

## ***Data Security; Client Notice, Consent, and Release of Information***

There are two levels of data privacy controlled directly by your clients through their response to the Client Notice and Consent and Release of Information form. The first— the Notice and Consent—applies to all agencies. The second—the Release of Information— only applies to agencies sharing data with other agencies. Domestic Violence, Youth, HIV/AIDS and HIPAA covered agencies do not share data with other agencies.

Note: You should obtain consent for each person you are entering into ServicePoint since each person has their own record in the system. You should collect information directly from each person 18 and older, and get permission from parents or guardians (if available) about their children's data-sharing.

### **1) Client Notice and Consent:**

All agencies need to know from clients if they consent to entering their name into the system. In most cases, this is determined by providing clients with the HMIS Notice and Consent form and answering client questions about the system. If they are comfortable putting their identifiable data in the system they sign the form. To date, the majority of clients have been comfortable having their data identified in the system.

If the client is opposed to even Wilder seeing the data (does not want any identifiable information on them in the system and does not sign form), you can enter them as an anonymous client.

On the first ClientPoint screen, you would enter everything about them except their name and social security number. Instead of clicking on Add/Find client, you would instead push "Add as anonymous."

The system assigns the client an anonymous name. The system automatically assigns the record the first name Anonymous and a randomly generated string for the last name (ex: WX4356U). You will need to write this down in so you can look up the client again later.

### **2) Release of Information**

Client Release of Information only applies to agencies wishing to share data with other service providers using ServicePoint. General, this does NOT include Domestic Violence, Youth or HIPAA covered agencies.

Agencies sharing data need to provide clients with an HMIS Release of Information form and answer any questions the client has about it. The form allows clients to choose what type of data they are comfortable sharing, and to indicate which of up to 10 agencies (that you pre-select and have Wilder set-up) they are comfortable sharing data with. Follow client preferences for sharing data using the steps below:

- A) **If the client does not want to share data** with any agencies on your list:
  - a. Click on the release of information button (ROI) and select "no." The system will automatically not share the data with others.
  - b. Click on the orange Security padlock button, uncheck the boxes next to the agency names, and save. The box should say at the top that the record is closed.
  - c. **NEW:** You also need to go to all household members' records and close security for them.

**B) If the client is comfortable sharing at least some data with other service providers, follow the options they specify on their release forms:**

- a. **If the client wants to share only their name and basic demographics with all agencies on your list**, fill out the information in the orange ROI button and select “Yes.” This will automatically open their information to the agencies you have selected until the end date for the ROI (one year or less).
- b. **If the client only wants to share with some of the agencies on your list**, after completing the ROI button you will need to open the orange security padlock button and un-check the agencies they don’t want to share with. Then save your changes. The box should say “Closed with exceptions” at the top and the agencies the client is willing to share data with should have checks in them.
- c. **If the client wants to share more than just their name and basic demographics**, you will need to open the padlock for these sections of information. In the Assessment or Profile sections, you can either open the padlock for the entire Assessment, or just particular data elements by using the “H” or the padlock on the sub-assessment. In Service Transactions, you can only open the services after you save the service by clicking on the padlock in that section. (Sensitive information, including domestic violence information, disabilities, and medical history generally should not be shared in the system.)

Note that if the client you are serving already existed in the system and is shared with another agency, if you try to close their record you will get a message reading: “Warning: this client is shared with other providers. This client should not be restricted except in extreme circumstances.” (If you feel you must close it, look at the history (H) or the Caseworkers section to see which provider may also have entered some information and consult with them before closing.) Please consult with Wilder if you have any questions regarding data security in such a case.

**Other security issues:**

- 1) At times, you may have questions for Wilder about what you have entered in the system for a particular client. Please do not email complete client names. You can email partial names (ex. First initial and last name, or partial first and partial last name), along with some other identifying information such as race. It is often helpful to provide client ID number located at the top of the screen near their name. It is safe to give Wilder complete client names over the phone.
- 2) Do not share your password with other people in your agency.
- 3) Do not leave your computer if you have ServicePoint open. Log out first before leaving.