



Client Confidentiality & HMIS Training

Northern Nevada Continuum of Care

12-16-2021

Introductions



HomeBase has been working with Continuums of Care and homeless service providers throughout the country for three decades on eradicating homelessness.



We help CoCs design and implement Housing First, Coordinated Entry, and other major system changes.

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Today's Agenda:

- Introduction: New Policies and Procedures
- HMIS De-Identified Profiles
- De-Identified Client Key
- Process
- DV Client Privacy, Confidentiality, and Safety

Introduction: New Policies and Procedures

New Policies & Procedures: Intake & Data for DV Clients

What is the same?

- Immediate referral to DV survivor access point
- DV access points can refer to other access points if the client cannot be accommodated by the DV system

What is new:

- DV survivors can have intake done at their initial point of access (any CE agency)
- Agencies should plan to conduct intake for any DV client
- New procedures for doing this

Overview of New Procedures

No more comparable database for DV clients:

- All agencies will use de-identified HMIS profiles



Each agency must know how to:

- Create de-identified profiles
- Track client's information in the De-Identified Client Key

Why de-identified profiles?

HUD and VAWA regulations prohibit any PII of DV clients from being entered into HMIS.

- Too many people and agencies have access to HMIS, which puts DV clients at risk if their PII is in HMIS.

Instead, DV clients are entered into HMIS with a “de-identified” profile.

- Their PII (for purposes of contacting the DV client for a housing match referral) is stored separately (De-Identified Client Key).

This allows all agencies to conduct intake for DV clients while also helping to protect that DV client's information.

More information:

The end of the training will include a brief overview of privacy and confidentiality considerations for DV clients that all providers, staff, etc., must know and abide by as a part of Coordinated Entry.

HMIS De-Identified Profiles


Creating the De-Identified Profile

Anonymous Bb1e8552c

PROFILEHISTORYSERVICESPROGRAMSASSESSMENTSFILESNOTESCONTACTLOCATIONREFERRALS

CLIENT PROFILE

Social Security Number	XXX - XX - XXXX ?	
Quality of SSN	Client refused	
Last Name	Bb1e8552c	
First Name	Anonymous	
Quality of Name	Client refused	
Quality of DOB	Approximate or partial DOB reported	
Date of Birth	01/01/1970	Adult. Age: 51



UNIQUE IDENTIFIER
BB1E8552C ⓘ

Creating the De-Identified Profile

1. Enter the SSN as all 0s;
2. Set the SSN Data Quality field to Client Refused;
3. Enter the client's DOB as 01/01/(year of birth);
4. Set the DOB Data Quality field to Approximate or Partial DOB Reported;
5. Enter the client's First Name as Anonymous;
6. Enter the client's Last Name as Client;
7. Enter the Name Data Quality field to Client Refused;
8. After saving the profile, a Unique Identifier will be added to the client. Go back and change the client's Last Name to their Unique ID
9. Save Changes

Release of Information

- Here is a link to the ROI form to review with clients:
 - https://nvcmis.bitfocus.com/wp-content/uploads/2020/01/Nevada-ROI-v5_Updated-January-2020.pdf
- If at any point a client refuses consent to be in HMIS, the form to be filled out is also here:
 - <https://nvcmis.bitfocus.com/wp-content/uploads/2016/04/Nevada-Revocation-of-Consent.pdf>
- *As a reminder, ROIs must be completed for every client added to the system, including minors. A parent or guardian must sign the ROI on their behalf before they are added to the system. Minors in households of DV clients must be de-identified as well.*








Final De-Identified Profile

Once the ROI form is filled out, the client's ROI should be set to expire as of that day, and the client's profile should be de-identified as follows:

1. Change the SSN to all 0s;
2. Change the SSN Data Quality field to Client Refused;
3. Change the client's DOB to 01/01/(year of birth);
4. Change the DOB Data Quality field to Approximate or Partial DOB Reported;
5. Change the client's First Name to Anonymous;
6. Change the client's Last Name to his/her Unique ID;
7. Change the Name Data Quality field to Client Refused;
8. If other agencies have been working with the client, inform them (by emailing the identified Agency Lead) that the client requested that their info be de-identified;
9. **Remove the ROI and update Permission to NO** - while being logged in under the agency who is requesting the de-identification
10. Save the changes

Crisis > SATT

If you believe an individual is in crisis, you should complete the SATT with the client. It captures information such as number of adults and children in the household, where the client slept on the previous night, and whether they're in need of shelter (captures any potential unmet need).

