

Hudson County Alliance to End Homelessness
Data Sharing and Case Conferencing
Policies and Procedures

A. Purpose

The Hudson County Alliance to End Homelessness (HCAEH) is a consortium of agencies that work together to coordinate services and housing for homeless individuals and families throughout Hudson County. In order to most effectively serve clients accessing the system, the HCAEH has established procedures to enable agencies to share information and collaborate through case conferencing to address barriers faced by the clients they are serving. This policy will outline the expectations of the HCAEH for all agencies sharing information and utilizing case conferencing techniques. All agencies are also expected to maintain individual policies and procedures surrounding client level data.

B. Functions for Data Exchange of Client Information

Exchange of client information among agencies within the HCAEH will occur under either of the two listed conditions:

1. *General Data Sharing*: includes the discussion, electronic transfer or paper submission of individual client information between agencies within the HCAEH for the sole purpose of referring clients to agencies that both (1) offer services relevant to a client's needs and (2) have program eligibility requirements in which the client may genuinely meeting.
2. *Case Conferencing*: includes a formal in-person meeting or conference call between providers discussing and collaborating to determine the needs and services available to individual clients they are serving, addressing specific issues and barriers faced by clients, and facilitating the referral of services as deemed appropriate through the session.

Further details of each condition are outlined throughout the remaining portion of this document.

C. General Data Sharing

Written Consent

While the overall goal of the HCAEH is to provide services and assist clients in accessing shelter, permanent housing and supportive services, client information may only be shared among providers, through either general data sharing or case conferencing, with the written consent of the client seeking assistance.

To assist in this process, the HCAEH has established a standard Consent for Release or Exchange of Information (Appendix A). The purpose of this consent form is to facilitate the sharing and exchange of client information, with full client awareness, for the purpose of shelter, housing and making appropriate referrals for supportive services. It is the responsibility of the agency working with the client to secure client comprehension of consent policies, ensuring the client's decision on whether to provide

consent is rooted from a genuine understanding of what information is being solicited for sharing and how such sharing is facilitated.

All Agencies should work with clients to sign the consent form, if they are willing, immediately upon engagement to expedite the client's access to services available throughout the community.

All agencies that will receive or engage in data sharing must ensure their agency is included on this consent form before sharing any client level information. The client maintains the right to include additional providers they are working with on the consent. The client also maintains the right to exclude specific agencies from obtaining client level information. Any such requests of the client must be upheld.

It must be noted that if a client does not agree to have their information shared, and will not sign the HCAEH Consent form, this will not exclude them from receiving services through the HCAEH. All clients refusing to sign the consent form will still receive referral information for appropriate services available throughout the County and will be directed to the agencies that may best provide for them based on their need.

Consent Expiration

All consent forms will be valid for two years from the date of the signature unless otherwise specified in the consent form or if the client revokes their consent prior to the two-year period.

Any client seeking revocation must submit their Revocation of Consent for Release or Exchange of Information to any Agency listed on the original consent form. Revocation forms do not need to be submitted to the original agency in which the client signed the consent.

If client consent is revoked, the revocation will be effective per the date listed on the revocation and all information shared prior will still have been covered under the client's signed consent.

Data to be Shared

While the HCAEH consent form allows for data sharing among providers, it is the expectation of the HCAEH that client information will only be shared among agencies that both (1) offer services relevant to a client's needs and (2) have program eligibility requirements in which a client may genuinely qualify for. Data sharing for any other reason than the two listed stipulations is strictly prohibited (data sharing for case conferencing is listed below).

Only client information required to facilitate a referral to an agency or establish supportive services for the client may be shared among collaborating agencies. Client information unnecessary in establishing the aforementioned scenarios must be excluded from the sharing. Collaborating agencies must therefore, prior to exchanging client information, outline clearly the exact client information needed to accomplish the referral/distribution of services.

Because of the sensitivity of client information, agencies should make all efforts to exclude client specific information when possible, avoiding excessive distribution of personal client information.

D. Case Conferencing

To improve client access to supportive services in the community and to assist housing providers with overcoming client barriers, the HCAEH has established committees, each with a specific subpopulation focus. The goal of each committee is to evaluate the needs and barriers of these subpopulations and develop strategies and referrals that will help them access and work towards the goal of permanent housing. This is done through the evaluation and creation of specific policy items, as well as the use of case conferencing to evaluate the needs of specific clients.

