

## HMIS Client Data Privacy Guide

If a client is not willing to share their data in Clarity/HMIS, it is important to both record and/or collect documentation of those wishes. Please update the client's release of information accordingly and upload the correct documentation in Clarity/HMIS before emailing HMIS Support to request the client's record be secured. When a client declines to share their data or revokes authorization to share data, please complete the steps found below.

### Key Terms

**HMIS CIE- Multiparty Authorization-** Is a multi-party release of information that authorizes the Regional Taskforce on the Homeless, 2-1-1 San Diego, and participating agencies to collect, record, use, and share client's personally identifiable information, such as: health, finances, housing, employment, and any other relevant information. Collecting this information is essential in assessing a client's healthcare, housing, and financial situation for the purposes of client care coordination.

**Decline to Share Data-** Occurs when a client refuses to share their data when a provider initially collects a release of information (ROI). A client declines to share data by declining to sign the [HMIS-CIE-Multiparty Authorization](#). Client is declining to share data within the HMIS and HMIS data will not be shared with CIE.

**Client Revocation of Authorization-** Is a form that revokes and overrides a client's initial consent to share data in HMIS and CIE. A Revocation of Authorization to release information is necessary if a client initially consented to the MPA, but at a later date chooses to revoke their consent. The current [Client Revocation of Authorization](#) form will be a revoke to sharing data in both systems.

**HMIS Client Record De-Identification-** When a client has declined/revoked to share data in the HMIS and the client record contains data entered by more than one agency, the Client Profile will be de-identified. **De-identification** is the removal or manipulation of a client's personally identifiable information (PII) so that the client record can no longer be identifiable. After de-identification, the client record can then only be identified by a service provider who has retained the client's Unique Identifier for the purposes of continuing data entry and providing homeless services.

### How to Create or Manage an ROI entry

- 1) Track clients "**permission**" or response to signing the [HMIS-CIE-Multiparty Authorization](#).
  - "Yes"- Client has consented to shared data in HMIS and CIE
  - "No"- Client has declined to share data in HMIS or has signed the [Client Revocation of Authorization](#) form revoking prior (valid) consent that was recorded in HMIS.
- 2) **Record the Start Date-** The Start Date will be the date the client signed the [HMIS-CIE-Multiparty Authorization](#). There is no Start Date for permissions that are recorded as a "No". The "No" entry will be recorded based on the date the permission was added or changed to "No" in Clarity/HMIS.
- 3) For a Permission of "Yes" the default **End Date** is set to 7 years after the Start Date. This end date should never be less than 7 years from the Start Date. Unless otherwise revoked, to the fullest extent by law, the authorization

shall remain valid for seven year from the effective date (Start Date) indicated.

- 4) **Documentation Type-** Records what type of consent was obtained and recorded. Below are the different document types, ordered from best to less effective.
- **Attached PDF-** All clients should have consented to share data by signing the [HMIS-CIE-Multiparty Authorization](#).
  - **Signed Paper Document-** This documentation type is a temporary selection to record when an HMIS user collected a client’s signed MPA, but has not had the opportunity to scan and upload the document into Clarity/HMIS because they are in the field, etc. This document type should be switched to an Attached PDF and the signed MPA should be uploaded under the same ROI entry within 3 business days. No new ROI entry is required.
  - **Verbal Consent-** According to the HMIS Policies and Procedures only 2-1-1 San Diego HMIS users are authorized to collect verbal consent if needed. An exception to this rule only applies when the HMIS lead has enacted the [Emergency Protocol for HMIS Consent](#).
  - **Household-** To be used when a client is a minor (under the age of 18) and their parent/legal guardian has consented to share data under the [HMIS-CIE-Multiparty Authorization](#). This document should be present under the parent/legal guardian’s client record.

Example of a client who has consented to share data through the [HMIS-CIE-Multiparty Authorization](#)

RELEASE OF INFORMATION

Permission	Yes	▼
Start Date	02/24/2021	📅 25
End Date	02/24/2028	📅 25
Documentation	Attached PDF	▼
File	Select File	

HMIS-CIE-Multiparty-Authorization-Final-03162020.pdf (56.33KB) - Completed

### How to collect and record a client’s initial decline to share data in HMIS

A client should inform their provider that they currently do not wish to share their data in HMIS, CIE, or both. Please follow the steps below to properly help secure a client’s record in HMIS or CIE.

