



## Safe Harbors HMIS: Data Use Policy

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## Data Use Policy

### *Purpose*

The purpose of this policy is to specify how information collected by Safe Harbors will be shared or disclosed and under what conditions the information may be accessed. It categorizes the data that Safe Harbors staff will administer and indicates the controls to ensure data integrity as information is shared.

**This policy does not address client-identifying information, which is covered under Safe Harbors' Security, Privacy, and Data Disclosure Policies.**

### Definitions

**Affected Third Parties:** An affected third party is a person, vendor, agency or other entity to whom the record pertains or whose identity or personal information is included in a record that would be disclosed under a public disclosure request.

**Agency:** An organization working with Safe Harbors signing an Agency Partner Agreement thereby agreeing to follow Safe Harbors policies and procedures. The Agency Partner Agreement is in effect for all related programs within an agency.

**Agency Identified Information:** Information that identifies a specific agency with agency collected data.

**Aggregated Data:** This is data that is grouped, usually by program, but possibly across any dimension (e.g., time, county sub region, segments of client populations, etc.). This data type precludes exploration at a client-identified level because there is no client level data.

**Client:** A person who applies for or receives services from a Safe Harbors partner agency.

**Client-identifying Confidential Information:** Personal information that identifies a client, including protected health information, and that state or federal laws protect from improper disclosure or use.

**Client-level Information:** A set of data records that combined represent a single client. This type of information lends itself to more in-depth data analysis. All public client-level data is de-identified.**Data Types:** This delineates categories of de-identified information that Safe Harbors staff administers. This indicates the type of controls required for enforcing and maintaining security standards.

**De-identified:** A data set or report that removes all client-identifying confidential information, i.e., information that identifies the client by name, SSN or other unique identifier.

**Disclosure:** The release, transfer or provision for access to information outside Safe Harbors.

**HIPAA:** The Health Insurance Portability and Accountability Act of 1996, 42 USC 1320d et seq.

**HMIS:** Homeless Management Information System — a web based computer system managed by Safe Harbors staff that collects client identified confidential information with services received and outcomes achieved by the clients.

**Internal Data:** De-identified information scheduled, but not approved by the Public Disclosure Officer, for public release. Examples include draft reports, fragments of data sets, or data without context.

**Minimum Necessary:** The minimum amount of client confidential or personal information needed to respond to a request or to assess client eligibility to provide services to the client will be requested from the client; data disclosed will be in full compliance with the Public Disclosure Act.

**Personal Information:** Personal information means demographic or financial information about a particular client that is obtained through one or more sources. This may include information such as name, address, social security number, income, education and housing information.

**Public Data:** De-identified information approved for release to external parties and the public. It may be either client-level or aggregated data.

**Privacy Policy:** Safe Harbors policy developed to comply with federal and state privacy requirements. The individuals responsible for implementing and managing this policy are Safe Harbors staff, Safe Harbors partner agencies, and partner agency staff using the Safe Harbors HMIS.

**Safe Harbors:** A project jointly funded by City of Seattle, King County and United Way of King County to implement HMIS required by Congressional directive.

**Safe Harbors Partner Agency:** An agency that signs the Safe Harbors Partner Agency Agreement thereby agreeing to abide by all conditions required of any agency using the HMIS and providing services to homeless people, referred to as clients.

**Safe Harbors Sponsors:** City of Seattle, King County and United Way of King County.

**Stakeholders:** Safe Harbors sponsors, participating agencies, programs, and homeless persons.

**Statistically Valid:** Any data sample that is sufficiently representative (large and random) of the "universe" of data to be accurate, within a narrow range of variation, 95% of the time.

## Data Rights and Responsibilities

Each of the Safe Harbors HMIS stakeholders has certain rights and responsibilities regarding the data collected within the HMIS. Client rights and agency obligations regarding client identifying information are presented in Safe Harbors' Security and Privacy policies.

### *Safe Harbors Sponsors*

Safe Harbors sponsors have rights to all public data, client-level and aggregated, produced through the HMIS. Sponsors are those local jurisdictions and organizations that contributed funds or resources to the development of the HMIS or to the maintenance of the system. Current sponsors are:

- King County
- United Way of King County

- City of Seattle

### *Safe Harbors Staff*

Safe Harbors staff is responsible for the proper collection and dissemination of information among the Safe Harbors HMIS stakeholders. Safe Harbors staff is responsible for ensuring that all client information is fully protected and that all data use conforms to Safe Harbors adopted policies.

### *Safe Harbors Agencies and Programs*

Safe Harbors agencies sign Safe Harbors Partner Agency Agreements (posted on [www.safeharbors.org](http://www.safeharbors.org)) pledging their agreement and support of all policies. They also agree to post the Safe Harbors HMIS Client Privacy Rights that defines the rights of clients and contact information for Safe Harbors should the client want to revoke access to their personal identified information.

## Standard Internal Data Access

### *Safe Harbors Staff*

The following Safe Harbors staff members have access to data during their typical working day.

#### *Database Administrators*

Safe Harbors Database Administrators have access to all data types. Database Administrators, as stated in the Security and Privacy policies, must pass a background check sign a non-disclosure agreement.

