NE FL CoC December 14, 2023

Duval | Clay | Nassau – FL 510

FL-510

Nassau Duval Clay

WELCOME
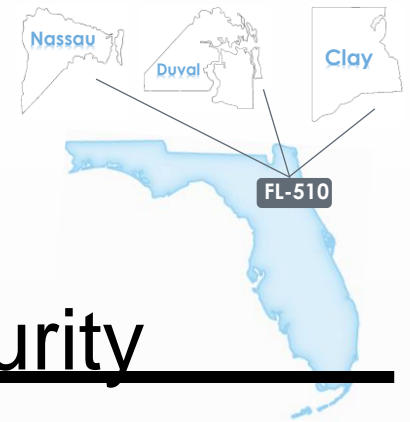# CoC Members!

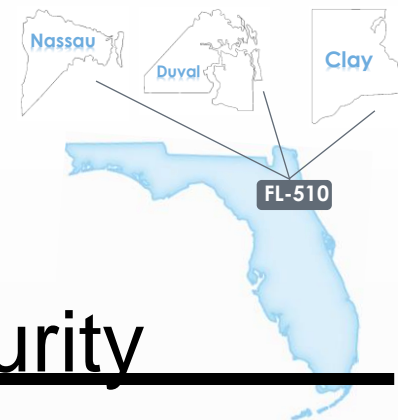Nassau

Duval

Clay

FL-510
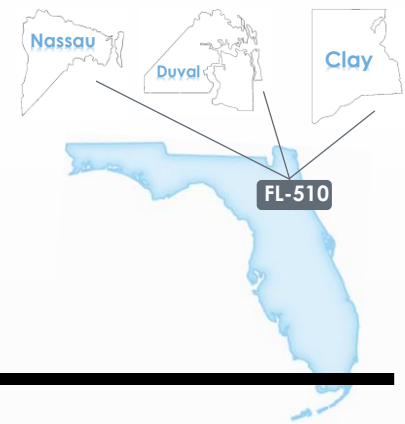
General Updates

- Memorial | December 21st
  ---CRM
  ---Send names today!
    melton@changinghomelessness.org

HMIS Data Privacy and Security

HMIS Data Privacy and Security

- Collecting and sharing participants' personal information is often a necessary aspect of helping resolve their housing crisis

- It is important for providers to make informed policies and procedures and fully understand the following:

  - How data is collected, used, stored, and disclosed across system of care

  - Understand the responsibility to protect client information and be able to articulate those responsibilities to clients in a meaningful way

Key Rules, Regulations, and Privacy Fundamentals

- HUD HMIS Data Technical Standards
  - Establishes standards for collecting, using, and disclosing data in HMIS
- Health Insurance Portability and Accountability Act (HIPAA)
  - Governs how health care providers, health care clearinghouses, and health plans disclose data
- 42 CFR Part 2
  - Restricts how drug and alcohol treatment programs disclose client records
- Privacy Act (5 U.S.C. 552a)
  - Requires written consent to disclose client records
- Violence Against Women Act (VAWA), Family Violence Prevention Services Act (FVPSA), and Victims of Crime Act (VOCA)
  - VAWA contains strong, legally codified confidentiality provisions that limit Victim Service Providers from sharing, disclosing, or revealing personally identifying information (PII) into shared databases like HMIS
- State and local privacy laws
  - May place additional restrictions on sharing, using, or disclosing data
  - When privacy laws conflict, use the more restrictive law and the higher standard
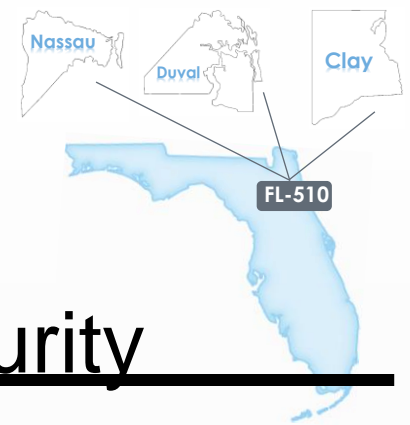
Implications for Victim Service Providers