NN SATT	
Assessment Date	12/08/2021 
Assessment Location	Select 
Assessment Type	Select 
Assessment Level	Crisis Needs Assessment 
Veteran Status	Select 
1. BASIC INFORMATION	
Adults in Household	1
Children in Household	1
Total Household Members	2
Where did you sleep last night?	Streets/Outdoors 
Do you have a place to sleep tonight?	No 
What's the best way for us to safely contact you or leave you a message so that we can help you access housing resources that may be available to you?	phone

SATT DV Questions

The SATT also includes the following questions related to DV:

2. SAFETY NEEDS

Are you currently residing with, or trying to leave, a family member, intimate partner, or someone who threatens you, makes you feel fearful, or forces you to do something against your will?



Do you want services that are specifically geared to help people who've experienced violence from a family member or an intimate partner, and do you need a safe place to stay?



Interviewer: Document your next steps for this client

3. APPROPRIATE ACTION(S)

****CLIENT SAFETY IS AT RISK - SAVE THE SATT AND POSSIBLY REDIRECT TO DOMESTIC VIOLENCE HOTLINE.**

RECOMMEND: CHAT FOR INDIVIDUALS

Resources for clients

Once you complete and save the SATT, it will provide you with resources you can share with the client on the eligibility determination screen:

PROGRAM ELIGIBILITY DETERMINATION

If appropriate, refer the client to Emergency Shelter:

Women and Family Emergency Shelter
Our Place
605 S. 21st Street, Sparks NV 89431
Phone: 775-327-7501

Single Adults and Couples Emergency Shelter
Nevada Cares Campus
1800 Threlkel St., Reno, NV, 89512
Phone: 775-329-4141

Domestic Violence Emergency Shelters
Safe Embrace
220 S Rock Blvd Suite 7, Reno, NV 89502
Phone: (775) 322-3466
Email: info@safeembrace.org

Domestic Violence Resource Center (DVRC)
1735 Vassar St, Reno, NV 89502
Phone: (775) 329-4150
Email: info@domesticviolenceresourcecenter.org

De-Identified Client Key

What is the “Client Key”?

Separate list that tracks DV clients' PII outside of HMIS to protect client safety.



Connected to HMIS profile via the “HMIS Unique Identifier”.

Create de-identified profile in HMIS



Transfer this unique identifier to the Client Key



Enter client's PII into the Client Key (and not into HMIS)

What goes on the Client Key?

- 1 HMIS unique identifier
- 2 Name
- 3 Phone number
- 4 Individual adult vs. family (and what size)

Process for Using the De-Identified Client Key

Format, Storage, Passwords

Format:

- The Key must be in the format of a locked (password protected) Excel file.

Storage:

- On a locked computer in a locked office at the agency.
 - On a HIPAA compliant server is allowable, though not preferred.
- The Key must *not* be stored online in any format.

Passwords:

- For Client Key Excel file and the Computer
- Must be complex passwords.
- Must be changed semi-annually and any time there is turnover of staff accessing the list.

Who gets access?

Client Key and passwords must only be accessible to **1 primary staff person** and **1 backup staff person**.

- Should the primary staff person leave the agency, the password must be immediately changed, and another backup staff member shall be trained and given as-needed access.
- If another staff member conducts the initial intake assessment, the client's information must be given to the primary staff member for entry onto the Key.

All staff members with access to the Key (maximum of 2 per agency) must:

- Have received Confidentiality, Privacy, and DV Considerations training through the Coordinated Entry System lead or another approved form (e.g., a HUD training online).
- Sign the *Individual Staff Access to De-Identified Client Key Agreement*.

The Agency housing the De-Identified Client Key must sign the *Agency De-Identified Client Key Agreement*.

Sharing Information & Referrals

Agencies and staff with access must not share the Key, the Key's password, or any information on the Key with any other staff, agency, or person except for the CES Matchmaker during the referral process.

When the individual's Unique Identifier is eligible for a CES Referral:
(1) The CES Matchmaker will contact the agency to determine whether the person is part of a family or an individual to make an appropriate referral and (2) will ask for other PII from the agency to make the referral.

This is the only time that the information on the Key should be shared.

Deleting Information

In the case of a referral to RRH or PSH, after a move-in date has been decided and entered, the client should be deleted from the De-Identified Client Key.