#### *System Administrator*

Safe Harbors System Administrator has access to all data types. The System Administrator, as stated in the Security and Privacy policies, must pass a background check and sign a non-disclosure agreement.

#### *Data Analysts*

Safe Harbors Data analysts will have access to internal data for the purpose of certifying the data. Data Analysts will certify the data for completeness, congruity, and statistical validity. They will add any necessary caveats or context to aid in the interpretation of the data.

#### *Safe Harbors Sponsors' Representatives*

Safe Harbors sponsors' representatives have access to public data that has been certified by Safe Harbors Data Analysts providing that the following condition have been met:

- Data is certified statistically valid (i.e., the data is statistically representative for the data elements, continuum of care components and the time period requested).

- Appropriate caveats and context are attached to data.
- Representatives have applied to and have obtained written permission from Safe Harbors administration to access data.

### *Safe Harbors Agencies and Programs*

Agency and program staff have access to their own agency's/program's data, as bound by the Safe Harbors Security and Privacy policies. Agency and program staff must sign Safe Harbors User Code of Ethics and agree to follow Safe Harbors policies and practices.

## Data Processing & Preparation

### *Cleaning*

Reviewing and cleaning data is the first step in preparing it for sharing. This will be done by the Safe Harbors HMIS database administrators or other certified Safe Harbors data analysts. During this process the data is reviewed for completeness, adherence to the data schema (data types and answer ranges), and consistency with prior data releases.

### *Preparing Data*

Usually some data modification is needed before it is shared. For any data that will be shared outside the agency of origin, data preparation will include the removal of all identifying and confidential information. In addition, case filtering, data element selection or other preparation may be needed prior to data release. This is often the case when preparing data for reports or for use by analysts that are focusing on specific populations or topics. Data subsets may be extracted according to time period, agency, agency type or any other dimension contained within the database.

### *Data Tagging*

Each data release must be accompanied by information describing the data source, time period covered, geographic area covered, and populations included. Also, any known data limitations and any context vital to accurately interpreting the data should be included.

## Scheduled Public Data Release

### *Certify Readiness*

Safe Harbors database administrator or in-house certified Safe Harbors data analyst must approve every data or report release by deciding that the data is statistically valid for sharing. There is no one standard test; it is a judgment call made by professionals trained data base specialists under management of or contracted by Safe Harbors. However, one statistical test might be sufficient coverage of the data subsets involved (e.g., at least 60% of all data parameters). The data must meet minimum necessary level either pre-determined by formal thresholds, or established

based on the Safe Harbors data administrators' judgment or by the judgment of a professional data analyst hired for the purpose of certifying Safe Harbors data.

When the database administrator or data analyst is unsure about the data set readiness with a less than 60% threshold, the Safe Harbors Advisory Committee must be consulted.

### *Types of Public Information Released*

There are several types of public information that may be released *without* following the Data Disclosure Policy found on [www.safeharbors.org](http://www.safeharbors.org). Information that may be released is aggregated information and some client-level de-identified information.

#### *Aggregated Information*

- **Pre-set Summary Reports** – simple reports of predefined information and timing released to agencies, funders' analysts, and other stakeholders.
- **Required Reports** – including the Annual Performance Report (APR) for the U.S. Department of Housing and Urban Development and other agreed upon reports required by local funders, county, state and federal organizations.

#### *Client-level Data*

- **Data Tables** – de-identified client level data to be used for subsequent data analysis. Often the tables are only a selected sample (usually filtered for client population, time period, service type or something similar) of the total cases available. Data tables are only available under the following conditions:
  - a. the users are certified and pre-approved and,
  - b. a written request to disclose data is submitted and approved by Safe Harbors staff; such requests may be on-going. (See Data Disclosure Policy posted on [www.safeharbors.org](http://www.safeharbors.org))

### *Release Notification*

The following actions will be taken whenever Safe Harbors generated data or report is released to the general public or to parties not directly participating in the Safe Harbors information system.

- Any agencies or programs that are identified by name within the data released will be notified in advance and provided third party notice pursuant to RCW 42.17.330.
- In the case of released reports, identified agencies and programs will be given the opportunity to review and comment on the reports before public release.
- In the case of released reports, notification will be posted on the Safe Harbors web site at the time of release.

- The Safe Harbors Advisory Committee (SHAC) will regularly be given reports summarizing the data access requests and permissions, and the report releases.

### *Safe Harbors Data Release Charge*

Since there are costs in generating data files or reports, Safe Harbors administration will charge external parties for the costs occurred in generating the requested data. These costs will include but are not limited to: analyst time, printing costs, and computer time, among others.

### *Sharing HMIS Client Identifying Data*

Data that contains client-identifying data will only be shared among the Safe Harbors participating agencies and programs, and only under the following conditions.

- Each and every client identified has given written permission that is currently in effect to share client specified information.
- Clients may revoke their consent for sharing information at any time by completing the Client Revocation of HMIS Consent or Client Revocation of Release and Sharing of Information found on [www.safeharbors.org](http://www.safeharbors.org). Should the client orally revoke the sharing privilege but refuse to complete the form, the form can be completed and signed by the case manager.
- Clients may limit by name the agencies and programs that may see their client-level identified information.