- Domestic violence providers are prohibited from entering PII into HMIS, and must use a comparable database
  - This database must be comparable to HMIS in its capacity to support HUD privacy and security requirements and at a minimum, meet Data Standards requirements and produce HUD required reporting
- Victims of domestic violence must have access to the coordinated entry process
  - May be through a separate access point and assessment tool
  - Safety and confidentiality is essential when sharing data or referring clients
  - All data use and disclosure policies and procedures should be developed to ensure that regardless of where the household fleeing domestic violence presents for service, safe and equal access to homeless services and housing programs is provided while protecting their information
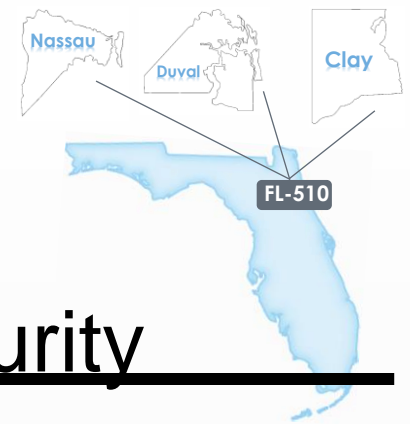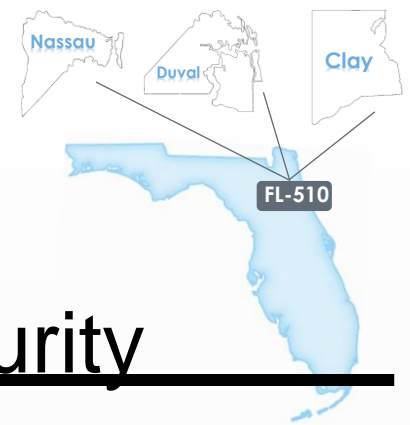
Data Privacy Requirements

- HUD requires the CE process to adhere to the baseline HMIS privacy requirements for all methods of data collection, use and disclosure, including electronic, paper and verbal disclosures

- At a minimum, the CoC's privacy standards should be communicated through two primary methods:

  1. CoC's Coordinated Entry Policies and Procedures; and

  2. Privacy Notice, which includes:

     - Description of participant rights

     - Participant options*

     - Provider's responsibilities to protect PII, and

     - How the provider will use and disclose the participant's information

- *Reminder: CoCs are prohibited from denying services to participants if they refuse their data to be shared, unless federal statute requires so as a condition of program participation (HUD Coordinated Entry Notice: Sections II.B.12.c and II.B.13)

Data Privacy Requirements

- A provider must collect PII by lawful and fair means and, where appropriate, with the knowledge or consent of the individual

- When required by law to collect information, providers are not required to seek participant consent
  - In these required instances, participants may refuse to provide the information and still receive services, but the provider must ask

- In all circumstances, providers should make data collection transparent by providing participants with a written copy of the privacy notice

