

Privacy and Security Training

September 2024



NC COALITION to end
HOMELESSNESS

Agenda

1. Annual Privacy Training
2. Reminders about PII security
3. What to do when...



Annual Privacy Training

Annual Privacy Training

Required by HUD but also a good idea!

Learning Management System

- Login: <https://hmisncceh.unhosting.site/>
- If you don't know your username or password, ask hmis@ncceh.org!
- Then complete NC Privacy and Security 2024-2025 Course!
 - View the *new* 2024-2025 training
 - Pass the *new* Quiz after finishing
 - Review and Sign the *new* User Agreement





Reminders about PII

Data that is always Personally Identifiable Info

Name

Social Security
Number

Email Address

Phone
Number

Location /
Physical
Address

Data that can sometimes be Personally Identifiable Info, when combined

Date of Birth

Age

Gender

Race /
Ethnicity

Client ID

Household
Composition

Sexual
Orientation

Project Start
Date

Project Exit
Date

Project
Name/ ID

Other Data



HMIS@NCCEH Release of Information

What's Allowed and Who Can See?

Sharing Data within your Agency

- Agencies may use data for the Allowable Uses and Disclosures described in the ROI and in the Privacy Notice when clients present for services.



Allowable Uses and Disclosures

The included agencies will collect personal information directly from you and your household to determine your eligibility for services and connect you with other helping agencies. **Agencies only collect personal information that is appropriate for getting you housed to improve programs and the lives of people experiencing homelessness.** The collection and use of all personal information is guided by strict standards of confidentiality.

We only use your personal information in ways that may benefit you directly or indirectly as follows:

- To provide or coordinate services on behalf of an individual or household;
- For payment or reimbursement for services;
- To carry out administrative functions, including but not limited to oversight and management functions; or
- For creating reports as defined in the Privacy Notice (available upon request)

HMIS@NCCEH Release of Information

What's Allowed and Who Can See?

Sharing Data outside your Agency

- Agencies may use data for the Allowable Uses and Disclosures described in the ROI and in the Privacy Notice when clients present for services.

HMIS@NCCEH Release of Information

Clients can choose how to share HMIS data outside of your Agency

Section 1: HMIS Standard Information

SECTION 1 – NCCEH HMIS Standard Information

Standard information can be seen by all participating agencies that use our HMIS implementation. This information allows us to de-duplicate files and select the correct record. All persons using HMIS are trained and certified in privacy.

What information is shared about you in HMIS?

- Name
- Age/year of birth
- Veteran status
- Gender
- Partial social security number

If you have a privacy concern, you can mark No so that only our Agency can see this information. Declining Standard Information sharing may result in duplicate profiles and gaps in your service history.



HMIS@NCCEH Release of Information

Consent to visibility in HMIS but outside of your Agency

Section 2: Local Data Sharing

SECTION 2 – Local Data Sharing

Our agency has agreed to share information on clients in HMIS with other agencies. This means that your information will be visible **to HMIS users from those other agencies coordinating locally** and that your information may be discussed verbally, in writing, electronically, or in documents downloaded from HMIS. If you choose to share, both your current and historical information can be shared. A list of agencies we share with can be found by looking up our agency name at: ncceh.org/hmis/clientconsent.

What information is shared about you in HMIS with these local agencies?

- Name
- Age/year of birth
- Veteran status
- Gender
- Partial social security number
- Demographic information (e.g. race, veteran)
- Income and benefit information
- Disability information
- Program enrollment, services, and referrals
- Coordinated entry notes
- Domestic violence status
- CE Housing Assessment
- History of housing, homelessness, and services provided to you

If you have a privacy concern, you can mark No so that only our Agency can see this information. Declining Local Data Sharing may result in delayed service delivery that depends on coordination.



HMIS@NCCEH Release of Information

Consent to visibility in HMIS but outside of your Agency

Section 2: Local Data Sharing

- If you or clients have questions about which agencies share information in HMIS, a full list of Sharing Groups is available online

1	Primary Agency (ROI Section 1)	Agencies with Visibility (ROI Section 2)	Durham	Orange	Region 1	Region 2
369	Harbour House	Union Mission				
370	Harbour House	United Community Ministries				
371	Harbour House	Volunteers of America				
372	Haywood Pathways	Asheville Buncombe Community Christian Ministries			x	
373	Haywood Pathways	HERE in Jackson			x	
374	Haywood Pathways	Hurlburt Johnson Friendship House			x	
375	Haywood Pathways	NC Balance of State CoC Staff			x	
376	Haywood Pathways	Southwestern Child Development			x	
377	Haywood Pathways	Vaya Health			x	
378	HERE in Jackson	Asheville Buncombe Community Christian Ministries			x	
379	HERE in Jackson	Haywood Pathways			x	
380	HERE in Jackson	Hurlburt Johnson Friendship House			x	

Data is most secure when it is in HMIS



Downloading, printing, sending information risks exposure



When in doubt, keep it in HMIS!



