HMIS Notice of Privacy Practices

Effective 7/1/24

THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN ACCESS THIS INFORMATION.

People's Resource Center and the Northeast Illinois Homeless Management Information System (HMIS)

Overview

When you request services from People's Resource Center, information about you and members of your family is entered into a computer system called HMIS, or Homeless Management Information System. HMIS is a project of DuPage County Community Services in partnership with many organizations in northeast Illinois that provide homeless, health care, medical, and social services to persons and families in need. The information collected in HMIS will help us coordinate and provide better service, document the need for additional services, and generate reports such as the number of persons who are homeless or at risk of homelessness in northeast Illinois.

We intend our policy and practices to align with the Housing and Urban Development's (HUD) HMIS Data and Technical Standards and HMIS Data Standards[1].

What is Being Shared

This agency's staff and the Software Administrators have access to all data collected in HMIS, and the participating agencies have limited access as described below and online, dupagehomeless.org/HMIS/Forms. If further information is to be shared and is not covered by this notice, then a separate authorization will be required.

Information shared to participating agencies include:

- Protected Personal information (PPI) - Name, Date of Birth, and Social Security Number. PPI is information that allows identification of an individual directly or indirectly, can be manipulated by a reasonably foreseeable method to identify a specific individual, or can be linked with other available information to identify a specific client.
- Demographics – Race, Ethnicity, Gender, Veteran Status
- Project Enrollments – Project Name, Enrollment dates, Reason for Leaving a program, and the Housing Destination you left to.
- Case Manager's contact information (if one is assigned)

How Your Information May Be Used

Unless restricted by law, the information can be used by:

- Authorized people who work in People's Resource Center, HMIS partner organizations for administrative purposes related to providing and coordinating services to you or your family, or

[1] https://www.hudexchange.info/programs/hmis/

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for billing or funding purposes.

- Auditors or others who review the work of People's Resource Center or need to review the information to provide services to People's Resource Center.
- The HMIS system administrator(s), DuPage County Community Services and its designees, and the HMIS developer (WellSky) for administrative purposes (for example, to assist People's Resource Center by checking for data errors and identifying your potential eligibility for services).
- Individuals performing academic research who have signed a research agreement with People's Resource Center or DuPage County Community Services. Your name, social security number or other identifying information may be used to match records but will not be used directly in the research unless you sign a separate consent.
- People's Resource Center or the DuPage County Community Services may use your information to create aggregate data that has your identifying information removed. Also, People's Resource Center may disclose to a third-party aggregate data so that the third party can create data that does not include any of your identifying information.
- Government or social services agencies that are authorized to receive reports of homelessness, abuse, neglect, or domestic violence, when such reports are required by law or standards of ethical conduct.
- A coroner or medical examiner or funeral director to carry out their duties.
- Authorized federal officials for the conduct of certain national security or certain activities associated with the protection of certain officials.
- Law enforcement officials, but the disclosure must meet the minimum standards necessary for the immediate purpose and not disclose information about other individuals. A court order or search warrant may be required.
- Others, to the extent that the law requires a specific use or disclosure of information. Information may be released to prevent or lessen a serious and imminent threat to the health or safety of a person or the public; if the disclosure is made to a person or persons reasonably able to prevent or lessen the threat or harm, including the target of a threat.

Other uses and sharing of your information will be made *only with your written consent*.

Your Rights Regarding Your Information in HMIS

- You have the right to opt-out of having your and your household members' information shared to partnering agencies in the Northeast Illinois Homeless Management Information System (HMIS). To do so, you must request and sign the "Request to Not Share Information in HMIS." Any information in the HMIS prior to signing the form will continue to be shared with the agencies as described in this notice.

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- You may request a list of current HMIS partner organizations from People's Resource Center, DuPage County Community Services, or review the current list at suburbancook.org/hmis. Northeast Illinois HMIS may add new HMIS partner organizations to this list at any time.
- You have the right to inspect and obtain a copy of your own protected personal information for as long as it is kept in the HMIS, except for information compiled in reasonable anticipation of, or for use in, a legal proceeding.
- You have the right to request a correction of your protected personal information when the information in the record is inaccurate or incomplete.

Enforcement of Your Rights

If you believe your privacy rights have been violated, you may send a written complaint to People's Resource Center. If your complaint is not resolved to your satisfaction, you may send your written complaint to DuPage County Community Services. Addresses are listed at the end of this Notice. You will not be retaliated against for filing a complaint.

People's Resource Center is required by law to maintain the privacy of your protected personal information, and to display a copy of the most recent Notice. People's Resource Center reserves the right to change the Notice from time to time, and if it does, the change will affect all the information in the HMIS, not just the information entered after the change. The revised Notice will be posted at [Agency Website]. You may request a copy of it from People's Resource Center.

People's Resource Center

201 S. Naperville Road

Wheaton, IL 60187

630-682-5402

www.peoplesrc.org

DuPage County Community Services

HMIS System Administrator

421 N County Farm Road

Wheaton, IL 60187

630-407-6397

dupagehomeless.org/HMIS

Change History

- October 2009- Initial Policy was a part of client consent documents.
- October 2012 - Adopted HUD's baseline privacy notice and detailed our implied consent disclosure process.
- October 2014 – Updated HUD's baseline privacy notice to include Suburban Cook County, address the name change of DuPage County HMIS to Northeast Illinois HMIS, and reflect the changes to the list of shared data elements.

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- June 2021 – Complete reorganization, re-formatting, deduplication of statements, and adjusted level of language used. Added language around sharing of pre-existing data after a client refuses to share any new information. Moved to using Effective date rather than version numbers.
- April 2022 – Updated websites.
- January 2024 – Updated name of the form used to opt out of sharing information in HMIS. Added the name of the regional HMIS implementation, Northeast Illinois.