

Multnomah County HMIS Privacy & Security Notice

Table of Contents

- [1. Homeless Management Information System \(HMIS\)](#)
- [2. Use and Sharing of Information in HMIS](#)
- [3. Data Sharing Approvals](#)
- [4. Who Accesses HMIS](#)
- [5. Confidentiality Rights](#)
- [6. Your Information Rights](#)
- [5. How Your Information Will Be Kept Secure](#)
- [6. Benefits of Information Collection and Sharing](#)
- [7. Compliance with Other Laws](#)
- [8. Privacy Notice Amendments](#)
- [9. Website](#)
- [10. Contact Information](#)

Service providers collect information about you when you receive services from them. Information that can be used to identify you is called "protected personal information" or "PPI". PPI can include things like your name, address, telephone number, email address or social security number. An agency may also collect other forms of PPI. Agencies also frequently collect information about your situation and the services and referrals you receive.

This notice describes:

- what homeless service agencies are allowed to do with your PPI
- your rights about your PPI
- agency responsibilities to protect the privacy of your PPI
- how to submit a grievance if you believe your rights were violated.

This notice applies to all information collected from people receiving services. All agencies in the homeless service system must follow the current terms of this notice. This notice will be available in several languages. If available, you can request a copy in the language most familiar to you.

The law requires that your PPI is kept private. However, agencies you work with may use or share your information to provide you with services, and to meet legal and other obligations. By requesting services and giving your personal information, you allow an agency to collect and store that information. You also allow the agency to use or share your PPI as described in this notice and as otherwise required by law.

This notice is not a legal contract. The County reserves the right to change this notice at any time. If this notice changes, we will post the updated copy on our websites and make it available to you upon request. Any change to this notice will apply to information collected both before and after the date of the change, unless otherwise noted.

You may request a copy of our notice at any time. Please use the contact information at the end of this notice to request more information or receive copies of this notice.

1. Homeless Management Information System (HMIS)

The United States federal government requires that homeless service providers use special databases. These databases are called "homeless management information systems" or "HMIS". HMIS helps officials better understand the needs of unhoused people.

2. Use and Sharing of Information in HMIS

Homeless service agencies typically enter the information you share into HMIS. This includes PPI. Most agencies using HMIS share the data they collect with other agencies that also use HMIS. The data shared can vary across agencies and programs. Agencies across counties use different approaches to obtain your consent before sharing your information.

Sometimes the law allows agencies to record or share your information, including PPI, without your consent.

Most HMIS administrators working at the County level have full access to the system and the information in it. This level of access is necessary for system upkeep. HMIS administrators uphold the "minimum necessary" principle, which says that HMIS users should only access the minimum amount of data necessary to fulfill administrative needs.

Homeless service agencies in the area can share your personal information for the purposes described below. The purposes are organized into two categories: "May Share" and "Must Share". The purposes under "May Share" are optional disclosures to support services. Those under "Must Share" are required by law.

May Share

1. To plan, provide, coordinate or improve services across multiple agencies.
2. To locate other programs that may be able to assist you.
3. To carry out administrative activities including, but not limited to legal, audit, personnel, program evaluation, planning, analysis, aggregate reporting, oversight or management functions.
4. Where information sharing is allowed by law and doesn't share more than the law allows. This could happen during a medical emergency, or while reporting a crime against our staff or a crime on our premises, or to prevent a serious threat to health or safety.
5. When you or an authorized representative ask us to share information.

NOTE: Sharing PPI requires an approval from the HMIS Lead agency in some circumstances. Read the section called "Data Sharing Approvals" below for more information.

Must Share

6. For research required by contract where privacy conditions are met.
7. For activities related to payment or reimbursement for services.
8. To comply with legal reporting obligations.
9. In connection with a court order, warrant, subpoena or other court proceeding.

At certain times, HMIS users may share your information without your consent, as described above. An example of when this might be done is when a program shifts from one agency to another. To assist the new agency with serving participants, the original agency might share contact or other information, even if that information was not explicitly released by the participant. Other examples apply.