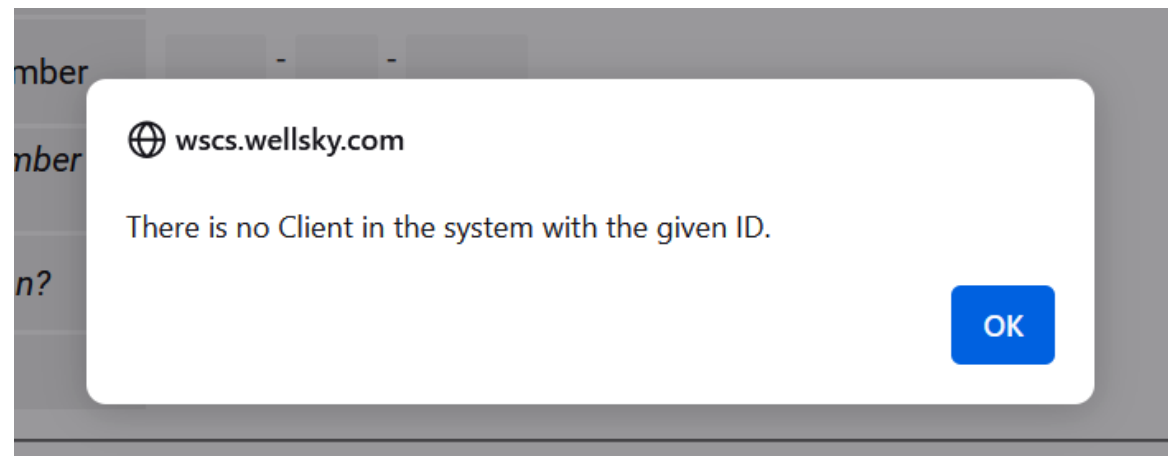
What to do when...

What happens when clients say no

No to *ROI Section 1: Standard Information*




- Agencies outside of the original cannot view or search for the client
- Mark the ROI tab permission as No
- Attach the paper ROI to document

To everyone else, this
Client ID will not exist



What happens when clients say no

1. Create a new Client ID
2. Mark the eROI Permission as “No”
3. Attach the paper ROI to document the specific sections declined
4. **Email the Data Center Helpdesk**

Client Information			Service Transactions			
Summary	Client Profile	Households	ROI	Entry / Exit	Case Managers	Case Plans
Release of Information						
	Provider		Permission	Start Date	End Date	
 	Heading Home - Rowan County - Emergency Shelter		No	09/01/2024	09/01/2025	

What happens when clients say no

No to *ROI Section 2: Local Data Sharing*

- Agencies participate in Visibility / Sharing Groups cannot view the full Client Profile, Project Start, Interim, or Exit Assessments in HMIS
 - Clients can decline all or some of the partners
- The ROI tab is marked as No
- Attach the paper ROI to document

What happens when clients say no

No to ROI Section 2: Local Data Sharing

- Agencies participate in Visibility / Sharing Groups cannot view the full Client Profile, Project Start, Interim, or Exit Assessments in HMIS
 - Clients can decline all or some of the partners

Groups of projects are added after agencies sign sharing agreements

Visibility Groups		Deny Groups		
	Group ID	Group Name	Group Type	Last Updated
[-]	16563	Durham CE Community Wide Sharing Group 02282020	Local	09/01/2024
[-]	16979	Heading Home Internal Visibility Group	Local	09/01/2024

Add Visibility Group

Showing 1-2 of 2

Groups of projects are removed manually when a client blocks sharing




Visibility Groups		Deny Groups		
	Group ID	Group Name	Group Type	Last Updated
[-]	16388	xxxClosed2020 Mt. Sylvan UMC - Durham County(20120)	Public	09/01/2024

Add Deny Group

Showing 1-1 of 1

What happens when clients say no

1. Create a new Client ID
2. Mark the ROI Permission as “No”
3. Attach the paper ROI to document the specific sections declined
4. **Email the Data Center Helpdesk**

Client Information			Service Transactions			
Summary	Client Profile	Households	ROI	Entry / Exit	Case Managers	Case Plans
Release of Information						
	Provider		Permission	Start Date	End Date	
 	Heading Home - Rowan County - Emergency Shelter		No	09/01/2024	09/01/2025	

What if a client is still concerned?

