

COORDINATED ENTRY P&P, ATTACHMENT VI: UNIVERSAL PRIVACY NOTICE

The following statement should be read or shared with participants coming in to contact with the Coordinated Entry System: The Resource Connect Solano Coordinated Entry System collects personal information directly from you for reasons that are discussed below. It may be required to collect some personal information by law or by organizations that provide funding to operate the program. The personal information RCS collects is important to run its programs, to improve services for persons experiencing homelessness, and to better understand the needs of persons experiencing homelessness. RCS shall only collect information that its management entity considers to be appropriate and consistent with the policies and procedures created by the Housing First Solano Continuum of Care General Membership.

The following provisions, as well as relevant policies and procedures created by the Housing First Solano Continuum of Care General Membership, may be amended at any time. Such amendments will affect information obtained before the date of the amendment.

PERSONALLY IDENTIFIABLE INFORMATION DEFINITION

Personally Identifiable Information (PII). Defined in OMB M-07-16 as “...information which can be used to distinguish or trace an individual’s identity, such as their name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc.”

Non-personally identifiable information (non-PII) is data that cannot be used on its own to trace, or identify a person.

RESPONSIBILITY TO PROTECT PERSONALLY IDENTIFIABLE INFORMATION

Resource Connect Solano shall be responsible for protecting participant’s Personally Identifiable Information in accordance with existing laws and regulation. When other federal or state data privacy or security laws apply, Resource Connect Solano shall comply with the requirements that ensure the greatest protection for the participant’s Personally Identifying Information. Relevant protections may include:

- 24 CFR 578.7(a)(8) and Section II.A
- HUD’s HMIS Privacy and Security Notice
- HUD’s 2004 HMIS Data and Technical Standards
- Health Insurance Portability and Accountability Act (HIPAA)
- Section 407 of The McKinney-Vento Homeless Assistance Act, as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009
- The Violence Against Women’s Act (VAWA)

USES AND DISCLOSURES OF PARTICIPANT INFORMATION

Per the 2004 HMIS Data and Technical Standards, Resource Connect Solano must disclose Personally Identifiable Information when required to by the U.S. Department of Housing and Urban Development for oversight of compliance with HMIS data privacy and security standards.

Resource Connect Solano *may* use and disclose Personally Identifiable Information without participant consent for the following purposes:

- **As** required by law
- **To** avert a serious threat to health or safety
- To provide or coordinate services to an individual
- For functions related to payment or reimbursement for services
- To carry out administrative functions, including but not limited to legal, audit, personnel, oversight, and management functions
- For creating de-identified data from Personally Identifiable Information

Any other uses and disclosures not allowed by the 2004 HMIS Data and Technical Standards shall require participant consent.

PARTICIPANT RIGHTS AND OPTIONS

All participants shall receive a copy of this Privacy Notice before going through the VI-SPDAT assessment process.

Resource Connect Solano must disclose Personally Identifiable Information about a participant when that participant asks for access to his or her own information.

All Resource Connect Solano participants shall be notified of their right to file a use or disclosure complaint using the form below.

When a use or disclosure complaint is received, the CoC Board will complete an investigation of the complaint within 60 days by attempting to contact and interview a reasonable number of persons who are likely to have relevant knowledge, and by attempting to collect any documents that are likely to be relevant to the investigation. Within 30 days after completing the investigation, the CoC Board will write an adequate report of the investigation's findings, including the investigator's opinion about whether inappropriate discrimination occurred, and the action(s) recommended by the investigator to prevent inappropriate use or disclosure from occurring in the future. If appropriate, the investigator may recommend that the complainant be re-assessed or re-prioritized for housing or services. The report will be kept on file for five years.

PERSONALLY IDENTIFIABLE INFORMATION USE OR DISCLOSURE COMPLAINT FORM

The Confidentiality rules are as follows: All information provided to the Housing First Solano Continuum of Care concerning incident(s) of improper use and/or disclosure of Personally Identifiable Information of shall be kept confidential. Such details shall be stricken from any shared database until a pending complaint of improper use or disclosure is resolved. Housing provider employees are not to have access to these details unless to grant or deny relief as provided by federal or state law. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON FILING A COMPLAINT

1. Name of complainant:

2. Your name (if different from complainant):

3. Address or phone number for contacting the complainant:

4. Name of the person or entity against whom this complaint is being filed (if known and can be safely disclosed):

5. Date(s), Time(s) and location(s) of incidents:

6. Description of perceived inappropriate use or disclosure suffered:

7. If voluntarily provided, list any third-party documentation you are providing along with this notice:

This is to certify that the information provided on this form is true and correct to the best of my knowledge. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of relief.

Signature _____

Signed on (Date) _____

Please return this form to:

Housing First Solano Continuum of Care
c/o the Community Action Partnership of Solano, Joint Powers Authority
Attn: Kathy Lawton-Caesar, Chair
701 Civic Center Boulevard
Suisun City, CA 94585
solano@homebaseccc.org

PARTICIPATING PROVIDER OBLIGATIONS

Each provider participating in Resource Connect Solano shall require all individuals and participant organizations with access to PII, not limited to their staff members, to sign a confidentiality agreement that acknowledges receipt of a copy of the Privacy Notice and that pledges compliance with it. The participating providers shall be responsible for keeping these signed statements on file for a minimum of five years after the departure of each relevant staff member.

Each participating provider shall place a sign at data collection points with a statement explaining why information is being collected and how to obtain this Privacy Notice.

In instances where data is collected by phone, operators shall read the opening statement to all callers and inform them how they can receive a full copy of the Privacy Notice.

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that its management entity considers to be appropriate and consistent with the policies and procedures created by the Housing First Solano Continuum of Care General Membership.

PROVIDER TRAINING

Resource Connect Solano shall train coordinated entry, intake staff and participating organizations on the CoC's privacy practices to maximize consistency and clarity for participants.