WellSky, the parent company of the local HMIS, may view, use, and share PPI to support the community. WellSky's support may include matching client records, sharing claims data, or enabling billing or payment-related activities. WellSky also may connect your PPI with that of other people to help create and manage client records.

We share some information throughout HMIS to avoid creating copies of client records. HMIS users will be able to see the following kinds of information for all client records:

- First & Last Name
- Social Security Number (required for specific services)
- Alias
- Age
- Veteran Status

PPI must be removed from HMIS data before sharing it when the purpose for sharing is solely for research. We never publish PPI along with reports or statistical information so that the information we disclosed cannot be used to identify you.

Protecting the privacy and safety of people using homeless services is very important to us. Information collected about you is personal and private. We only collect it when appropriate to provide services, manage our organization, or as required by law.

3. Data Sharing Approvals

The County or HMIS participating agencies are often authorized to transfer data into or out of the HMIS database. Data may be transferred to an HMIS participating agency or a non-HMIS participating agency in certain circumstances. An "HMIS participating agency" is any organization that accesses and uses Multnomah County's HMIS. A specific department, division or work unit may be considered an organization and, therefore, an HMIS participating agency.

HMIS-participating agencies retain ownership over their own information which they collect and is stored outside of HMIS. Agencies may share information they own with third parties without approval from the County's HMIS Lead so long as they follow all HMIS policies & procedures, the agency's own policies and applicable law. As between the County and an agency that has signed the County's HMIS Agency Participation Agreement, information inputted by the agency into HMIS is owned by the County.

Disclosures of PPI owned by the County to any non-HMIS participating entity must be approved in writing by the County's HMIS Lead agency or another group authorized in writing by the HMIS Lead. This written approval will be formalized in a data sharing agreement or data sharing authorization form.

4. Who Accesses HMIS

Each person who accesses HMIS signs an agreement to uphold our policies and procedures. HMIS policies protect the information and privacy of people who use homeless services. Each participating agency signs a legally binding agreement requiring the agency to adhere to HMIS policies & procedures. Only authorized people can access HMIS. The following descriptions are accurate as of this document's last update and are included only to provide helpful information. The County may expand upon these categories at any time. The absence of any categories below does not prevent additional categories of people from participating in HMIS.

People who use HMIS are:

- Certain staff at agencies that provide homeless services
 - These agencies operate in Clackamas, Multnomah and/or Washington Counties. Some teams providing direct services work at county or city departments. People in this group use HMIS to enter data, coordinate and run programs, help people receive services and generate required reports.
- HMIS administrators who work at either Clackamas, Multnomah or Washington County
 - People in this group manage the HMIS itself. They also train users, write reports, provide technical assistance, monitor data quality and ensure the overall success of the system.
- Data analysts
 - These are data professionals working in service agencies or city or county departments who extract data from HMIS, and compile and analyze it to inform data-driven decision-making to better serve our local community.
- Administrative staff within certain county or city departments
 - This group of people use HMIS to ensure that programs are meeting their contractual requirements. They also provide support to staff at service agencies.
- HMIS vendor staff
 - The HMIS vendor hosts and maintains the HMIS, which is a web-based software product. Wellsky has been the HMIS vendor for our community from 2005 through 2025. At some point in 2026 or 2027, the community will move to a new HMIS. The new HMIS was selected in 2025. The name of the new HMIS vendor is Bitfocus.

5. Confidentiality Rights

The privacy and confidentiality practices described in this notice form the rules about how HMIS information can be used. These rules were approved by the Homeless Services Department (HSD) of Multnomah County. HSD is the HMIS Lead agency for Multnomah and is authorized to approve these rules by the Multnomah County Continuum of Care board. A Continuum of Care board is a group of people who are responsible for making decisions for a homeless services system. These practices follow all applicable confidentiality rules, including rules for programs that receive funding for homeless services from HUD or other third-parties. Separate privacy and security rules apply to protected health information (PHI) subject to the Health Insurance Portability and Accountability Act (HIPAA). PHI is any information in your medical records that can be used to identify you or information about your medical status.

Every person and agency that is allowed to read or enter information into HMIS has been trained on client confidentiality policies. They have also signed an agreement to keep the information private and secure. Any person or agency that breaks their agreement may lose their access and is subject to further penalties.

