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WASHTENAW COUNTY SERVICEPOINT
NOTICE OF PRIVACY POLICIES AND PROCEDURES FOR
The Salvation Army/ Housing Access for Washtenaw County



What is the purpose of this notice? The information we collect about you and your household members is stored in an electronic record-keeping system called ServicePoint. This notice describes the type of information we collect in ServicePoint, how we use and secure this information, and your rights and responsibilities regarding this information.

What information do we collect? There are three different types of personal information we collect and enter into ServicePoint.

- **Client Profile Information.** The information collected for your profile is limited to your name, partial social security number, year of birth, and gender. Your profile and the profiles of any minor dependents receiving services with you may be shared with other agencies using ServicePoint to avoid duplication of your records.
- **Demographic Information.** Demographic information includes date of birth, ethnicity, race, and marital status. Demographic information is entered into ServicePoint and is used for confidential reporting and research purposes. It is not shared with other agencies unless you sign a ServicePoint Release of Information.
- **Assessment Information.** Other types of information we may collect include your educational level, employment status, housing and homeless history, last city and zip of residence, military service history, progress notes, benefits, services, and referrals. This information is entered into ServicePoint. It is not shared with other agencies unless you sign a ServicePoint Release of Information.
- **Service Transactions.** Information about services that are provided to you by this agency as well as referrals made to other agencies is also entered into ServicePoint. It is not shared with other agencies unless you sign a ServicePoint Release of Information.
- **Protected Health Information.** In addition, we may collect health and disability information about you and your minor dependents. However, information about your health, medical needs, mental health, substance abuse, and domestic violence history will remain confidential and protected. It is not shared with other agencies in unless you sign a ServicePoint Release of Information.

Why do we collect this information?

- To understand the characteristics and needs of people we serve
- For delivery and coordination of housing and services
- For administrative and management functions
- For research and to create statistical reports without identifying clients
- To create reports required by organizations who fund our agency
- For necessary disclosures as required by law (e.g. in case of medical emergency, to reduce or prevent a health and safety threat, report abuse or neglect, and in response to a court order)

Uses and disclosures for academic research purposes. Washtenaw County periodically participates in academic research with local and nationwide partners. Periodically, protected personal information from the HMIS is pulled for data match purposes of the research project. The data pulled will be used within the boundaries set by an approved research agreement (Institutional Review Board (IRB) agreements) ONLY.

How is personal information protected? We treat personal information securely and confidentially. Access to all the information stored in ServicePoint is limited to those who need access to provide services. The people with access to the system receive training in privacy protection and must comply with ServicePoint user policies and applicable laws. We maintain physical, electronic, and procedural safeguards to protect personal information against unauthorized use and disclosure. Identifying data, such as your name, date of birth, and SSN are removed so that you will remain anonymous on any reports released to local, state or federal agencies.

What other agencies have access to personal information? Systems Administrators at the Michigan Coalition Against Homelessness (MCAH) and the Washtenaw County Office of Community and Economic Development manage the ServicePoint system. They have access to all ServicePoint records because they provide statistical reports without identifying client information and provide customer support to agency staff using ServicePoint.

In addition, ServicePoint is used by many housing and service delivery agencies in the state of Michigan. A complete list of these agencies is posted on the MCAH website at www.mihomeless.org. This list is updated as participating agencies change. The following agencies in Washtenaw County use ServicePoint:

- Ann Arbor Housing Commission
- Avalon Housing Inc.- Washtenaw County
- Catholic Social Services- Washtenaw County MPRI
- Department of Health and Human Services- Washtenaw County
- Interfaith Hospitality Network- Washtenaw County
- Michigan Ability Partners (MAP)- Washtenaw County
- Oakland Livingston Human Service Agency (OLSHA) Support Services for Veterans Families (SSVF) Program
- Ozone House* Exempt from sharing in HMIS
- POWER, Inc
- Saint Joseph Mercy Hospital Social Work and Case Management Department
- The Salvation Army of Washtenaw County
- Shelter Association of Washtenaw County
- S.O.S Community Services- Washtenaw County
- University of Michigan Complex Care Management
- Veteran Administration Ann Arbor Health System
- Washtenaw County Community Mental Health (WC CMH)
- Washtenaw County Office of Community and Economic Development
- Washtenaw County Continuum of Care
- Washtenaw Housing Alliance
- Ypsilanti Housing Commission

Is there a way to keep my personal information out of ServicePoint? If you wish, your case worker may “close” your profile. If you complete a Closed Profile Request, your profile will be closed and no information about you will be shared with other agencies using ServicePoint. If you wish to have your profile closed, ask your case worker for a Closed Profile Request Form. NOTE: If you receive services at more than one agency, your profile will remain shared with those agencies. Even if your profile is closed, your information will still be entered into ServicePoint and will be visible to ServicePoint system administrators.

What are your rights? As a client receiving services from an agency participating in ServicePoint, you have the following rights:

- **Access to your information.** You have the right to view and request corrections to your ServicePoint record. At your request, we will prepare a report of your records or assist you in viewing them within three business days. If we believe your existing record is accurate and complete, we may make a note of your correction request rather than changing the information.

- **Refusal to share.** You have the right to refuse to share your profile and other information we may collect about you and your minor dependents. You cannot be denied services that you would otherwise qualify for if you choose NOT to share your profile or other information. However, sharing your profile and other information may improve service coordination and reduce the amount of information that you need to provide to the other agencies from which you receive services.

What are your responsibilities? It is your responsibility to notify us if you believe that your information in ServicePoint is inaccurate. It is also your responsibility to contact all agencies where you have received services and complete a Closed Profile Request if you do not wish to have your information shared with other service providers.

Accountability/Complaints. If you have questions or concerns about your privacy rights in this notice, please contact our agency first:

The Salvation Army/Housing Access for Washtenaw County
Director of Programs and Operations; Ashlee Cunningham
100 Arbana Drive
Ann Arbor, MI 48103
734-961-1999

You may also request a WCHMIS grievance form from our agency and submit it to:
Washtenaw County Office of Community & Economic Development (OCED)
Attn: HMIS System Administrator
415 West Michigan Ave., Suite 2200
Ypsilanti, MI 48197

The effective date of this notice is **4/1/2016**. This replaces all prior WCHMIS privacy notices issued by our agency. We reserve the right to change our policy. For an updated copy of our policy, please contact our agency or visit www.ewashtenaw.org/oced.