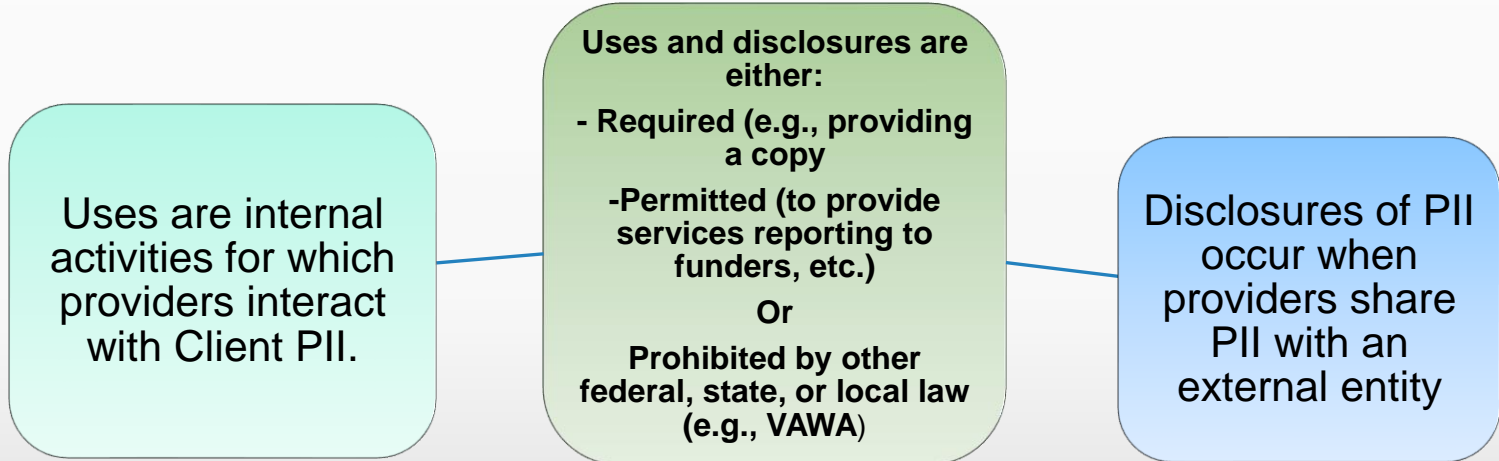# HMIS Data Privacy and Security

Public Statement Example

" We collect personal information directly from you for reasons that are discussed in our privacy notice. We may be required to collect some personal information by law or by organizations that gives us money to operate this program. The personal information we collect is important to run our programs, to improve services for persons experiencing homelessness, and to better understand the needs of persons experiencing homelessness…"
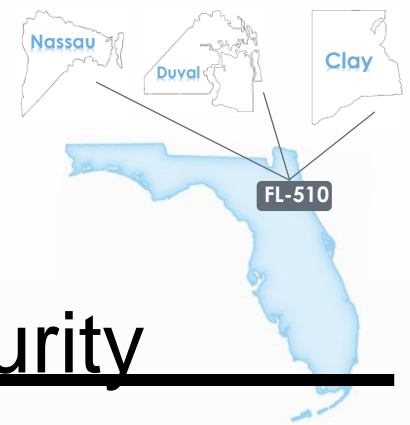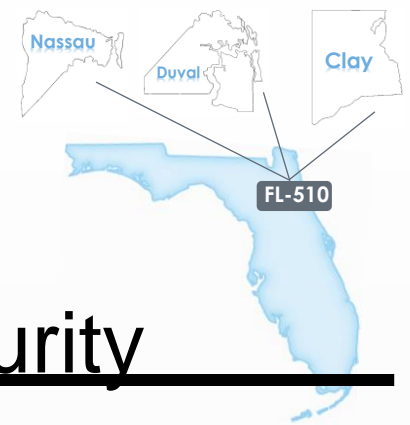
HMIS Data Privacy and Security

Once data is collected, providers have obligations about how that information is used and disclosed.

DATA USES AND DISCLOSURES

Uses are internal activities for which providers interact with Client PII.

Uses and disclosures are either:

- Required (e.g., providing a copy

-Permitted (to provide services reporting to funders, etc.)

Or

Prohibited by other federal, state, or local law (e.g., VAWA)

Disclosures of PII occur when providers share PII with an external entity

The provider's uses (internal) and disclosures (external) of collected information must be stated in the privacy notice.

DATA USES AND DISCLOSURES

PROVIDING OR COORDINATING SERVICES TO AN INDIVIDUAL

CREATING DE-IDENTIFIED CLIENT RECORDS FROM PII

CARRYING OUT ADMINISTRATIVE FUNCTIONS (E.G., LEGAL, AUDIT, PERSONNEL, OVERSIGHT, AND MANAGEMENT FUNCTIONS)

FUNCTIONS RELATED TO PAYMENT OR REIMBURSEMENT FOR SERVICES

HMIS Data Privacy and Security

Providers are also allowed (in some cases required) to disclose information in the following ways without participant consent, as long as they are clearly documented in the privacy notice.

