencies/Programs are members who participate in HMIS can be found here: <https://napa.bitfocus.com/napa-about-hmis>.

## Personal Identifying Information:

There are four items of information about you that are known as “personally identifying information” (PII); they are your name, social security number, date of birth and gender. In California, information about your medical status, medications, any disabilities and your domestic violence status is also protected. We use these items of information to uniquely identify you from everyone else in our system. These items of PII are never included in information sent to the federal, state or other government agencies.

## Sharing your information:

You do not have to provide permission to share personally identifying information and other information for use in HMIS. However; you may be required to provide personal identifying information to prove your eligibility for a program or service. You will receive services from us whether or not you agree to provide permission to share personal identifying information and other information for use in HMIS. However, your cooperation in providing permission to share your information will assist us and other agencies in our Continuum of Care to provide services and housing to you and others more effectively. Under California Law we never share information about your medical status, medications, disability status or domestic violence status. **We are required to report in HMIS that you received services whether or not you provide permission to share personal identifying information and other information.**

## Why is information collected for HMIS?

Information collected in HMIS will help the Napa County Continuum of Care and other participating agencies who provide services to the homeless better understand what types of services you need, assess what services are available to you, develop new services, monitor whether your needs are being met, and improve the quality of care and services for homeless individuals and families. It will also help the Napa County Continuum of Care and other participating agencies understand the extent, nature, and causes of homelessness in Napa County. We also collect information that is required by law or by organizations that fund programs within HMIS.

## How will information you give us be used and disclosed?

Information you consent to give to us for use in HMIS will be used in the following ways:

- By the Continuum of Care, to administer the HMIS, to ensure the data in the system is accurate and valid, to fix problems in the computer system, and to test the system;
- By the Continuum of Care, to prepare reports that contain “de-identified” information for the purpose of sharing data and preparing reports for HMIS users, government agencies and policy-makers, and the public generally. “De-identified” means that your name, social security number, address, zip code, or any other information that could be used to identify

you personally will **not** appear in any of the data or reports released by an HMIS user or Administrator

- By agencies participating in HMIS, this will allow those agencies to more effectively provide and coordinate services for you.

In addition to the uses above, we may also use and disclose information you provide us in the following ways:

- For functions related to payment or reimbursement for services;
- To carry out internal administrative functions;
- To create “de-identified” statistical reports;
- To report abuse, neglect, or domestic violence, but only to the extent that such reports are required by law;
- To prevent or lessen a serious and imminent threat to the health or safety of a person or the public, including the target of a threat, if permitted by applicable law;
- In response to a warrant, subpoena, summons, or lawful court order, or in response to a written or oral requests by a law enforcement official under certain circumstances;
- To a law enforcement official, if we, in good faith believe a crime has occurred on our premises;
- To an individual or institution for academic research purposes;
- To authorized federal officials in order to conduct certain national security activities or other activities associated with the protection of certain officials.

### **What rights do you have regarding your information?**

You have the right to see and receive a copy of the information that we maintain about you, except for information compiled in anticipation of litigation, information about another individual, information obtained under a promise of confidentiality, or information that would, if disclosed, endanger the life or safety of yourself or others. We will consider changing any information about you if you believe the information in our records is inaccurate.

### **What should you do if you think your privacy rights have been violated?**

We take your privacy rights seriously. If you believe that your privacy rights have been violated, you may send a written complaint to this Agency or to the HMIS Administrator at the address listed below. This Agency and the Continuum of Care are prohibited from retaliating against you for filing a complaint.

### **Can this notice change in the future?**

We and the Continuum of Care may amend this Notice at any time, and the amendment may affect information obtained by us before the change. The revised Notice will be posted on the Napa County website [www.napacounty.gov/288](http://www.napacounty.gov/288) at all times or may be obtained by contacting the Agency in writing and asking for a copy of any new Notice.

If you have further questions about the notice or about your rights, please contact this Agency or the Napa County (HHSA) HMIS Administrator. Please note, however, that the Agency and Napa County (HHSA) cannot give legal advice to you regarding your rights.

Agency Name: _____	HMIS Administrator
Agency Address: _____	Napa County Housing & Community Services
_____	2751 Napa Valley Corporate Dr., Bldg. B
Agency Phone Number: _____	Napa, CA 94558
	707-259-8243