



HMIS Data Sharing Policy

Partner Agency Name

Westchester County Department of Social Services

HMIS Lead Agency Name

PURPOSE

This policy describes the scope of client data sharing within the Westchester County Homeless Management Information System (HMIS).

BACKGROUND

As described in the HMIS Agency Partner Agreement (APA), each partner agency enters into agreement with the HMIS Lead Agency as designated by the Westchester County Continuum of Care Partnership for the Homeless (CoC). This agreement permits client data to be shared with the Lead Agency for administrative purposes. As more fully described in the HMIS Privacy Policy, this agreement permits the Lead Agency to use and disclose data, including protected personal information, collected by the partner agency.

Furthermore, this agreement permits inter-agency client data sharing for purposes related to effective coordination and provision of services.

DATA SHARING

The partner agency must abide specifically by federal and state confidentiality regulations and laws that pertain to PPI (see APA). If inter-agency data sharing is permitted, the partner agency must implement and ensure compliance with procedures to obtain client consent. The following guidelines are meant to clarify how information may be disclosed and used between partner agencies.

Information shared and editable between agencies may include:

- Personally Identifiable Information (PII): Name; Date of Birth, Social Security Number and Gender; Race and Ethnicity;
- Household and Contact Information: Household Name, Family Members and Relationships, and Address.

Information shared on a read-only basis between agencies may include:

- Program Information: Program Name, Program Type, Organization Name, Entry Date and Exit Date;
- Program Assessments: Universal Data; Income and Non-Cash Benefits; Barriers/Disabilities, and Domestic Violence Experience.
- Transactions: Services, Goals, Referrals, Case Notes and Facility Stays.



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Client Release of Information Procedure

Partner agency users have the ability to set and enforce the HMIS General ROI on the Client Basic Information form by selecting from:

- **Restrict to Organization** will allow only the partner agency to view and access the client record; or,
- **Share with Continuum of Care** allows all partner agencies to view the client's personally identifiable information. Additionally, where sharing is permitted between partner agencies, this preference allows those partner agencies to view program information and transactions.

When a client opts to not share program information or transactions, partner agency users can restrict access to those elements respectively in the system.

The Lead Agency will never disclose any client data to a third party, unless required by law or otherwise permitted by the HMIS Privacy Policy.

Inter-Agency Data Sharing Procedure

The Lead Agency will set and enforce each partner agency's data sharing preference in accordance with the HMIS Agency Participation Agreement. If the partner agency wishes to restrict sharing to specific agencies within the CoC or none at all, the partner agency must submit documentation to the Lead Agency signed by its executive officers.

The Lead Agency will never grant agencies access to client data outside of the policy and procedures described above.