DATA USES AND DISCLOSURES

Uses and disclosures required by law

Uses and disclosures to avert a serious threat to health or safety

Uses and disclosures about victims of abuse, neglect, or domestic violence

Uses and disclosures for research purposes

Uses and disclosures for law enforcement purposes

Important: Uses and disclosures not listed in the privacy notice require the participant's consent
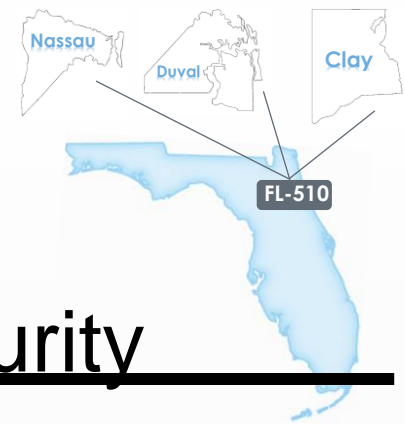
AUTHORITY TO DISCLOSE IS NOT UNLIMITED

If a legal entity or public health agency is not seeking or requiring individual PPI, then PPI should not be disclosed

If it is sufficient to give adequate information to a provider without disclosing PPI of one or more participants, then it would be appropriate not to disclose PPI.

Do not send a list of all participants to a provider if only one individual is being referred or a subset of individuals are being referred
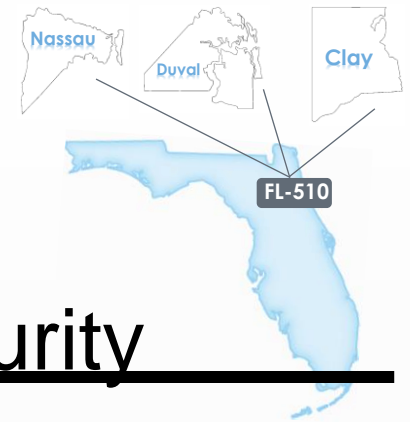
Uses and Disclosures that require consent

Authorization Forms are required for both uses and disclosures of PII that are not required or permitted per HUD's 2004 HMIS Data and Technical Standards. This should occur if the CoC identifies uses or disclosures that are necessary to make the CE process operate effectively and efficiently, yet those uses and disclosures are not permitted without consent per HUD's 2004 HMIS Data and Technical Standards.
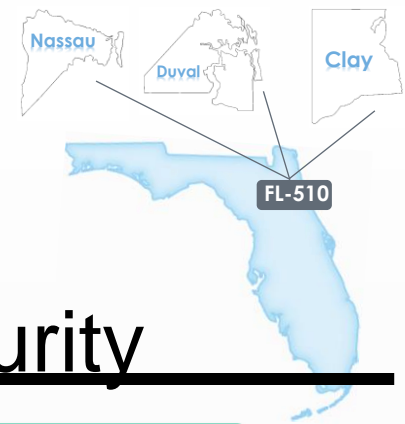
Many CoCs currently use a form called a "release of information" (ROI).

- ROIS are commonly used to gain consent for disclosures but they might not include uses.
- If your CoC uses an ROI, be sure that it indicates both data disclosures and data uses for which consent is required

# HMIS Data Privacy and Security

DATA SECURITY

Data Security

- ClientTrack is in constant communication with the HUD office and meets all the standards and requirements for data security.
- HMIS team sends out a security check-list to new agencies at the time of project set-up

Physical Workstation Security

- Access to workstations must be controlled and monitored
  - If not continuously staffed must be secured
- Workstation requires username and password
- Password protected locking screen saver
- Stored in a secure location- locked office area

FL-510

Nassau

Duval

Clay
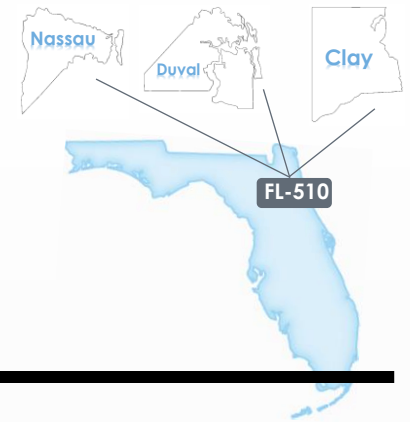
WHAT IT IS AND HOW TO HELP!