If a client is worried about a profile in HMIS, there are other options:

1. Hide their Name in an “Unnamed record”
 - Collect client information on paper forms
 - Contact Data Center to switch your HMIS license to only create Unnamed records
 - Save the client ID number in a secure location
2. Clients may use a code-name, pseudonym, or partial name to obscure/de-identify their information
 - Mark Name Data Quality as “Partial”
 - This will be reported as an error in reports

When in doubt

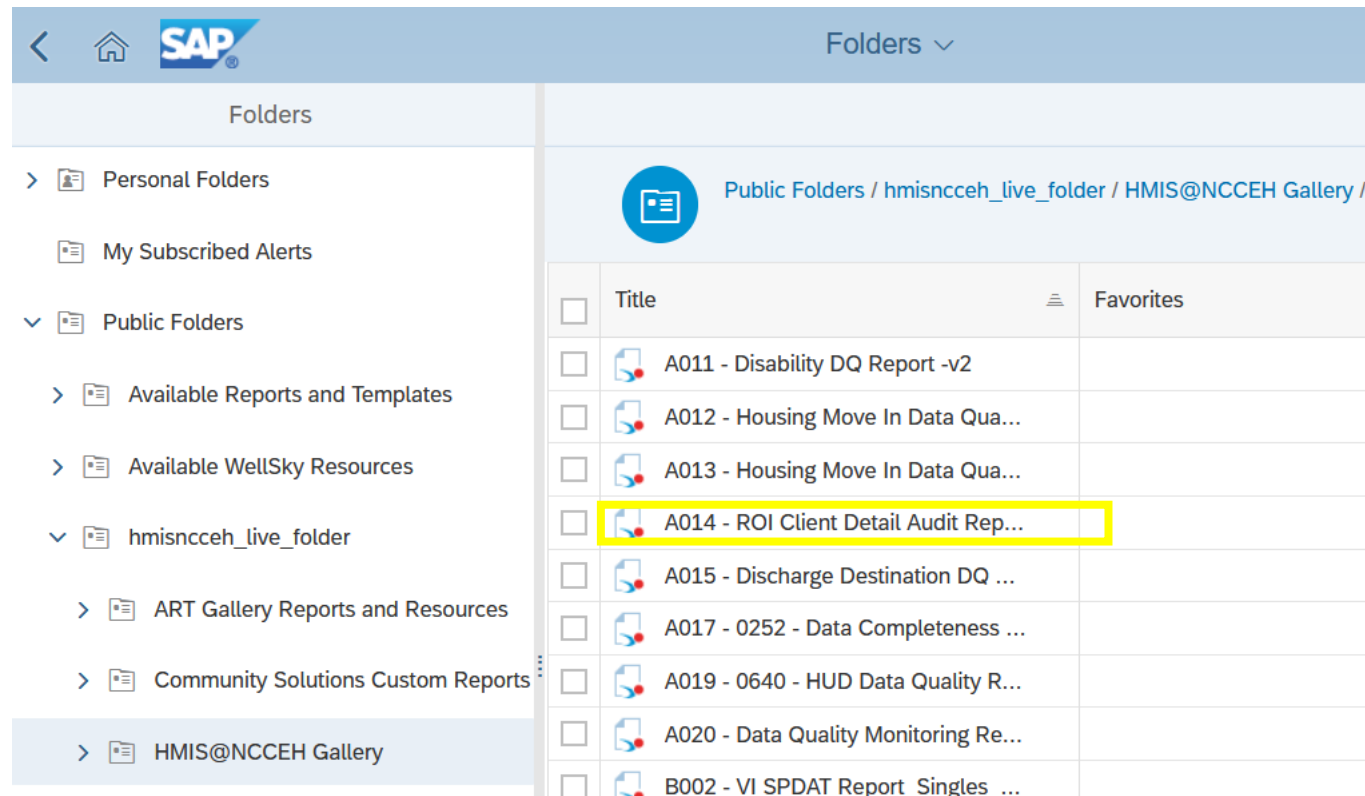
1. Collect Paper Forms
2. Contact the Data Center (hmis@ncceh.org)



ROI Audit Report

A014 - ROI Client Detail Audit Report

View the ROI status of all clients within two dates!



