

# Privacy Policy Notice

YMCA of Central Ohio

Shelter and Community Housing

Version 13.0

*Revised 2024*

## Brief Summary of Policy

This notice describes the privacy policy of the YMCA of Central Ohio (YMCA) Community Housing and Shelter Programs. The policy may be amended at any time. The YMCA collects personal information only when appropriate. The YMCA may use or disclose client information to other agencies providing the client services. The YMCA may also use or disclose it to comply with legal and other obligations. Unless otherwise stated by the client, it is assumed that the client agrees to allow the YMCA to collect information and to use or disclose it as described in this notice. Anyone may have a copy of the full notice.

### Your Rights

You may inspect personal information about you that we maintain.

You can ask staff to correct inaccurate or incomplete information.

You can ask us about our privacy policy or practices.

You have the right to get services even if you choose **NOT** to sign the Client Acknowledgement of Data Collection form.

You have the right to ask for information about who has seen your information.

### **Full Notice**

#### A. Purpose of policy

The privacy policy is intended to best serve your needs at the YMCA Community Housing and Shelter Programs through developing meaningful treatment plans, determining new or ongoing eligibility for services, and monitoring progress to ensure compliance with the terms of your housing and other services. In order to accomplish this task, the YMCA and the Community Shelter Board ("CSB") need to collect data and information about you and services received.

#### B. Use and protection of personal information

The YMCA collects information regarding clients and services accessed. The client will be asked for personal and family information and entered into a web based data collection system. The Columbus Homeless Management Information System (HMIS) helps the program maintain client records that consist of individual identifying information referred to as "protected personal information," or PPI. The YMCA is required to protect the privacy of client identifying information. Clients will be provided notice

about how, when, and why personal data will be used or disclosed. The YMCA will follow the privacy practices described in this Notice. The YMCA reserves the right to change the privacy practices and the terms of this Notice at any time.

The YMCA of Central Ohio Housing, Community Housing and Shelter Programs are affiliated with CSB. Authorized data and information gathered and prepared by the YMCA and CSB will be included in the HMIS database and shall be used by the YMCA, CSB and authorized agencies, to:

- Provide individual service coordination
- Produce aggregate-level reports regarding use of services
- Track program-level outcomes
- Identify unfilled service needs and plan for the provision of new services
- Allocate resources among agencies engaged in the provision of services
- Accomplish any and all other purposes deemed appropriate by CSB

#### C. Disposal and removal of PPI

Data not in use seven years after the PPI was created or last changed will be destroyed. Laptops that are to be decommissioned are processed with e-waste recyclers and we receive documentation of physical destruction for any drives that were in the computer. If the device is reissued to new staff, that laptop is reimaged back to factory state..

#### D. Security of PPI

- The YMCA has security measures in place regarding accessibility of client PPI. This includes:
  - The YMCA removes identifiers from PPI collected on agency computers. Staff who have access to this data have appropriate security measures in place on their computers, including password protection, 2-step verification, HMIS licensing, and application security and logging during data entry on HMIS.
  - Current client identifiers are removed from documents stored on computers and servers.
  - Hard copy PPI is supervised by staff. PPI is stored in areas with locked filing cabinets behind locked doors.
  - All HMIS data that is electronically transmitted over the internet is encrypted.
  - Any files that are stored via Google Drive are secured via 2 step verification with the Google Drive. Only active staff have access to your Drive files that have been given permissions.

#### E. YMCA Network Back-up and file recovery

- The YMCA Network is cloud based with our network provider. All data is stored continuously via the cloud and/or google apps. Data entered and stored in HMIS or BestNotes is stored on their program application.

#### F. Policy applicability

This policy applies to everyone in the YMCA Community Housing and Shelter Programs accessing services at any YMCA program.

#### G. What this policy covers:

This notice describes the privacy policy and practices of the YMCA Community Housing and Shelter Programs.

The policies and practices in this notice cover the processing and storage of protected personal information for clients of the YMCA Community Housing and Shelter programs as an agency affiliated with the Community Shelter Board (CSB).

#### H. What is protected personal information?

- Protected personal information (PPI) is any information we maintain about a client that:
  - Allows identification of an individual directly or indirectly;
  - Can be manipulated by a reasonably foreseeable method to identify a specific individual;OR
  - Can be linked with other available information to identify a specific client.
- Personally Identifiable Information or (PII) is information about a client that:
  - Could be used in conjunction to compromise their password or steal their identity.
  - Data such as: the name of your dog, or your lucky number, or your astrological sign.

#### I. Why did the YMCA of Central Ohio adopt this policy?

The policy was adopted to comply with the standards for HMIS issued by the U.S. Department of Housing and Urban Development. The YMCA's intention is to be consistent with policy and practices in accordance with standards set forth by the *69 Federal Register 45888 (July 30, 2004)*.

The Notice informs YMCA clients, staff, and others how and why personal information is processed and stored. With certain exceptions, we follow the policy and practices described in this privacy policy.

The YMCA may amend this notice and change the policy or practices at any time. Amendments may affect personal information obtained before the effective date of the amendment. A permanent documentation of changes to this document is kept on file.

A written copy of this notice is provided to anyone who asks and is available for review at any time. Clients are informed of this policy at the time personal information is being collected.

