

# Homes with Hope, Inc.

## Privacy Policy

### Summary

This Privacy Policy, effective April 1, 2006, and amended on June 1, 2011 describes the privacy policy of Homes with Hope, Inc. (HwH) f/k/a the Interfaith Housing Association. HwH may amend this policy at any time. HwH collects personal information only when appropriate and may use or disclose your information to provide you with services. HwH may also use or disclose it to comply with legal and other obligations. As a client of HwH it is understood that you agree to allow HwH to collect information and to use or disclose it as described in this notice. You can inspect any personal information about you that we maintain. You can also ask us to correct inaccurate or incomplete information. You can ask HwH for further information on the agency's privacy policy or practices. HwH will respond to all questions and complaints. The Full Notice, written below, provides further information on HwH's Privacy Policy. A copy of the full notice is available upon request.

### Full Notice

This Privacy Policy describes the privacy policy and practices of Homes with Hope, Inc.'s, whose main office is located at:

49 Richmondville Avenue, Suite 112  
Westport, CT 06880-2053  
203-226-3426  
203-226-2557 fax  
[www.hwhct.org](http://www.hwhct.org)

The policy and practices in this notice cover the processing of protected personal information for clients of Homes with Hope, Inc. Protected Personal Information (PPI) is any information HwH maintains about a client 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.

HwH has adopted this policy in response to the standards for Homeless Management Information Systems (HMIS) issued by the Department of Housing and Urban Development. HwH intends their policy and practices to be consistent with those standards. See 69 Federal Register 45888 (July 30, 2004). This notice is designed to

inform all HwH clients, staff, and others how protected personal information is processed at HwH. HwH follows all policies and practices described in this notice.

All personal information that HwH maintains is covered by the policy and practices described in this Privacy Policy. HwH will collect a client's unique identifying information that includes but is not limited to social security number, date of birth, and gender. From time to time information regarding a client's entitlements; medical, psychological and substance abuse referrals; job training and employment will be captured. When applicable, family members who are staying in an HwH facility will have their unique identifying information collected.

HwH may amend this notice and change our policy or practices at any time. Amendments may affect personal information that HwH obtained before the effective date of the amendment. A written copy of the amended version of the Privacy Policy will be provided to any individual who requests it. The amended version will also be posted on the HwH website. HwH maintains a current copy of this policy on their website at [www.hwhct.org](http://www.hwhct.org).

### **How and Why Private Personal Information is Collected**

HwH collects personal information only when appropriate to provide services or for other specific purposes of the agency or when required by law. HwH collects private personal information for the following reasons:

- To provide or coordinate services to clients;
- To locate other programs that may be able to assist clients;
- For functions related to payment or reimbursement from others for services that we provide;
- To operate our organization, including administrative functions such as legal, audits, personnel, oversight, and management functions;
- To comply with government reporting obligations or
- When required by law.

HwH will only use lawful and fair means to collect personal information. The agency will only collect personal information with the knowledge or consent of its clients. If you seek HwH's assistance and provide HwH with personal information, it is understood that you consent to the collection of said information as described in this notice. HwH may also get information about you from:

- Individuals who are with you;
- Other private organizations that provide services such as Hall-Brooke Hospital and Positive Directions;

- Government agencies such as the CT Dept. of Social Services and the Westport Dept. of Human Services; or
- Telephone directories and other published sources.

HwH has a sign posted at each intake desk explaining the agency's personal information data collection rationale. Collection of personal information is done for the following reasons:

- As required by law or by organizations that fund the agency money to operate the program;
- As a tool to better run the agency's programs;
- To improve services for homeless individuals, and
- To better understand the needs of homeless individuals.

HwH only collects information that is considered to be appropriate.