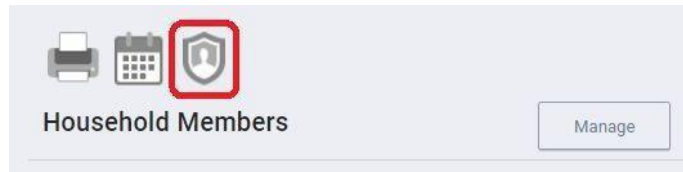
### Recording and Notifying HMIS Support of Client’s Decline to Share Data in HMIS

If this is the first time a client has been presented with the MPA and the client states they do not wish to share their data in the HMIS and with CIE, please make sure to do the following:

#### When creating a new client record

1. After adding all the UDEs on the client profile switch the ROI permission to “No” and then select add record.

## Navigate to the Privacy Shield



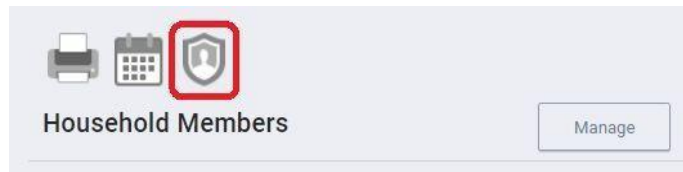
**RELEASE OF INFORMATION**

Permission No ADD RECORD CANCEL

2. Please notify HMIS support of the client's decline to share data by sending an email to [support@rtfhsd.org](mailto:support@rtfhsd.org). Please include the Client's Unique Identifier and do not include any client PII in the email.
3. If the client is an HH whose decline also covers dependent children then the same process needs to be followed under the dependent client records.

### Recording an MPA decline on an existing client record with no previous ROI entry

1. Navigate to the Privacy/ROI area of the client record by clicking on the **Privacy Shield** icon on the far right side of the Client Profile.



2. From within the Privacy area of the client record, click on the **"Add Release of Information"** button located on the right side of the Release of Information header.



3. Change the Permission field selection to “No”.
4. Click on the “Add Record” button.



RELEASE OF INFORMATION

Permission No

ADD RECORD CANCEL

5. After changing the Permission to “No”, please notify HMIS support of the client’s decline to share data by sending an email to [support@rtfhsd.org](mailto:support@rtfhsd.org). Please include the Client’s Unique Identifier and make sure to not include any client PII in the email.

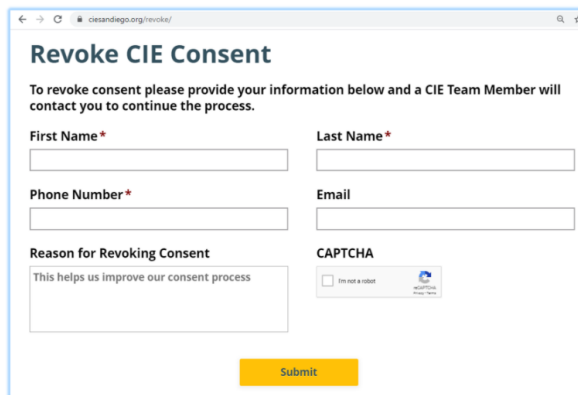
**Ex: of Unique Identifier**

UNIQUE IDENTIFIER  
F48CC705F

**Notifying CIE Helpdesk of Client’s Decline to Share Data in CIE**

To opt out of CIE, clients can visit <https://ciesandiego.org/revoke/> or call 2-1-1 and request to opt out of CIE

**Online Revoke CIE Consent form for declining to share data in CIE only**



Revoke CIE Consent

To revoke consent please provide your information below and a CIE Team Member will contact you to continue the process.