We maintain a copy of this policy on our website at: <https://ymcacolumbus.org/social-services/housing>

#### J. How and Why We Collect Personal Information

The YMCA collects personal information when appropriate to provide services or for other purposes identified by the organization or when required by law. The following reasons are why data is collected:

- To provide case management or coordinate services to clients;
- To produce aggregate-level reports regarding use of services;
- To track individual program-level outcomes;
- To locate other programs that may be able to assist clients for unfulfilled services needs and provision of new service;
- To comply with government reporting obligations for homeless information systems;
- To conduct research for consulting/education purpose;
- When required by law; *\*Periodic warrant checks are run on all residents to ensure the safety of the building and other residents.*
- The official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of

investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others); and

- To avert a serious threat to health or safety of client or others; disclosure of PPI or PII when required by law, for example, to a public health authority, if: (1) the YMCA, in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and (2) the sue or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat;
- For function related to payment or reimbursement for services;
- To create anonymous information that can be used for research and statistical purposes without identifying clients;
- To report abuse or if a person is reasonably believed to be a victim of abuse;
- Program planning;
- To determine eligibility for the program; and
- To accomplish any and all other purposes deemed appropriate by CSB.

Client consent will be requested prior to making use or disclosure of personal information as described below. The YMCA uses lawful and fair means to collect personal information. Personal information is collected with the knowledge and consent of YMCA clients (unless otherwise required by law). If you seek our assistance and provide us with PPI, we assume that you consent to the collection of information described in this policy.

**We may also receive PPI about you from HMIS participating agencies that have an agreement with CSB. A list of specific agencies is available upon request.**

Personal protected information examples:

Name  
Date of birth  
Former address  
Social Security number  
Disability status  
Employer

We post a sign at our intake desk or other locations explaining the reasons we ask for PPI. The sign says:

***We collect information about homeless individuals from agencies for reasons that are discussed in our privacy policy. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless individuals, and to better understand the needs of homeless individuals. We only collect information that we consider to be appropriate. If you would like to see our privacy policy, our staff will provide you with a copy.***

***The address or location of any housing of a resident would not be made public except when following State or Local laws regarding privacy and obligations of confidentiality. Should a warrant or subpoena be presented, the YMCA follows all applicable state and local laws.***

K. How data is collected

Clients are asked to sign a Client Acknowledgement for Data Collection at time of intake at the YMCA Community Housing and Shelter Programs. By signing this form, the client indicates an understanding that YMCA will enter the client into the HMIS system and access individual protected personal information from other agencies participating in HMIS.

L. How data is used

Data is used and disclosed for a variety of reports. The YMCA has a limited right to include some personal information for reports on homelessness and services needed by those who are homeless. Information that could be used to identify a client will never be used for these reports. The YMCA will not turn individual information over to a national database. Beyond use for reporting, the YMCA must have the client's written consent unless the law permits or requires the program to make use or disclosure without your consent. YMCA Staff who have access to this data are required to be licensed, have agreed to and signed a Code of Ethics, and a Confidentiality Agreement, and are trained in the collection, use, security, and privacy of this data.

The address or location of any housing of a resident would not be made public except when following State or Local laws regarding privacy and obligations of confidentiality. Should a warrant or subpoena be presented, the YMCA follows all applicable state and local laws.

M. Data sharing

Any agency or group participating in HMIS must have a signed agreement or release of information on file with the YMCA to request client personal information. Requests for shared information will be submitted to CSB for approval.

N. Inspection and correction of personal data

A client may inspect and have a copy of personal information maintained by the YMCA. Should the client have questions, YMCA staff is able to explain any information regarding collected data.

The YMCA will consider a written request from a client for correction of inaccurate or incomplete personal information. To review, obtain a copy, or ask for correction, please submit a written request to the Program Director Monday-Friday 8:00 a.m. to 5:00 p.m.

If the information is inaccurate or incomplete, the YMCA will create a written request emailed to the CSB regarding the data error. CSB will correct the data error.

Requests may be or copying of personal information may be denied if:

- The information was compiled in reasonable anticipation of litigation or comparable proceedings;
- The information is about another individual (other than a health care provider or homeless provider);
- The information was obtained under a promise or confidentiality (other than a promise from a health care provider or homeless provider) if the disclosure would reveal the source of the information; or
- Disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
- Inability to establish individual's identity

If a request is denied for access or correction, the YMCA will provide a written response explaining the reason for the denial. The YMCA documentation will be placed in the client file. Repeated or harassing requests for access or correction will be denied.

O. Data quality

The YMCA collects personal information that is relevant to the purposes for which it will be used. The YMCA will maintain only personal information that is accurate, complete, and timely. Staff who enter data have been trained and licensed to use HMIS. Data is entered as close to real time as possible, and maintained according to the YMCA's QA Plan that is available upon request.

P. Complaints and accountability

The YMCA accepts and considers questions or complaints about privacy and security policies and practices. If a client would like to file a complaint, please complete a Grievance Form located at the Front Desk.

All staff members are required to comply with this privacy policy and are notified of changes or updates that occur.

Q. Communication to clients

At the time of preliminary application, case management staff explains why personal information is collected. Service coordination staff will offer to review the privacy policy with the client and answer questions. The policy notice is also posted in common areas for review at any time and a copy is kept at the front desk for review.

If the client indicates a disability at the time of review, the YMCA staff will make reasonable accommodations on a case-by-case basis. See the YMCA Cultural Competency plan. All Service Coordination staff are familiar with community services and agencies to assist individuals requiring extra accommodations.

R. History of changes

The privacy policy is reviewed annually and any corrections or changes are updated on a new version.

S. Collecting Income Annually

At least annually, the YMCA will request third party documentation or, as a last resort, self-certification of income. Annual updates must occur within 30 days on the clients one year anniversary date.