

Data Privacy and Data Security in the Homeless Management Information System (HMIS)



Overview of HMIS

In today's data-driven society, it has become more important than ever to protect the personal privacy of individuals and families that access housing resources through homeless services agencies and programs. The US Department of Housing and Community Development (HUD), which administers the Continuum of Care Program (CoC), has set strict regulatory requirements for the collection, storage, sharing, and safeguarding of client level data entered into the electronic Homeless Management Information System (HMIS). The Cape Cod and Islands CoC has incorporated, implemented, and updated these federal mandates into the HMIS Data Security Plan as part of the HMIS Policies and Procedures.

Privacy and Security of Client Data

The two central concepts of protection of client data are *data privacy* and *data security*. *Data privacy* refers to how *personal identifiable information* (PII) is collected and stored, how it is shared with third parties, and how regulatory restrictions apply to the handling of PII in the HMIS. PII includes obvious identifiers such as names, dates of birth, and Social Security numbers, but PII refers to more than just these obvious identifiers. Any data that could be used to identify an individual, even by using several fields in combination or manipulating the data in some way, is also PII. *Data security* is the process of safeguarding files in the HMIS through the use of controls, applications, and techniques that secure the data, protect it from unauthorized users, and ensure that data remains complete, accurate, intact, and available to authorized users.

Training New HMIS Users

Training for new users of the HMIS includes mandatory Data Security Training, which must be completed prior to being granted access to the system. The Training encompasses all aspects of the HMIS Data Security Plan and outlines processes for protecting the privacy of clients and for maintaining data integrity.

The Cape Cod and Islands CoC Virtual HMIS Security Training may be found under HMIS USER RESOURCES on the HMIS webpage.