4/3/20

Michele, Brooke, Keleigh, Cynthia, Owen, Kathy

**COVID-19 Privacy Discussion**

A few things that get sent out together-

HUD’s situational guidance

CoC covid-19 privacy recommendations

Send out guidance to screening tool from CDC

Kathy- in a congregate setting, the reality is that everyone will know and it will be immediate. If we call and someone has symptoms and they are positive they might be mad because everyone starts blaming them. Currently they have a way to separate folks experiencing symptoms and are working with the local command center in North Adams.

Privacy notices should be posted at work stations and on the agency website. We have added a section in the privacy and security training doc to remind providers that their notice must state the policy may be amended at any time and the amendments may affect information obtained before the date of the change.

Michele has created a page of COVID-19 privacy guidance from the situations HUD sent and will update it with a recommendation to projects to post notice that PII may be disclosed if necessary

**Release of Information**

The ROI has been changed to now include three authorizations, one for coordinated access to housing, one for anonymous coordinated access to housing, and one for reporting to funders with explanations of what saying yes or no means. There is concern about saying yes to coordinated access and not reporting to funders- can this actually be true? We need to report to funders for everyone in the coordinated entry system now that data elements will be tied in HMIS.

Owen- DIAL/SELF uses a similar, slightly less complicated release-when someone says no, they’re being coded

Anonymized in HMIS- name and birthdate coded

Participation in any amount of CE requires entry to HMIS so they make two entries in HMIS for those who say yes to coordinated access and no to HMIS

One uses coded method and one not using it depending on what they indicated for the programs

Suggestion that we could keep the big no disclosure at the bottom, and add more info to the yes/no options- no, code my information, yes

What are people signing when they come into the shelter- is the Three County CoC release being signed? The CoC will communicate with shelters to find out their current practices/ROIs in use

Owen- to avoid an inadvertently conflicting answer, can we remove the second question and add a third box to the first option to anonymize?

Kathy- when we’re talking with people, putting all of the choices up top would be helpful.

Owen- two questions with three checkboxes each, one for an anonymized, one for yes and one for no

Keleigh- we should clarify the use of this particular release and change the order- reporting to funders should be before coordinated access.

Owen- our mandated reporting form says that we break confidentiality during a medical emergency

We did not get to the system performance measures or data quality in this call because there was plenty to talk about with the release of information and COVID-19 privacy concerns. We will be sending out a few documents together for providers:

HUD’s situational guidance

CoC covid-19 privacy recommendations

Guidance to screening clients at entry to shelters from CDC