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**Standard Agency Privacy Practices Notice**

Version 1.3, Adopted 10/03/2014

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**THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.**

*If you have questions about this notice, or need additional information, please contact the person(s) listed below:*

Agency Information (hereinafter “this agency”)

HMIS Lead Agency Information

Chicago Alliance to End Homelessness  
651 W. Washington, Suite  
Chicago, IL 60661  
Phone: 312-379-0301

**Chicago Homelessness Homeless Management Information System (HMIS)**

Chicago has a group of private agencies and City departments working together to prevent homelessness and provide services to homeless and formerly homeless individuals and families in Chicago. When you request services from this agency, we enter information about you and members of your family that are with you into a computer system called HMIS, or Homeless Management Information System.

HMIS is a software system administered and governed by the Chicago Planning Council on Homelessness, which is staffed by the Chicago Alliance to End Homelessness - these agencies are referred to throughout this document as the HMIS & COC Lead Agencies. HMIS is used by many agencies in Chicago that provide services to persons and families in-need. The information collected in HMIS will help us improve service delivery, better understand homelessness, and evaluate the effectiveness of our services.

**Your benefits for providing information**

HMIS is a citywide information system, and we may be able to reduce the amount of information we have to ask you if you have already provided it to another agency that uses HMIS. We can also use your information to more quickly help you find the services you need and to determine whether or not you are eligible for them. We use HMIS to reduce the amount of time we spend preparing reports to organizations that fund our programs, allowing us to provide more services to you.

**Your options for providing information**

Your information will be entered into a citywide database used by homeless providers. Authorized individuals at agencies may have access to your information for the uses described in this Notice.

This agency shares information with other homeless agencies that use HMIS and **your personal identifiers will be disclosed to other agencies that use HMIS so they can easily locate your record if you seek services from them.** Your personal identifiers are listed in the section below. **You may request that this information is not shared.**

**How your information in the HMIS may be used**

Agencies that use HMIS share basic information with other agencies, such as Name, Social Security number, Date of Birth, Gender and Veteran Status. Unless restricted by law or by the person who contributes that personal information, HMIS client data may be used or disclosed for (1) case management, (2) administrative, (3) billing, (4) analytical, and (5) other purposes as permitted or required by law or authorized by you. Uses involve sharing parts of client information with persons within an agency. Disclosures involve sharing parts of client information with persons or organizations outside of an agency.

- **Case Management Uses and Disclosures:** Agencies may use or disclose client information for case management purposes associated with providing or coordinating services. Unless a client requests that

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his/her record remain hidden, personal identifiers will be disclosed to other HMIS agencies so other agencies can easily locate the client's record if he/she goes to them for services. Beyond personal identifiers, each agency can only disclose client information with other agencies with written client consent or other specific waiver.

- **Administrative Uses and Disclosures:** Agencies may use or disclose client information internally to carry out administrative functions, including but not limited to legal, audit, personnel, oversight and management functions. Client information will be stored on a central citywide case management database; client information will be disclosed for system administration purposes to the Lead Agency or contractors who administer the central database.
- **Billing Uses and Disclosures:** Agencies may use or disclose client information for functions related to payment or reimbursement for services. An example might include generating aggregate reports for the people and organizations that fund an agency. A client's personal information may be disclosed for billing or reimbursement purposes, if required by the funder/billing agency.
- **Analytical Uses and Disclosures:** Agencies may use client information for internal analysis. An example would be analyzing client outcomes to evaluate program effectiveness. Agencies will also disclose client personal identifiers to the central system administrators for uses related to creating an unduplicated database on clients served within the system, ultimately resulting in the creation of de-identified personal information. Agencies may also disclose portions of a client's information without the personal identifiers for analytical purposes related to analyzing client data, including but not limited to understanding trends in homelessness and needs of persons who are homeless, and assessing the implementation of Chicago's Plan to End Homelessness.
- **As Required by Law:** Agencies may disclose your personal information to comply with requirements of law.
- **To Avert a Serious Threat to Health and Safety:** Agencies may disclose your personal information if this agency believes it is necessary to prevent or lessen a serious and imminent threat to the health and safety of an individual or the public, and if that information can be disclosed to a person who is reasonably able to prevent or lessen that threat.
- **To Report Victims of Abuse, Neglect or Domestic Violence:** Agencies may disclose your information to an agency authorized by law to receive reports of abuse, neglect or domestic violence if this agency believes you are a victim of abuse, neglect or domestic violence. This agency may only disclose information in this circumstance if (1) the disclosure is required by law, (2) if you agree to the disclosure, or (3) if this agency believes the disclosure is necessary to prevent serious harm.
- **For Law Enforcement Purposes:** Agencies may disclose your information to law enforcement entities only in response to appropriate legal requests. A subpoena or court order may be required, but the disclosure must meet the minimum standards necessary for the immediate purpose and not disclose other information about the individuals.

A client record will be stored on the HMIS system with personal identifiers for a period of seven years from the time it was last modified. Beyond that point, all personally identifying information will be removed and the remaining information will only be retained in a DE identified format. Unless information is required to be shared due to agency policy or as a condition of a provider agreement, you may revoke your consent to share information with other agencies at any time in writing, except if the agency has already released information as a result of your consent.

### **Your rights regarding your information in the HMIS**

- 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 a right to have any information explained to you in detail.

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- You have the right to correct your protected personal information when the information in the record is inaccurate or incomplete.
- You have the right to request that reasonable accommodations be made to you regarding this and other HMIS data collection forms, including access to a qualified sign language interpreter, readers of materials in Braille, audio, or large type, as needed if you are an individual with a disability.

### **Exercising your rights regarding your information in the HMIS**

You can exercise these rights by making a written request to this agency, or by making a written request to the HMIS & COC Lead Agencies. The addresses are listed at the beginning of this Notice.

### **Enforcement of your privacy rights**

If you believe your privacy rights have been violated, you may send a written complaint to this agency. If your complaint is not resolved to your satisfaction, you may send your written complaint to the HMIS & COC Lead Agencies. Addresses are listed at the beginning of this Notice. You will not be retaliated against for filing a complaint.

This agency is required by law to maintain the privacy of your protected personal information, and to display a copy of the most recent Standard Agency Privacy Practices Notice.

### **Revisions to this Notice**

This Notice may be amended at any time and amendments may affect information obtained from you prior to the date of the change. An amendment will be effective to all information previously collected, unless otherwise stated. We will maintain a record of all amendments to this Notice, and can provide it upon request.