

Data Collection Limitation Policy

Personal information will be collected for the Homeless Management Information System when it is needed to provide services, or when it is required by law. Personal information may be collected for these purposes:

- To provide or coordinate services for guests/residents
- To comply with government and grant reporting obligations
- For research and statistical purposes (personal information released for research and statistical purposes will be anonymous)
- When required by law

Only lawful means are used to collect personal information.

Limitations of HMIS Use

Public Action to Deliver Shelter Inc., dba Hesed House will use and disclose personal information from HMIS only in the following circumstances:

- 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, planning, oversight or management functions.
- Databases used for research, where identifying information has been removed.
- Contractual research where privacy conditions are met.
- Where a disclosure is required by law and disclosure complies with and is limited to the requirements of the law. Instances where this might occur are during a medical emergency, to report a crime against staff of the agency or a crime on agency premises, or to avert a serious threat to health or safety, including a person's attempt to harm himself or herself.
- To comply with government reporting obligations.
- In connection with a court order, warrant or other court proceeding requiring disclosure.

Guest/Resident Rights to Access and Correction of Files

Any guest/resident receiving services from Public Action to Deliver Shelter Inc., dba Hesed House has the following rights:

- Access to program records. Guests/Residents have the right to review their records in a program in the HMIS. A written request should be made to the HMIS Agency Administrator, who should follow-up on the request within five working days.
- Access to full records. Guests/Residents have the right to review their full record in the HMIS. They may make a written request through the HMIS Agency

Administrator, who must request approval from the HMIS Lead within five working days.

- Correction of an HMIS record. A guests/resident has the right to request that his or her HMIS record is correct so that information is accurate. This ensures fairness in its use.

Public Action to Deliver Shelter Inc, dba Hased House's Right to Refuse Inspection of an Individual Record. The agency may deny a guest/resident the right to inspect or copy his or her personal information for the following reasons:

- information is compiled in reasonable anticipation of litigation or comparable proceedings;
- information about another individual other than agency staff would be disclosed;
- information was obtained under a promise of confidentiality other than a promise from the provider and disclosure would reveal the source of the information; or
- Information reasonably likely to endanger the life or physical safety of any individual if disclosed.

Harassment. Public Action to Deliver Shelter Inc., dba Hased House reserves the right to reject repeated or harassing requests for access or correction. However, if the agency denies a guest/resident's request for access or correction, written documentation regarding the request and the reason for denial will be provided to the guest/resident. A copy of that documentation will also be included in the guest/resident record.