THANK YOU FOR YOUR INTEREST

We're glad you're here.

What is Point In Time?

WHAT:

The PIT Count is a national, HUD mandated, annual census and survey of our neighbors experiencing homelessness. PIT is used to access all kinds of funding for our agencies, as well as *keep* our existing funding. *Everyone* should care about PIT!

CHANGING
homelessness

WHEN:

Clay: Tuesday, January 23

Nassau: Wednesday, January 24

Duval: Thursday, January 25

WHERE:
- "Zones" throughout Clay, Duval, Nassau

WHO HELPS:
- Our Northeast Florida community, CoC members
- Looking for Zone Commanders
  - POC for volunteers in each Zone

What is Point In Time?

The Survey + App

Everyone who wants to help must download the app, which holds the survey tool we give to those experiencing homelessness during PIT.

The survey tool allows for targeted **outreach** efforts and includes **demographic** information and **history** of homelessness in our community.

Register

NEFL24.POINTINTIME.INFO

More Ways to Help!

Annual Events

EVERY JANUARY...

We conduct the **Point in Time** count, or the annual homeless census.

EVERY MAY...

We release the findings of the count at our **Volunteer Appreciation** breakfast.

EVERY DECEMBER...

We remember those who lost their lives while homeless with the **Homeless Memorial Service**.

HYGIENE KIT INFO

Contact Kalilah and she'll come grab your items that we can put in our hygiene kits!

She'll provide info with how to organize community collection & drop off!

WHAT WE NEED

Socks

Toothbrush/paste

Mouthwash

Deodorant

Snacks

Water

PIT COUNT INTEREST + INFORM MEETING FOR GENERAL PUBLIC

Tuesday, December 19

10AM-11AM EST

Teams Meeting - Email Kalilah

for the link, or put your email in

the chat!

Charles Temple, Director of Information Management System
ctemple@changinghomelssness.org
Office: 904-570-5437

Kalilah Jamall, Volunteer Coordinator
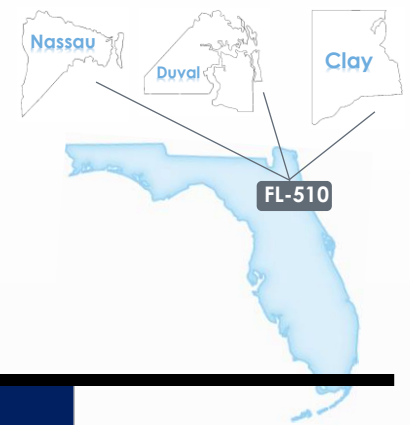kjamall@changinghomelessness.org

Questions?

"One who never asks either knows everything or nothing."   - Malcolm Forbes
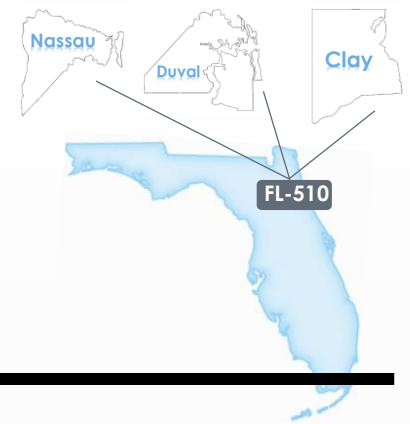
Events & Announcements

What's new with YOU?

PLEASE JOIN US

Memorial Service

FOR THOSE WHO PASSED WHILE EXPERIENCING HOMELESSNESS

THURSDAY 8:30 AM | **21** | DECEMBER 2023

City Rescue Mission
426 McDuff Ave South

FSS
Family Support Services
DUVAL AND NASSAU COUNTIES

Please join us for

BREAKFAST LEARNING SERIES

Joint event for Duval and Nassau counties
Wednesday, Jan. 17 • 9–10:30 a.m.
Human Trafficking in Northeast Florida

Did you know: Florida ranks third in the nation for the number of human trafficking reports called to the hotline? Human trafficking is modern slavery. There are 30 million people enslaved throughout the world, with 2.5 million located right here in the U.S.

