



## FAQ: Standard MultCo Verbal ROI Form for HMIS Data Sharing

For complete details about participant data rights and how HMIS information is used, visit: <https://hsd.multco.us/hmis-links-for-providers/hmis-privacy-security-notice/>

### Table of Contents

[What is the purpose of the verbal ROI form?](#)

[When should I start using the Verbal ROI form?](#)

[Am I required to obtain this ROI from a participant?](#)

[When do I read the Verbal ROI to participants?](#)

[Is a signature required by the participant on the ROI?](#)

[Can one adult consent to share data for another adult in their household?](#)

[What data are shared in HMIS regardless of consent?](#)

[What other information may be shared without a release?](#)

[Who can see participant data when it gets shared in HMIS?](#)

[How long does data sharing last in HMIS?](#)

[What do I do if the participant agrees to the ROI terms one or more days after they enter the program?](#)

[How many ROIs do I enter into HMIS?](#)

[If someone says “no” to the ROI, do I still need to enter it in HMIS?](#)

[Does the Verbal ROI Form itself need to be kept?](#)

[Does the Verbal ROI Form need to be uploaded in HMIS?](#)

[Where can I find a full description of a participant’s rights with regard to their information?](#)

[HMIS Help, Training and Resources](#)

[Revision History](#)

## **What is the purpose of the verbal ROI form?**

The purpose of the verbal ROI is to determine whether the participant agrees to share their information - beyond the PPI items that are globally visible - with other agencies within the HMIS. The purpose of the verbal ROI is not to enable agencies to collect participant data or enter it into HMIS. Regardless of ROI status, agencies must 1) present participants with an intake form containing all required questions, 2) support participants in answering required questions and 3) enter all required data from the intake form into HMIS. Again, the purpose of the verbal ROI is only to determine if the participant agrees to share their data, once collected and entered into HMIS, with other agencies.

*Important:* While we encourage agencies to collect all required data from participants to maximize data completeness and accuracy, participants may choose not to answer questions on an intake form for various reasons. If participants choose not to answer certain questions, they should still be eligible for services, as long as answering those questions is not a prerequisite for program eligibility (e.g. VA programs require the collection of social security numbers).

## **When should I start using the Verbal ROI form?**

All agencies should start using the verbal ROI as of July '25. That said, different agencies may be on different schedules with regard to adopting the verbal ROI. Check with your supervisor and email [hmishelp@multco.us](mailto:hmishelp@multco.us) with any questions.

## **Am I required to obtain this ROI from a participant?**

Yes. When creating a new program enrollment in HMIS, all providers are required to document whether a client consents to sharing identifying information in HMIS using the ROI provided by HSD. Not only does this ROI provide documentation of a client's consent, sharing information in HMIS allows providers to more easily serve clients, better obtain a picture of services clients are receiving across the continuum, and assist in the documentation of chronic homelessness.

## **When do I read the Verbal ROI to participants?**

Read the script to the participant at program intake. Document their “yes” or “no” answer on the Verbal ROI form. Do this before you start recording any of their information in HMIS. Agency staff should use their discretion as to when exactly to read the Verbal ROI during the intake.

## **Is a signature required by the participant on the ROI?**

No, a signature is not required. All the participant needs to do is indicate whether they agree to share their data within HMIS or not. If the participant has children (under 18 years old), they should also indicate whether they consent to have their kids’ data shared within HMIS or not. Staff need to document the answer on the form.

## **Can one adult consent to share data for another adult in their household?**

No, each adult (18 years or older) in the household must provide their own consent. A separate Verbal ROI should be completed for each adult in the household.

## **What data are shared in HMIS regardless of consent?**

The following data points are shared in HMIS regardless of whether the participant consents to share their data or not:

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

## **What other information may be shared without a release?**

HMIS data may be shared outside of HMIS with certain people in authorized organizations under certain circumstances. This is only the case if the HMIS Privacy & Security Notice allows it. The circumstances under which information may be shared without a release are described in the Privacy & Security Notice. The link to the Privacy

& Security Notice is under the question, “Where can I find a full description of a participant’s rights with regard to their information?” below.