First Name \* Last Name \*

Phone Number \* Email

Reason for Revoking Consent CAPTCHA

This helps us improve our consent process

I'm not a robot

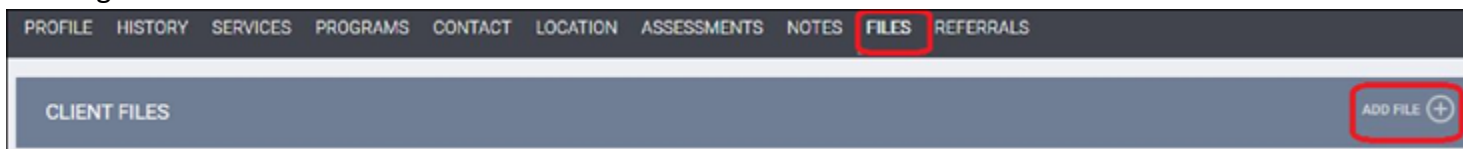
Submit

## How to record a Client Revocation in HMIS for HMIS and CIE

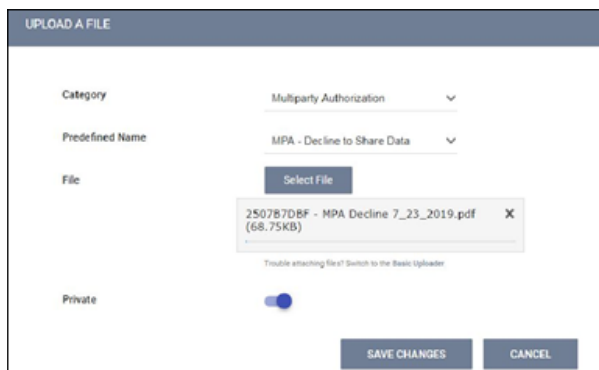
*Note: HMIS users are responsible for notifying the HMIS Support team of all client revocations. Client Revocations cover both HMIS and CIE. If a client is an HH whose revocation also covers dependent children then the HMIS Support team needs to be notified of all minor client records as well.*

### Upload a Scanned PDF of the signed [Client Revocation of Authorization](#) under the client's files tab in Clarity/HMIS

1. Scan the paper copy of the [Client Revocation of Authorization](#) which the client signed to revoke authorization to share. Save the scanned file using the following format filename:
  - a. Filename for revocation via revocation form: "[Client unique identifier] - MPA Revocation - [Date]". For example - "871B38D9 - MPA Revocation - 7\_30\_2019".
2. Navigate to the Files tab of the Clarity client record. From there, click on the "Add File" button on the far right of the header.



3. From the "Upload File" screen, make the following selections:
  - a. **Category:** Multiparty Authorization
  - b. **Predefined Name:** "MPA - Revocation of Authorization to Share Data".
  - c. **File:** Select the file containing the client's Revocation form.
  - d. **Private:** Toggle the Private button on. (If you cannot please let us know)
  - e. Click "Save Changes"
4. After you have uploaded the file successfully, please make sure client files remain secured.

A screenshot of the 'UPLOAD A FILE' form. The form has the following fields:

- Category: Multiparty Authorization (dropdown)
- Predefined Name: MPA - Decline to Share Data (dropdown)
- File: A file selection box showing '25078708F - MPA Decline 7\_23\_2019.pdf (68.75KB)' with a close button (X). Below it is a link: 'Trouble attaching file? Switch to the Basic Uploader'.
- Private: A toggle switch that is currently turned on (blue).

At the bottom of the form are two buttons: 'SAVE CHANGES' and 'CANCEL'.

5. If the client is an HH whose decline also covers dependent children then the same process needs to be followed under the dependent client records with one exception. The dependent client record/s will not have a file uploaded under the client's file tab. The client revocation form will remain only under the Head of Household's client record.

## How to work with a De-Identified Client record in the HMIS

If you are a homeless service provider working with a de-identified client record please:

- **Retain the Clarity unique identifier and any other identifying information** (such as name, date of birth, SSN, etc...) you will need in order to identify and update the client's record in Clarity throughout the course of serving them. Please retain this information on paper (in a manner meeting security requirements for HMIS data) and be sure that staff who might update the client's information in Clarity are aware of how to access their paper record in order to identify which Clarity record they need to update. Once the client record in Clarity has been de-identified, all identifying information will be removed and it will not be possible to locate their record based on information such as name, SSN or Date of Birth.
  
- Data entered in areas other than the client Profile need to be **privatized** in order to ensure it is only visible to the agency who entered it and is not shared. Existing data entered into these areas have been privatized, but for all new data please be sure to toggle on the "Private" toggle for any new records you create. This includes new data entered in the:
  - Programs tab
  - Contact tab
  - Location tab
  - Assessments Tab
  - Notes tab
  - Files tab
  
- **Do NOT update data for the following questions in the client's Profile screen moving forward:**
  - Social Security Number and Quality of SSN
  - First, Middle and Last Name and Quality of Name
  - DOB and Quality of DOB
  
- The following questions in the Profile screen can be updated if you receive updated information or complete information for a question that you did not previously have data for:
  - Gender
  - Race
  - Ethnicity
  - Veteran Status