If a client self-resolves or is provided with another source of stable housing, the agency should check-in with the client about if they want to stay on the list for another option to arise. If they want to be removed from the list, they should be exited from HMIS and deleted from the Key.

DV Client Privacy, Confidentiality, and Safety

Definitions: Domestic Violence

For the purpose of Coordinated Entry, the Northern Nevada CoC defines domestic violence for an individual as:

- dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual
- that has either taken place within the individual's primary nighttime residence, or has made the individual afraid to return to their primary nighttime residence;
- *and* the individual has no other residence;
- *and* lacks the resources or support network to obtain other permanent housing.

Definitions: Human Trafficking

According to HUD, DV includes victims of human trafficking. For the purpose of Coordinated Entry, the Northern Nevada CoC defines Human Trafficking for an individual as:

- exploitation of a person for the purpose of compelled labor or commercial sex acts
- that has either taken place within the individual's primary nighttime residence, or made the individual afraid to return to their primary nighttime residence;
- *and* the individual has no other residence;
- *or* the individual lacks the resources or support network to obtain other permanent housing.

Considerations...



Some Victim Service Providers (VSP) in the community have a more specific definition of Domestic Violence that impacts their eligibility criteria.



For any client identifying as fleeing or a survivor of DV, the provider must uphold all privacy and confidentiality guidelines and follow all policies and procedures related to DV survivors outlined in the Coordinated Entry Policies and Procedures.

VAWA



The Violence Against Women Act (VAWA) provides certain protections for victims of domestic violence, dating violence, sexual assault, or stalking, as well as to those who are affiliated with a victim.



VAWA protections are not limited only to women but are available equally to all qualifying individuals regardless of sex, sexual orientation, or gender identity.



VAWA protections explicitly state that a program participant cannot be discriminated against on the basis of being a survivor of violence when they are otherwise eligible for services.



Participants may not be denied or terminated from housing services solely based on their protected class. CoC-funded providers are among those responsible for implementing these protections.

Emergency Transfer

One of VAWA's protections is the Emergency Transfer:

- Allows survivors to move to another safe and available unit if they face an imminent threat of harm by remaining in their current unit.
- If a participant requests and is eligible for an Emergency Transfer, the housing provider should first attempt to move the participant to another unit within their program.
- If this is not possible, the participant will be prioritized for the next available and appropriate housing opening through Coordinated Entry.

Key Rules, Regulations, and Privacy Fundamentals

- [HUD HMIS Data Technical Standards](#)
 - Establishes standards for collecting, using, and disclosing data in HMIS
- [Violence Against Women Act](#) (VAWA), [Family Violence Prevention Services Act](#) (FVPSA), and [Victims of Crime Act](#) (VOCA)
 - VAWA contains strong, legally codified confidentiality provisions that limit Victim Service Providers from sharing, disclosing, or revealing personally identifying information (PII) into shared databases like HMIS
- [Serving survivors through Coordinated Entry](#)
 - Safe and confidential access to the CE process
 - Safety planning
 - Emergency transfer services
 - Trauma-informed care
- [Health Insurance Portability and Accountability Act](#) (HIPAA)
 - Governs how health care providers, health care clearinghouses, and health plans disclose data
- [Privacy Act \(5 U.S.C. 552a\)](#)
 - Requires written consent to disclose client records

Resources

- [HUD CE Management and Data Guide \(See chapter 2\)](#)
- [HUD's VAWA Notice](#)
- [Privacy and DV Survivors](#)
- [National Network to End Domestic Violence \(NNEDV\) CE Confidentiality Requirements in Practice](#)
- [Coordinated Entry \(CE\) and Victim Service Providers FAQ](#). This FAQ responses to questions about the coordinated entry process and how it relates to victim service providers for CoCs.
- [Coordinated Entry Process FAQ: A Resource for Domestic Service Providers](#). This FAQ has been developed by the Domestic Violence and Housing Technical Assistance Consortium to respond to questions received from domestic violence service providers regarding CE.
- [NASH: Safety and Coordinated Entry with Domestic Violence Survivors](#). Presentation from the National Alliance for Safe Housing that reviews the federal requirements for coordinated entry related to serving survivors of domestic violence.
- [DVHTAC Presentation: Coordinated Entry, What DV and SA Programs Need to Know](#). Presentation that reviews: the federal requirements for CES related to serving survivors of domestic violence; the types of CE, including parallel DV CE; shares resources; and discusses how to ensure safety and confidentiality for survivors accessing CE.

Questions?