Here are a few examples of when someone’s information may be shared without a release:

- If an agency were transferring a program to a new agency and the new agency needed contact information for existing participants
- To confirm whether a participant was eligible for a particular program
- If a participant had a medical emergency (e.g. heart attack or major injury), was unconscious and first responders asked for the participant’s name and birthday to help search for their medical record
- If a participant’s attorney requested their information
- If the County auditor needed access to HMIS information to fulfill an audit or Good Government Hotline complaint
- In relation to a court order or valid subpoena

See the Privacy & Security Notice for a full description of a participant’s rights.

## **Who can see participant data when it gets shared in HMIS?**

See the HMIS Privacy & Security Notice for more information about who has access to HMIS data. The link to the Privacy & Security Notice is under the question, “Where can I find a full description of a participant’s rights with regard to their information?” below.

## **How long does data sharing last in HMIS?**

With exception to basic identifying information, data sharing lasts for 7 years from the ROI start date. To ensure this happens correctly, please be sure to do the following:

1. Make the ROI Start Date equal to the program start date.
2. Mark the ROI End Date equal to the ROI Start Date *plus seven years*.

## **What do I do if the participant agrees to the ROI terms one or more days after they enter the program?**

Make the ROI Start Date equal the program start date even if they agree with the ROI on another day. Because of how the system is built, this is necessary to make the data

flow properly. We assume that the participant understands they are consenting to data sharing *for the program they are enrolled in*.

## **How many ROIs do I enter into HMIS?**

Enter two ROIs into HMIS: one for your login provider and one for the program the participant is entering. If you are unable to see the necessary providers to make this happen, please reach out to [hmishelp@multco.us](mailto:hmishelp@multco.us) for support.

## **If someone says “no” to the ROI, do I still need to enter it in HMIS?**

Yes, staff should still enter ROIs for participants who do not consent to share data. For people who do not agree to share their data, the “Permission Granted” field should equal “no” in the ROI in HMIS. When “Permission Granted” equals “no”, data will not be shared. These ROIs should still be entered to show that the participant was presented with the choice.

## **Does the Verbal ROI Form itself need to be kept?**

Yes, a copy of the completed form must be kept with the participant’s file for 7 years.

## **Does the Verbal ROI Form need to be uploaded in HMIS?**

No, a digital copy of the form doesn’t need to be uploaded to HMIS. The physical form does need to be retained for 7 years though.

## **Where can I find a full description of a participant’s rights with regard to their information?**

The [Privacy & Security Notice](#) provides a full description of a participant’s rights about their data. To see the Privacy & Security Notice, visit:

<http://hsd.multco.us/hmis-links-for-providers/hmis-privacy-security-notice/>

The Privacy & Security Notice must be made available to the participant upon request.

Please note: The [Privacy Poster](#) should also be posted visibly at all intake sites or made available to the participant at intake in another feasible way. To see the Privacy Poster, visit: <https://hsd.multco.us/hmis-links-for-providers/privacy-poster/>

## **HMIS Help, Training and Resources**

Contact for help or training

Please contact [hmishelp@multco.us](mailto:hmishelp@multco.us). We can answer any questions and help you determine what help or training might be needed.

Additional HMIS resources

We have a wide range of resources and documentation available on our website in the HMIS Links for Providers section: <https://hsd.multco.us/hmis-links-for-providers/>

How to record an ROI in HMIS

Video tutorial on how to record an ROI in HMIS:

<https://www.youtube.com/watch?v=A6YYacA-sd4>

Join us at our Monthly HMIS User Meeting

Homeless Services Department (HSD) (formerly Joint Office of Homeless Services (JOHS)) hosts a monthly meeting for HMIS users. In this meeting we:

- Share updates about HMIS
- Talk about user questions and issues
- Have conversations and give feedback

If you are an HMIS user at your agency and want to be invited, please reach out to:

[hmishelp@multco.us](mailto:hmishelp@multco.us).

## **Revision History**

**March '26:** Added question: What is the purpose of the verbal ROI?

**October '25:** Removed “Gender” from the list of data points that get shared regardless of consent. Gender is not among the elements that get shared in HMIS regardless of consent. Added the following questions & answers:

- “What other information may be shared without a release?”
- “Does the Verbal ROI Form need to be uploaded in HMIS?”