



Privacy Policy for Client Data Collection and Data Sharing

Effective June 30, 2016

This agency administers state, county and federal programs designed to help community households in need. The funders supporting these programs ask us to collect personal information about the clients who apply for and receive their services. This information is needed to determine program eligibility and to help administer and coordinate program services. This Privacy Policy explains what information we collect, how it is protected and how it may be shared.

What information do we collect?

Information collected may consist of the following PPI (Protected Personal Information):

- Identifying Information (Name, birth date, gender, race, social security number, residential information, phone number, photograph likeness, etc., and same for each household member)
- Financial Information (employment status, income verification, public assistance payments and allowances, SNAP allotments, debts for utilities, rent, etc.)

How is client information stored?

Client information is kept in an online record-keeping system, and is a requirement for all programs and agencies providing services to low-income and homeless households with the support of state and/or federal funds.

How is client information protected?

The information that is collected in the database is protected by passwords, firewalls, virus protection and encryption technology. Access to computer software is protected by network passwords, database passwords and automatic logout for inactivity. Hard copy information is secured in areas that are not publically accessible. Computer equipment is disposed of in a secure manner. Client data is monitored to ensure that it is accurate, complete and timely. Personal information is disposed of or the personal identifiers are removed every seven years.

Access to client information is limited to only necessary staff, and every person that is authorized to read or enter information into the database has signed an agreement to maintain the security and confidentiality of the information. Any person that is found to violate this agreement may have their access rights terminated and may be subject to further penalties.

How is client information shared?

This agency works with other community agencies and will share client information with partners. Aggregate de-identified statistics (this means group statistics where the names are not shown) will be shared to produce regional or funder reports. We also share basic identifying and limited financial information about clients and

households to avoid duplication of records between agencies, and to coordinate services. Client data is only shared with partners or researchers who comply with the standards set forth by federal, state, and local regulations governing confidentiality of client records. Any person that is found to violate these standards may have their access rights terminated and may be subject to further penalties.

Agency Procedures:

- This privacy policy is available on our website: www.greaterbergen.org. Copies of this privacy policy will also be available at sites where personally identifiable information may be requested. Additionally, signs will be posted that explain generally the reasons for collecting any and all information.
- No identifiable client data will be entered into the system without client consent, and no identifiable client data will be shared outside of the limits of that consent.
- Staff will collect and retain signed client consent forms before any client data will be entered into the system. Staff will thoroughly explain the client consent to each client.
- Reasonable accommodations will be offered for persons with disabilities and/or language barriers.

Client Rights:

- Client records are protected by federal, state, and local regulations governing confidentiality of client records and cannot be disclosed without written consent unless otherwise provided for in the regulations.
- A client may refuse to answer any request for personal information, or refuse to share any personal information with Partner Agencies. Refusal will not be used to deny services, unless that information is necessary to determine eligibility.
- A client may request and receive a copy of all of their personal information, unless it will be used in potential litigation, contains information about another individual, or may endanger life or the physical safety of any individual.
- A client may request corrections or updates of personal information at any time.
- A client may revoke authorization to share personal information with a client Revocation of Consent to Release Information form. If not revoked, consent terminates automatically 7 years from the date of signature.
- Clients have the right to file a grievance statement if they have a complaint about this privacy policy.

We reserve the right to revise this notice. Any changes to this notice will be published on our website (www.greaterbergen.org) in a timely manner.