6. Your Information Rights

As a person receiving homeless services from Multnomah County, you have the following rights:

1. *Access to your record.* You have the right to review and copy your HMIS record. If you send a request to view your record, County or agency staff will provide an initial response within five working days. If access to your record is denied, you will be given written documentation about your request and the reason we said no. A copy of that documentation will also be included in your services record.
2. *Correction of your record.* You have the right to ask that we correct your record. If we deny your request to correct your record, you will be provided written documentation about your request and the reason we said no. A copy of that documentation will also be included in your services record.
3. *Refusal.* In general, if you decide not to give your information to an agency, you will still be able to receive services. However, the ability to provide some services depends on having certain PPI. If an agency must collect certain information to provide services, agency staff will guide you through that process.
4. *Agency's Right to Refuse Inspection of an Individual Record.* Multnomah County and their providers may deny you the right to look at or copy your PPI for the following reasons:
 - a. information is part of a set of necessary legal documents;
 - b. it has private information about another person that isn't one of our staff;
 - c. the information was given to us by another person with the promise of confidentiality and sharing it with you would identify that person; or
 - d. sharing the information could put someone else at risk of danger or death.
5. *Harassment.* We reserve the right to deny your request to view, copy or correct your HMIS record if the requests are made over and over, or in a harassing way
6. *Grievance.* You have the right to be heard:
 - a. if you feel that your confidentiality rights have been violated,
 - b. if you have been denied access to your HMIS records without a reason,
 - c. or if you have been put at personal risk, or harmed.
 - d. Agencies you work with are required to maintain a system of written procedures through which you or your family member may present a grievance about service delivery. The agency's grievance process should be readily accessible to you. The agency will provide advice to you about the grievance process when requested.

Cont'd next page

5. How Your Information Will Be Kept Secure

Protecting your safety and privacy and keeping your records confidential is very important to us. We use training, policies, procedures and software in the following ways to make sure your PPI is kept safe and secure:

1. Staff who use HMIS use appropriate technical and organizational steps to protect your PPI against unauthorized access, accidental or unlawful destruction, loss, alteration, and unauthorized disclosure.
2. Only trained and authorized people will enter or view your PPI.
3. Your name and other PPI will not be included in HMIS reports that are given to local, state or national agencies that do not have access to HMIS.
4. People using HMIS receive training in privacy protection and agree to follow strict confidentiality rules before using the system.
5. In addition to WellSky staff, HMIS system administrators that work at the County support the use of the database. System admins follow and implement the rules we explained in this notice that protect the privacy of your information.

6. Benefits of Information Collection and Sharing

The information you provide that is entered into HMIS can play an important role. It supports our community's ability to continue providing the services that you and others in the community are requesting. It enables better coordination of services across those agencies and can help you to access services faster.

It also helps us understand the number of people who need services in the community and the types of services needed by different groups of people. This in turn allows us to:

1. Better show the need for services and the specific types of assistance needed in our area.
2. Make more services available to meet community needs.
3. Plan, improve, and deliver quality services.
4. Keep required statistics for state and federal funders, such as HUD.

7. Compliance with Other Laws

Multnomah County complies with all other federal, state and local laws regarding privacy rights. Consult with an attorney if you have questions regarding these rights.

8. Privacy Notice Amendments

This Privacy & Security Notice may change. If it does, the changes will apply to all information in the HMIS, including information collected prior to the change. Any changes to this Notice must follow rules from the federal government. These rules protect your privacy and guide how we use the HMIS.

9. Website

We maintain a copy of this Privacy and Security Notice, including translated versions, at:
<https://hsd.multco.us/hmis-links-for-providers/hmis-privacy-security-notice/>

10. Contact Information

Contact hmishelp@multco.us to ask questions about this document or to request more information about HMIS or your privacy.

Revision History

- November '25: The entire document was rewritten for plain language. Added a section called "Who Accesses HMIS". Added clarity around circumstances under which data can be shared without a release. Added Data Sharing Approvals section. Updated guidance around grievances to align to HSD contract language.