

1. What is informed consent?

Informed consent means that a client is informed by an agency of options for participating in a Homeless Management Information System and then specifically asked to consent to have their identifying information entered and shared at a regional level. According to Washington State law (RCW 43.185C.180), all clients must be informed of their options for participating in an HMIS and must consent in writing that they understand the options and risks of participating or sharing data in an HMIS. Clients who are 18 years of age or older and *unaccompanied* clients who are under 18 must sign a consent form. A head of household can sign a form for the minors in the household and should list the names of the minors on the form in the space available. These documents are then kept on file at the agency from which the client is receiving services. Safe Harbors data will never be used to eliminate services being received, shared with law enforcement (accept when applicable by law) or used in any way other than to improve homeless housing and supportive services. Consented data helps the community better understand the needs of clients and is used to improve services throughout King County.

2. What does it mean if someone refuses consent?

If a client refuses consent, it means that person does not want to be identified in HMIS. The client's record should not have any personal identifiers (First Name, Last Name, Social Security number) attached to it anywhere in the system. This record will not be accessible through the HMIS Client Services Search to programs outside the originating agency. In the HMIS, this means that records will be viewable only at an "organization consent level".

3. How should a record be entered into HMIS for a client who refuses consent who is not experiencing a domestic violence situation or who does not reveal confidential information regarding HIV/AIDS status?

If a client does not consent to providing identifying information in HMIS, the program staff should **check the Consent Refused box** which will disable the the first name, last name, and Social Security number fields for that person. This means that client cannot be identified in HMIS. A year of birth, gender, race, and zip code **should** be recorded and all other required data elements. An agency identifier should be added for this client. This will help the program staff recognize them in the system. This record will be kept at the organization level.

4. How should a record be entered into HMIS for a client who is experiencing a domestic violence situation?

Any data that, when combined, can be used to identify a client should not be entered into HMIS when a client is a survivor of domestic violence. All clients experiencing domestic violence situations (or at risk of being sought by an abuser) should be entered as a "consent refused" client. **ALL** clients in DV programs should be entered as "consent refused". Staff should **check the Consent Refused box** which will disable the first name, last name, and social security number fields for that person. A zip code and race should not be entered for this client but an approximate year of birth (1-3 years earlier or later than the actual year of birth) and gender

should be entered. All other required data elements should be complete for this person. An agency identifier should also be added for this client. This will help the program staff recognize them in the system. This record will be kept at the organization level.

5. How should a record be entered into HMIS for a client who has revealed confidential information regarding HIV/AIDS status?

If a client is identified in HMIS as being HIV positive or having AIDS, they should not have any identifiers associated with their record. This includes people who are served in a program that is HOPWA-funded or who have a 'Yes' answer to the HIV/AIDS program entry or exit question. Clients who have revealed confidential information regarding HIV/AIDS status should be entered as a "consent refused" client. The program staff serving the client should **check the Consent Refused box** which will disable the first name, last name, and Social Security number fields. This means that client cannot be identified in HMIS. A year of birth, gender, race, and zip code **should** be recorded and all other required data elements. An agency identifier should also be added for this client. This will help the program staff recognize them in the system. This record will be kept at the organization level.

6. How should a record be entered into HMIS for a client who gives consent?

If a person provides consent, the first name, last name, and Social Security number should be entered, as well as all other required data elements. This means a **full** name (not initials), **full** date of birth (day, month and year) and Social Security number if the client is willing to provide it. This record will be kept at a system level and can be searched by programs outside of the originating agency through the HMIS Client Services Search.

7. What if a client who gave consent at one agency and is already in the system goes to another agency and does not want to be identified as receiving services at that specific agency?

If the client only wants to refuse consent at that agency, the program staff should not search for them in the system even if the client or staff person knows that they are already in the HMIS. The agency staff should NOT locate the client in the system and delete their name. Deleting a client's identifying information does not make their record in the program unidentifiable or change their system generated ID. The program staff should start a new record in Central Intake and **check the Consent Refused box** which will disable the first name, last name, and Social Security number fields. This record will be kept at the organization level.

8. What if a client who did not give consent at one program wants to give consent at another agency?

The program staff at the second agency should create a new, identified record in the system, filling out all of the required data elements.

9. What if a client who gave consent and is already in the HMIS wants to revoke their consent?

If a client gave consent at one time and later decides that they would like to revoke their consent, the program staff needs to complete a consent revocation form. This form can be found on the Safe Harbors' Website (www.safeharbors.org) under "Forms". The client can choose to revoke consent from one program or from all programs where he or she has been served. If the client is a member of a household, he or she should also identify whether other household members' consent should be revoked as well. Once the form is completed, the program staff should call the Safe Harbors Help Desk (206-386-0030) to let them know that the form is being faxed. Once the Safe Harbors staff receives the form, they will notify program staff at each impacted agency that they need to add a new unidentifiable record for that person within two weeks. After two weeks, the record will be deleted from the system. It could be less than two weeks if there is reason to believe that the client's safety will be compromised by leaving the record in the system for that length of time.

10. How do I prevent a client from being duplicated in the system if they do not have identifiers?

There is no way to prevent this. Protecting the clients' confidentiality is Safe Harbors' priority. If a client refuses consent, there should be no identifiers associated with their name (besides an agency identifier), which means if they are served by another agency, an additional record will be created.

11. How will records without identifiers ("refused consent" records) impact data reporting?

Records without identifiers will still be counted on program reports (i.e. Annual Progress Report, Transitional Housing Operating and Rent...). If a program serves two clients who gave consent and have identifiers and two clients who did not give consent and have no identifiers, the report will still show that the program served four clients. For reports that require an unduplicated count over time across programs (i.e. Annual Homeless Assessment Report), an extrapolation method will be used to determine the percentage of unidentified records that should be counted as unique individuals.