



## Columbus ServicePoint Use

Approved By: Becky Westerfelt, MSW, Executive Director

Approval Date: 06/28/2016

Last Review Date: 06/28/2016

### *Administrative Policy*

Huckleberry House will provide data to the Community Shelter Board (CSB) to be used to support the delivery of homeless and housing services in Columbus and Franklin County. Huckleberry House does not use public forums for data collection or reporting.

### *Procedure*

In accordance with CSB's Columbus ServicePoint Policies and Procedures, Huckleberry House will appoint a site administrator. The site administrator shall be the point of contact between Huckleberry House and CSB and will be responsible for administering the software and user accounts.

Each CSP user shall complete a Columbus CSP User Agreement and will be provided with a unique user name, initial password, and appropriate training. Users will be assigned an appropriate user level of access to the CSP data as determined by the site administrator. Users will maintain the security of all client data entered/extracted from the database. No Protected Personal Information (PPI), which is a subset of Protected Health Information, from CSP is stored on Huckleberry House computers or other storage devices. Collected data may be used to:

- Provide individual case management,
- Produce aggregate-level reports regarding use of services,
- Track individual program-level outcomes,
- Identify unfilled service needs and plan for the provision of new services,
- Allocate resources among agencies engaged in the provision of services,
- Conduct research for consulting and/or educational purposes, and
- Accomplish any and all other purposes deemed appropriate by CSB.

Huckleberry House will obtain a signed Client Acknowledgement for Electronic Data Collection Form from every client entering the program. . If the client refuses to sign the Acknowledgement form, program staff will write this on the form, sign it themselves, and place it in the client file.

## **CSP Quality Assurance Plan**

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### ***Administrative Policy***

Huckleberry House, Inc. accurately enters all required CSP data elements in a timely manner.

### ***Procedure***

A signed Client Acknowledgement for Electronic Data Collection Form will be obtained from every client entering the program. If the client refuses to sign the Acknowledgement form, program staff will write this on the form, sign it themselves, and place it in the client file. All required CSP data elements will be entered into the system by the data entry person assigned to the Transitional Living Program. This information will be entered as soon as the youth is entered into the agency clinical data base (not to exceed 48 hours after the completed intake).

On a monthly basis the IT Director (CSP Site Administrator) will run the Columbus Report for the previous month. A report from our Clinical Database will also be generated for this same time period. These documents will be reviewed by the program team leader to ensure that the data is accurate and that the missing data does not exceed 5%.

On a monthly basis, the TLP admit records will be reviewed to ensure that homeless status is documented with a CSP screen print or Verification of Street Homelessness form in in each file. Each admit record will be reviewed to ensure that a Vulnerability Assessment has been completed and filed in the client record. If any babies were added to the household in that month, we will check the client record and CSP to ensure that the admit date of the child matches his or her birthdate.

On a monthly basis, the data entry person will pull 4 files to verify that the data entry into the system is accurate and that the necessary consent form is in the clinical record.



**CLIENT ACKNOWLEDGEMENT FOR ELECTRONIC DATA COLLECTION**

When you sign this form, it shows that you understand the following:

We collect personal information about the people we serve in a computer system called the Columbus ServicePoint (“CSP”). The CSP is used by agencies which provide prevention, shelter and housing related services in Franklin County. Agencies using the CSP comply with all the requirements related to keeping your personal information private and secure.

We use the personal information to run our programs and help us improve our services. Also, we are required to collect some personal information by organizations that fund our program.

Your information will help us in getting the appropriate services for you through our program or programs offered by other agencies.

You have a right to review the information that we have about you. If you find mistakes, you can ask us to correct them. You have a right to file a complaint if you feel that your privacy rights have been violated.

If you would like a copy of our privacy policy, our agency staff will provide one.

\_\_\_\_\_  
SIGNATURE OF CLIENT OR GUARDIAN

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE OF AGENCY WITNESS

\_\_\_\_\_  
DATE

# Privacy Policy for Huckleberry House (CSB Specific)

## What this Policy Covers.

1. This document describes the privacy policy and practices of Huckleberry House Transitional Living Program. Our main office is at 1421 Hamlet Street.
2. This policy covers the collection, use, and maintenance of protected personal information for clients of the Huckleberry House Transitional Living Program, as an agency affiliated with the Community Shelter Board (CSB).
3. Protected Personal Information (PPI) is any personal information we maintain about a client that:
  - a. allows identification of an individual directly or indirectly;
  - b. can be manipulated by a reasonably foreseeable method to identify a specific individual; or
  - c. can be linked with other available information to identify a specific client.
4. We adopted this policy because the Department of Housing and Urban Development issued standards for Homeless Management Information Systems. We intend our policy and practices to be consistent with those standards. See 69 Federal Register 45888 (July 30, 2004).
5. This policy informs our clients, our staff, and others how we process personal information. We follow the policy and practices described in this privacy policy.
6. We may amend our policy or practices at any time. Amendments may affect PPI that we obtained before the effective date of the amendment.
7. We give a written copy of this privacy policy to any individual who asks for it.
8. We maintain a copy of this policy on our website at [www.huckhouse.org](http://www.huckhouse.org)

## How and Why We Collect PPI.

1. We collect PPI only when appropriate to provide services or for another specific purpose of our organization or when required by law. We may collect information for these purposes:
  - a. to provide individual case management;
  - b. to produce aggregate-level reports regarding use of services;
  - c. to track individual program-level outcomes;
  - d. to identify unfilled service needs and plan for the provision of new services;
  - e. to conduct research for consulting and/or educational purposes; and
  - f. to accomplish any and all other purposes deemed appropriate by CSB.
2. We only use lawful and fair means to collect PPI.
3. We normally collect with the knowledge or consent of our clients. If you seek our assistance and provide us with PPI, we assume that you consent to the collection of information described in this policy.
4. We may also receive PPI about you from:

Amethyst		HandsOn Central Ohio
Equitas Health	Access Ohio	CMHA
Community Housing Network	Gladden Community House	Homeless Families Foundation
Southeast, Inc.	Faith Mission/Faith Housing	Maryhaven
Huckleberry House	The Salvation Army	

5. We post a sign at our intake desk or other location explaining the reasons we ask for PPI. The sign says:

We collect information about homeless individuals from agencies for reasons that are discussed in our privacy policy. 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 individuals, and to better understand the needs of homeless individuals. We only collect information that we consider to be appropriate. If you would like to see our privacy policy, our staff will provide you with a copy.

