The Community Shelter Board recognizes the primacy of client needs in the design and management of the Homeless Management Information System (HMIS). These needs include both the need to continually improve and maintain the quality of homeless and housing services with the goal of eliminating homelessness in Columbus and Franklin County, as well as the need to maintain client confidentiality and treat the personal data of clients with respect and care.

As the guardians entrusted with this personal data, HMIS users have a moral and a legal obligation to ensure that the data is being collected, accessed, and used appropriately. It is also the responsibility of each user to ensure that client data is only used to the ends for which it was collected, ends that have been made explicit to clients and are consistent with the mission of the Community Shelter Board to assist families and individuals in Central Ohio to resolve their housing crisis. Proper user training, adherence to the HMIS Policies and Procedures Manual, and a clear understanding of client confidentiality are vital to achieving these goals.

Relevant points regarding client confidentiality include:

- Each client must be made aware of the Provider’s privacy policy (the “Privacy Policy”) and its content regarding the collection, use and maintenance of such client’s protected personal information.
- The Privacy Policy must be provided to the client upon request and a notice indicating that such Privacy Policy is available must be posted at the Provider’s intake desk and on the Provider’s website, if applicable.
- Each client must be presented with the Client Acknowledgement for Electronic Data Collection form.
- Clients have a right to inspect, copy, and request changes in their HMIS records.
- HMIS users may not share client data with individuals or agencies that have not entered into a Master Provider Agreement or an HMIS Agency Agreement with CSB without obtaining written permission from that client.
- Excluding information shared in the client profile and other sections as agreed by the Continuum of Care, HMIS users may not share client data with any Connecting Agency, unless there is a separate Data Sharing Agreement between the Connecting Agencies.
- HMIS users will maintain HMIS data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities, including taking necessary precautions when working remotely.
- Any HMIS user found to be in violation of the HMIS Policies and Procedures, or the points of client confidentiality in this User Agreement, may be denied access to the HMIS.

I affirm the following:

1) I have received training in how to use the HMIS.
2) I have read and will abide by all policies and procedures in the HMIS Policies and Procedures Manual and have adequate HMIS training and knowledge to enter and extract data.
3) I will maintain the confidentiality of client data in the HMIS as outlined above and in the HMIS Policies and Procedures Manual.
4) I will only collect, enter and extract data in the HMIS relevant to the delivery of services to people in housing crisis in Columbus and Franklin County.
5) If I have access to an HMIS reporting license, I will maintain the confidentiality of client data by NOT attempting to or producing reports and data downloads using any other Connecting Agency programs available through HMIS and the reporting software. Any user found to be in violation of this clause will have a lifetime denial of access to HMIS and criminal charges may be brought against the user.