Upon completion of this webinar, attendees will be able to:

- Define human trafficking, including the types of human trafficking and the extent of human trafficking.
- Understand factors that place a person at greater risk of human trafficking.
- Recognize indicators of human trafficking.
- Provide the hotlines for reporting human trafficking.
- Provide public and private resources for social services and legal services.

Guest speaker
Marina Anderson
Regional Human Trafficking Coordinator, Northeast & Northwest Regions
Florida Department of Children and Families

Get registered today!
To register, email fss.bls.jax@fssnf.org or call 904-402-4684
Connect to tune in and learn about featured topics in our community:
Zoom dial-in meeting details:
In Florida, dial 301-715-8592 or 646-558-8656
Meeting ID: 378 224 0466

Breakfast Learning Series is free for parents, caregivers, social services professionals and the general public. The monthly programs provide beneficial information and opportunities for everyone involved with helping parents and raising children.

Accommodations for individuals with disabilities will be made upon request in advance. Interpreter services are provided free of charge for persons who are deaf or hard of hearing.

Quigley HOUSE

Better Together series

3rd Monday* | 5:30pm
Fleming Island Library

Free and open to all →

- 8/21/23 - Creating Healthy Relationships
- 9/18/23 - Making the Most of Your Time
- 10/16/23 - Saying "No" Is Okay!
- 11/20/23 - Stress & How to Manage It.
- 12/18/23 - Tapping into Holiday Magic
- 1/29/24*- New Year, New Me?
- 2/26/24* - Loving Yourself Selfishly

Join the conversation. Snacks provided.

To Learn More

904-284-0340 x 319
education@quigleyhouse.org

Website www.quigleyhouse.org
Facebook Quigley House
Instagram @quigley_house
Twitter @quigleyhouse

Quigley HOUSE

Life Skills Breakdown series

Join the conversation. Snacks provided.

1st Thursday | 5:30pm
Fleming Island Library

Free and open to all →

- 8/3/23 - Everyday Smart Spending
- 9/7/23 - Tips for Entrepreneurs, Where to Start?
- 10/5/23 - The Psychology of Money
- 11/2/23 - Want to Earn Passive Income? Let's Talk!
- 12/7/23 - How Do I Improve My Credit?
- 1/4/24 - Managing My Time Effectively
- 2/1/24 - Establishing Healthy Boundaries

To Learn More

904-284-0340 x 333
education@quigleyhouse.org

Website www.quigleyhouse.org
Facebook Quigley House
Instagram @quigley_house
Twitter @quigleyhouse

The 3rd WEDNESDAY of the Month
515 College Drive Middleburg, FL 32068
3:00pm to 6:00pm

Mercy SUPPORT SERVICES

EMMANUEL PROJECT

WWW.EMMANUELPROJECT.ORG

Our mobile medical unit provides healthcare services to underserved and uninsured adult and pediatric populations throughout Northeast Florida.

Our Services
- Medical Care for Adults & Children
- School & Sports Physicals
- Hypertension management
- Healthcare Education

We Provide

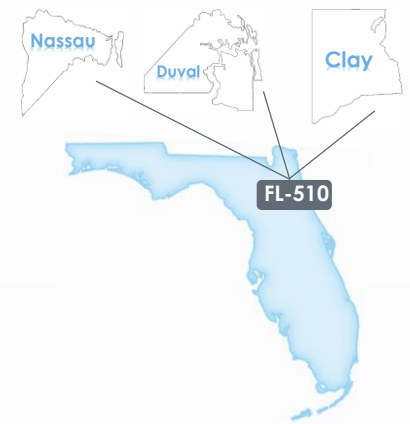**High-Quality No Cost Healthcare**

Call
904-479-0279

Email
support@emmanuelproject.org

Instagram
@EmmanuelProjectofNortheastFL

Facebook
Emmanuel Project (of Northeast Florida)

Patients must be at or below 200% of the federal poverty guidelines for their household size (as established by the Florida Department of Health), uninsured or limited access to healthcare.

Questions?

Thank you!