While each committee's case conferencing operates in a way that is best for their population, there are a number of core practices that must be carried out through each committee:

1. The use of the HCAEH Consent Form
2. The use of a by-name list
3. Purposeful and relevant data sharing

HCAEH Consent Form for Case Conferencing

Client names and/or other identifying information will only be shared in a case conferencing session if that client has signed the HCAEH Consent for Release or Exchange of Information form. That form should be maintained by the Agency in which the client is currently coordinating with and the consent form signature should be noted in HMIS.

If a client has chosen not to sign a consent form, the barriers and housing status of that client may still be discussed so strategies or services may be made available, but the client's name and other identifying information must not be released in the session. The agency discussing the client may use that client's Client ID from HMIS which is specific to the provider serving the client and cannot be identified by another agency.

If a client has signed a consent form, but has chosen to exclude an agency that attends the case conferencing session, or if a new provider who was not included in the original consent of the client is participating in the session, the same measures of client anonymity should be followed as if the client had not signed a consent form.

Consent Expiration

All consent forms will be valid for two years from the date of the signature unless otherwise specified on the consent form or if the client revokes their consent prior to the two-year period. Any client seeking revocation must submit their Revocation of Consent for Release or Exchange of Information to any Agency listed on the original consent form. Revocation forms do not need to be submitted to the original agency in which the client signed the consent.

By-Name Lists

To facilitate the case conferencing, all committees will utilize a by-name list of the clients currently homeless within Hudson County that fit their specific subpopulation focus. The by-name list provides structure for the committee and a real time understanding of the scope of each subpopulation.

Each by-name list will include only pertinent information needed to facilitate the case conferencing session. A sample of the by-name list that will be used by all committees, showing the information that will be included, is attached to these policies (Appendix B).

The following steps will be done to create the by-name lists that will be used for each committee:

- The Hudson County Division of Housing and Community Development (the Division) will utilize HMIS to create a list of all households fitting into each specific subpopulation that are, on that date, literally homeless by staying in an emergency shelter, transitional housing or coordinated entry.
- The Division will then add client information that is received by outreach or non-HMIS providers to ensure the by-name list is comprehensive of the full subpopulation in focus.

Only clients that have signed the HCAEH Consent Form will have their name shown on the list. To ensure the list remains comprehensive, any client that has not signed a consent form will only be included on the list using their HMIS Client ID. This ID is specific to the program who is working with the client, preventing other agencies from identifying the client through a Consumer Look Up.

Clients will be removed from the by-name list once they have obtained permanent stable housing or if no contact has been made with that client throughout the full HCAEH system over a 90 day time frame. The client's information will be maintained by the Division and will immediately be added to the list if reengagement is made.

If a new agency attends any of the case conferencing sessions, and is not listed on the Consent Form to see client information, they will receive a blacked out version of the by-name list to ensure confidentiality, and client names will not be used during the discussion, as mentioned above. This measure will also be utilized if a client has specified that a particular agency does not have consent to see their information. The agency will also receive a specific copy of the by-name list that has the client's name blacked out.

All copies of the by-name list will be collected at the end of the meeting by the Hudson County Division of Housing and Community Development and will be shredded to prevent client names from being disseminated improperly.

Purposeful and Relevant Data Sharing

While the HCAEH Consent Form gives the Agencies included on the consent the ability to exchange client's personal information, all agencies will only share client data that is appropriate and relevant for the purpose of the client obtaining shelter, housing or a referral for other supportive services. All

agencies, both in case conferencing and through the referral process will take care to only disclose information that will specifically assist in the obtainment of these services.

Upon entering each committee meeting, all members attending will confirm that the information discussed and shared at the meeting will only be used in the meeting or to further facilitate a service referral on behalf of the client. This confirmation will be documented utilizing the committee sign in sheet (Appendix C).

E. Data Sharing Concerns

Any agency, provider or client who has reason to believe a committee or agency is not abiding by the policies outlined within should immediately reach out to the Hudson County Division of Housing and Community Development. The Division will address all concerns directly with the committee or provider and work to identify the appropriate level of action required to address the concern.