## Use of Disclosed Personal Information

HwH may or may not use or disclose your personal information. HwH understands that you consent to the use or disclosure of your personal information for the purposes described here and for other uses and disclosures that we determine to be compatible with these uses or disclosures:

- To provide or coordinate services to individuals;
- For functions related to payment or reimbursement for services;
- To carry out administrative functions such as legal, audits, personnel, oversight, and management functions;
- When required by law to the extent that use or disclosure complies with and is limited to the requirements of the law;
- To avert a serious threat to health or safety if:
  - HwH believes that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
  - Use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.
- To report about an individual HwH reasonably believes to be a victim of abuse, neglect or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence under any of these circumstances:
  - Where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law,
  - If the individual agrees to the disclosure, or
  - To the extent that the disclosure is expressly authorized by statute or regulation, and
    - we believe the disclosure is necessary to prevent serious harm to the individual or other potential victims, or
    - if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure and
  - When we make a permitted disclosure about a victim of abuse, neglect or domestic violence, HwH will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:

- HwH, in the exercise of professional judgment, believes informing the individual would place the individual at risk of serious harm, or
  - HwH would be informing a personal representative (such as a family member or friend), and HwH reasonably believes the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interests of the individual as HwH determines in the exercise of professional judgment.
- To a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under any of these circumstances,
- In response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena,
- If the law enforcement official makes a written request for PPI that:
  - is signed by a supervisory official of the law enforcement agency seeking the PPI states that the information is relevant and material to a legitimate law enforcement investigation;
  - identifies the PPI sought;
  - is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought, and
  - states that de-identified information could not be used to accomplish the purpose of the disclosure.
- If HwH believes in good faith that the PPI constitutes evidence of criminal conduct that occurred on our premises;
- In response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, social security number, and distinguishing physical characteristics,
- If:
  - the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others), and A-29;
  - the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought. and

- to comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.

## **Inspection and Correction of Personal Information**

You may inspect and have a copy of your personal information that HwH maintains. HwH will offer to explain any information that you may not understand. HwH will consider a request from you for correction of inaccurate or incomplete personal information that HwH maintains about you. If HwH agrees that the information is inaccurate or incomplete, HwH may delete it or may choose to mark it as inaccurate or incomplete and to supplement it with additional information.

To inspect, get a copy of, or ask for correction of your information, contact the Program Director of the program in which you are staying to make the request. The following may apply to your request:

- HwH may deny your request for inspection or copying of personal information if:
  - The information was compiled in reasonable anticipation of litigation or comparable proceedings;
  - The information is about another individual (other than a health care provider or homeless provider);
  - The information was obtained under a promise or confidentiality (other than a promise from a health care provider or homeless provider) and if the disclosure would reveal the source of the information, or
  - Disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
- If HwH denies a request for access or correction, the agency will explain the reason for the denial. HwH will also include, as part of the personal information that is maintained, documentation of the request and the reason for the denial.
- HwH may reject repeated or harassing requests for access or correction.

## **Data Quality**

HwH collects only personal information that is relevant to the purposes for which the agency plans to use it. To the extent necessary for those purposes, HwH seeks to maintain only personal information that is accurate, complete, and timely. HwH is developing and implementing a plan to dispose of personal information not in current use seven years after the information was created or last changed. As an alternative to disposal, the agency may choose to remove identifiers from the information. HwH may keep information for a longer period if required to do so by statute, regulation, contract, or other requirement.

## **Complaints and Accountability**

HwH accepts and considers questions or complaints about our privacy and security policies and practices. To ask a question or make a complaint contact the Program Director of the program in which you are staying to make the request. All members of HwH's staff (including employees, volunteers, affiliates, contractors and associates) are required to comply with this privacy notice. Each staff member must receive and acknowledge receipt of a copy of this privacy notice.

## **Data Protection Policy**

Each HwH Program Director and Case Manager is responsible for the securing of any paper or other hard copy containing personal protection information that is either generated by or for HMIS, but not limited to reports, data entry forms and signed consent forms by their Program.

All paper or other hard copy generated by or for HMIS that contains PPI must be directly supervised when the hard copy is in a public area. When agency staff is not present, the information must be secured in areas that are not publicly accessible. PPI generated by HMIS must be kept in each client's personal file and stored in a locked file cabinet in the Program Director's office. Information that is generated but is not meant to be retained will be shredded immediately after use. Written information specifically pertaining to user access, e.g. username and password must not be stored or displayed in any publicly accessible location.

## **Archiving of Personal Private Information**

Client files that are deemed suitable for archiving by the Program Director will be kept in the locked storage area on the second floor of the Gillespie Center & Hoskins' Place used specifically for that purpose. Pursuant to HIPAA Privacy Rule 45 C.F.R. § 164.530(i) archived client files will be destroyed after remaining inactive for seven (7) years.