# Oregon Muli-Continuum

## Notice to Clients of Uses & Disclosures

## Privacy Notice to Clients

This notice tells you about how we use and disclose your private personal information. It tells you about your rights and our responsibilities to protect the privacy of your private 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.

We are required by law to maintain the privacy of your private personal information. We must follow the terms of this notice that are currently in effect.

We reserve the right to change this Notice at any time. This Notice is not a legal contract. If this notice is changed, a copy of the revised notice will be available upon request or posted on our website.

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.

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We will enter the information you provide our agency into a computerized record-keeping system called ServicePoint. Several local agencies take part in this implementation of ServicePoint™ to better organize and deliver services to homeless or near homeless individuals and families.

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

- First Name
- Last Name
- Veteran Status
- Gender
- Date of Birth
- Social Security Number (required for specific services)

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Our goal is to improve efforts to work together to understand and end homelessness. Information you provide will play an important role, including:

- Helping us prioritize, plan, and provide meaningful services to you and your family;
- Assisting our agency to improve its work with families and individuals that are homeless;
- Allowing local agencies to work better together to end homelessness;
- Providing statistics for local, state, and national policy makers to set effective goals.

**How your personal information may be used**

- Information you provide and services you receive will be entered into ServicePoint.
- Information you provide will be used for administrative and operational purposes to improve, provide and coordinate services that can be offered you.
- Information you provide will be used for functions related to payment or reimbursement for services.
- Information you provide will be used to monitor program effectiveness.
- Information you provide will be used to prepare aggregate reports and statistical information without personal identifying information.

- Information you provide concerning substance abuse, mental health, HIV, and domestic violence will not be shared with OMC CMIS/HMIS Partner agencies, unless specifically authorized by you.
- ~Any other Personal identifying information will not be disclosed to any third-party, unless authorized by you or required by law.
    - Authorization not required for certain disclosures to government agencies or legal processes
        - Uses and disclosures required by law
        - Public health, health oversight and regulatory agency activities
        - Cases of neglect, abuse or domestic violence
        - Judicial and administrative proceedings
        - Law enforcement investigations
        - Deceased individuals and organ donors
        - Serious threats to health or safety
        - Disclosure of “de-identified” health information

**How will my information be kept secure?**

- The computer program we use has the highest degree of security protection available.
- Persons with access to ServicePoint data shall not issue reports containing personal identifying information.
- OMC CMIS/HMIS is governed by federal, state, county, city and local privacy policies. System-wide access to personally identifying information contained in ServicePoint shall be limited System Administrators. System Administrators have been screened and are employed by a lead organization and have an Intergovernmental Agreement in place.
- ~Personal identifying information, like your name or birth date, may be viewed by people working to provide services to you, other local agencies providing services, select community service providers when appropriate or by administrators providing technical assistance. Personal identifying information will be removed before reports are issued to local, state, or national agencies.
- All ServicePoint users receive training in privacy protection and have received copies of this privacy policy and have signed a confidentiality agreement pledging to adhere to its requirements.

# Oregon Multi-Continuum
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**Know your information rights!**

As a Client receiving services from a OMC CMIS/HMIS Participating agency, you have the following rights:

1. Determine the level of disclosure of your information; allow or refuse to share your information with OMC CMIS/HMIS participating agencies.
2. May terminate the Release of Information at any time, by providing this service provider written notice.
3. Right to request entrance into the database as an anonymous client or a restricted client.
4. Are entitled to a copy of this notice.
5. Reasonable accommodation. The agency you are seeking services from must make reasonable accommodations to ensure that you understand your information rights.
6. Access to your record. You have the right to review your ServicePoint record, obtain a printed copy of your data, and have information that you do not understand explained to you.
7. Correction of your record. You have the right to have your record corrected so that information is up-to-date, accurate, and to ensure fairness in its use. Disagreements over the accuracy of information shall be subject to the agency grievance process and any uncorrected disagreement shall be noted in your ServicePoint record.
8. Refusal**.** You will not be denied services for which you are otherwise eligible if you refuse to consent to the sharing with other provider agencies of data that has been entered into ServicePoint. If you have safety concerns, please discuss this with a staff member.
9. Grievance: You have the right to be heard if you feel that you have been unjustly served, put at personal risk, or harmed. Employees or agencies that misuse information are subject to reprimands, warnings, and dismissal from the OMC CMIS/HMIS. The agency must make their written grievance policy available to you.
10. Data Archival: All personally identifying data will be archived from ServicePoint no later than seven years after being entered or after last being modified.
11. Amendments: The terms of this privacy notice may be amended at any time and all amendments will be effective with respect to previously obtained information.
12. Privacy Policy Questions & Complaints: All questions or complaints regarding this agency's privacy and data security practices may be pursued through the agency grievance process.

**OHCS CMIS/HMIS System Administrator**
Hunter Belgard
Oregon Housing and Community Services
4725 Summer St NE, Suite B
Salem, OR 97301
503-507-8233
Hunter.BELGARD@hcs.oregon.gov

# Central Oregon Continuum of Care

## Notice to Clients of Uses & Disclosures

## Privacy Notice to Clients

REVISION HISTORY

| Version | Date | Description | Author |
|---|---|---|---|
| N/A | Original | Original | W. Smith |
| 0.1 | 01/12/2011 | New Format; added: "Authorization not required"< for certain disclosures to government agencies or legal processes information>.<br>Community Review/Input 09/23/2010<br>Legal Review 12/28/2010 | W. Smith |
| 0.2 | 10/13/2011 | Remove Specific County references.<br>Allow for expanded visibility of Personally identifying information; select community service providers when appropriate | W. Smith |
| 0.3 | 09/06/2017 | Added: ~Certain minimum client information is shared…<br>Updated related information marked with ~ | W. Smith |
| 0.4 | 07/01/2022 | Updated Vendor Name and System Administration to OHCS | C. Rodgers |
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