The screenshot shows the SAP Folders interface. The left sidebar lists various folders, including 'Public Folders' and 'hmisncech_live_folder'. The main area displays a list of reports under the path 'Public Folders / hmisncech_live_folder / HMIS@NCCEH Gallery'. The report 'A014 - ROI Client Detail Audit Rep...' is highlighted in yellow.

<input type="checkbox"/>	Title	Favorites
<input type="checkbox"/>	A011 - Disability DQ Report -v2	
<input type="checkbox"/>	A012 - Housing Move In Data Qua...	
<input type="checkbox"/>	A013 - Housing Move In Data Qua...	
<input type="checkbox"/>	A014 - ROI Client Detail Audit Rep...	
<input type="checkbox"/>	A015 - Discharge Destination DQ ...	
<input type="checkbox"/>	A017 - 0252 - Data Completeness ...	
<input type="checkbox"/>	A019 - 0640 - HUD Data Quality R...	
<input type="checkbox"/>	A020 - Data Quality Monitoring Re...	
<input type="checkbox"/>	B002 - VI SPDAT Report Singles ...	

A014 - ROI Client Detail Audit Report

EDA Provider: default for multiple projects, match EE Provider for one

EE Provider: select all applicable projects

Start Date: the earliest date to include enrollments

End Date (Plus One Day): the latest date to include enrollments + 1

The screenshot displays a software interface for generating an ROI Client Detail Audit Report. The interface is divided into several sections:

- Search Bar:** Located at the top left, with the text "Search" and a magnifying glass icon.
- Filters List:** A list of filters on the left side, each with a checkmark and a count in parentheses:
 - EDA Provider (1) -Default Provider-
 - EE Provider(s) (1) Heading Home - Rowan County - Emergency Shelter(7389)
 - Start Date: (1) 1/1/2024 12:00:00 AM
 - End Date (Plus One Day): (1) 12/31/2024 12:00:00 AM
- EDA Provider Section:** On the right, there is a section titled "EDA Provider" with a search bar and a refresh button. Below the search bar, there is an information icon and the text: "To see the content of the list, click the refresh values button."
- Buttons:** At the bottom, there are three buttons: "Reset All", "Run" (highlighted in yellow), and "Cancel".

A014 - ROI Client Detail Audit Report

	A	B	C	D	E	F	G
1							
2	Heading Home - Rowan County - RRH - Private						
3							
4	Group ID	HMIS Client ID	Entry Date	ROI Date Started	Date Ended	ROI Permission	ROI Provider
5	1221225	1048719	2/14/2024	12/19/2023	#####	Yes	Heading Home - Rowan County - RRH - Private (1234)
6	1223117	1051505	2/29/2024	2/29/2024	#####	Yes	Heading Home - Rowan County - RRH - Private (1234)
7	1225513	1048719	3/18/2024	12/19/2023	#####	Yes	Heading Home - Rowan County - RRH - Private (1234)
8	1226938	1052139	3/20/2024	3/20/2024	#####	Yes	Heading Home - Rowan County - RRH - Private (1234)
9	1232090	379583	5/13/2024	5/13/2024	#####	No	Heading Home - Rowan County - RRH - Private (1234)
10	1233877	1051380	5/9/2024	5/9/2024	5/8/2025	Yes	Heading Home - Rowan County - RRH - Private (1234)
11	1233877	1054494	5/9/2024	5/9/2024	5/8/2025	Yes	Heading Home - Rowan County - RRH - Private (1234)
12	1233877	1054495	5/9/2024	5/9/2024	5/8/2025	Yes	Heading Home - Rowan County - RRH - Private (1234)

Additional Resources

HMIS@NCCEH Privacy Documents

<https://www.ncceh.org/hmis/>

HMIS@NCCEH Client Consent and Information Page

<https://www.ncceh.org/hmis/clientconsent>

HUD's HMIS Requirements Proposed Rule

<https://www.federalregister.gov/documents/2011/12/09/2011-31634/homeless-management-information-systems-requirements#h-26>

FTC Consumer Advice: Online Privacy and Security

<https://consumer.ftc.gov/identity-theft-and-online-security/online-privacy-and-security>



Contact NCCEH

hello@ncceh.org

919.755.4393

NCEndHomelessness 

@NCHomelessness 

nc_end_homelessness 

Contact NCCEH Data Center Help Desk

hmis@ncceh.org

919.410.6997



NCCEH