



Broward County Continuum of Care Homeless Management Information System

PRIVACY NOTICE

The Broward County Continuum of Care (CoC), the HMIS Lead Agency, and Covered Homeless Organizations (CHOs) strive to ensure and safeguard the confidentiality of all client data. This ensures fair information practices pertaining to: openness; accountability; collection limitations and the purpose and use limitations; access and correction of data collected; and data quality. CHO privacy and client confidentiality practices must comply with all applicable Federal, State, and local laws. Applicable standards include, but are not limited, to the following:

1. Federal Register vol. 69, No. 146 (HMIS FR 4848-N-02) – Federal statute governing HMIS information.
2. The Health Insurance Portability Act of 1996, as amended (HIPAA).
3. 42 CFR Part 2. – Federal statute governing drug and alcohol treatment.

As a client of the Broward Partnership (Partnership), the following measures have been implemented to protect the unauthorized and/or unintended disclosure of your personal protected information (PPI):

1. During admission and through the course of services, our staff will inform you of the purpose(s) of data collection and obtain your written consent prior to the disclosure of your PPI.
2. Our funders require that we maintain client information for a period of at least seven (7) years. Client records may be maintained electronically or via hard copy. All files are maintained in a secure location with access limited to authorized staff and/or funder representatives. In the event of an audit, records may be retained for a longer period.
3. Upon a determination that client information is appropriate for disposal, the documents will be reviewed by the Partnership's Compliance Unit and shredded.
4. Any client who seeks to review his/her client record, consent, or revoke his/her consent shall make the request in writing.
5. As a federally funded agency, the Partnership will not deny service due to a disability and/or language barrier and will make provisions to collect data accordingly. Additional information is presented in the Partnership's Auxiliary Aid Plan.
6. PPI will be used and disclosed only as specified in the privacy notice, and only for the purposes specified therein.
7. All clients have the right to inspect and obtain a copy of their client record.
8. Clients may submit a grievance related to questions or complaints about the privacy and security policies and practices of the Partnership.

MANDATORY COLLECTION NOTICE

We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the need of homeless persons. We only collect information that we consider to be appropriate.

We appreciate your cooperation with this process. A copy of the Privacy Notice is available upon request.