### **How We Use and Disclose PPI.**

1. We use or disclose PPI for activities described in this part of the policy. We may or may not make any of these uses or disclosures of your PPI. We assume that you consent to the use or disclosure of your PPI for the purposes described below and for other uses and disclosures that we determine to be compatible with these uses or disclosures:
- a. to provide or coordinate services to individuals;
  - b. for functions related to payment or reimbursement for services;
  - c. to carry out administrative functions such as legal, audits, personnel, oversight and management functions;
  - d. to create de-identified (anonymous) information;
  - e. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law;
  - f. to avert a serious threat to health or safety if:
    - i. we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and
    - ii. the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.
  - g. to report about an individual we reasonably believe to be a victim of abuse, neglect or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence in any of the following three circumstances:
    - i. where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law;
    - ii. if the individual agrees to the disclosure; or
    - iii. to the extent that the disclosure is expressly authorized by statute or regulation and either of the following are applicable:
      - A. we believe the disclosure is necessary to prevent serious harm to the individual or other potential victims; or
      - B. if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and

adversely affected by waiting until the individual is able to agree to the disclosure;

when we make a permitted disclosure about a victim of abuse neglect or domestic violence, we will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:

- (i) we, in the exercise of professional judgment, believe informing the individual would place the individual at risk of serious harm; or
  - (ii) we would be informing a personal representative (such as a family member or friend), and we reasonably believe the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interests of the individual as we determine in the exercise of our professional judgment.
- h. to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under any of these circumstances:
- i. in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena;
  - ii. if the law enforcement official makes a written request for PPI that:
    - A. is signed by a supervisory official of the law enforcement agency seeking the PPI;
    - B. states that the information is relevant and material to a legitimate law enforcement investigation;
    - C. identifies the PPI sought;
    - D. is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and
    - E. states that de-identified information could not be used to accomplish the purpose of the disclosure.
  - iii. if we believe in good faith that the PPI constitutes evidence of criminal conduct that occurred on our premises;
  - iv. in response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, social security number and distinguishing physical characteristics; or
  - v. if:
    - A. the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others); and
    - B. the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.
- i. to comply with government reporting obligations for HMIS and for oversight of compliance with HMIS requirements.
- j. to third parties for the following purposes:
- i. to permit other systems of care to conduct data matches (i.e., to determine if you are also utilizing services from such other systems of care); and

- ii. to permit third party research firms and/or evaluators to perform research and evaluation services in connection with the programs administered by CSB and the other agencies;

provided that before PPI is disclosed under this subsection, the third party that will receive such PPI and use it as permitted above must first execute a Data Use & Disclosure Agreement requiring such third party to comply with all applicable laws and regulations, including the privacy standards and disclosure provisions contained in the Department of Housing and Urban Development Homeless Management Information Systems; Data and Technical Standards Final Notice (see 69 Federal Register 45888 (July 30, 2004)), which such standards and provisions are reflected herein.

2. Before we make any use or disclosure of your PPI that is not described here, we seek your consent first.

### **How to Inspect and Correct PPI.**

1. You may inspect and have a copy of your PPI that we maintain. We will offer to explain any information that you may not understand.
2. We will consider a request from you for correction of inaccurate or incomplete PPI that we maintain about you. If we agree that the information is inaccurate or incomplete, we may delete it or we may choose to mark it as inaccurate or incomplete and to supplement it with additional information.
3. We may deny your request for inspection or copying of PPI if:
  - a. the information was compiled in reasonable anticipation of litigation or comparable proceedings;
  - b. the information is about another individual (other than a health care provider or homeless provider);
  - c. the information was obtained under a promise of confidentiality (other than a promise from a health care provider or homeless provider) and if the disclosure would reveal the source of the information; or
  - d. disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
4. If we deny a request for access or correction, we will explain the reason for the denial. We will also include, as part of the PPI that we maintain, documentation of the request and the reason for the denial.
5. We may reject repeated or harassing requests for access to or correction of PPI.

### **Data Quality.**

1. We collect only PPI that is relevant to the purposes for which we plan to use it. To the extent necessary for those purposes, we seek to maintain only PPI that is accurate, complete and timely.
2. We are developing and implementing a plan to dispose of PPI not in current use seven years after the information was created or last changed. As an alternative to disposal, we may choose to remove identifiers from the PPI.
3. We may keep information for a longer period if required to do so by an applicable statute, regulation, contract or other requirement.

### **Complaints and Accountability.**

1. We accept and consider questions or complaints about our privacy and security policies and practices.
2. All members of our staff (including employees, volunteers, affiliates, contractors and associates) are required to comply with this privacy policy. Each staff member must receive and acknowledge receipt of a copy of this privacy policy.

## **Agency Privacy Posting – (CSB Specific)**

### **Huckleberry House**

**We collect personal information directly from you for reasons that are discussed in our privacy policy. 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 individuals, and to better understand the needs of homeless individuals. We only collect information that we consider to be appropriate. If you would like to see our privacy policy, our staff will provide you with a copy.**