

CSP Privacy Posting/Notice

COLUMBUS SERVICE POINT THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION PLEASE READ IT CAREFULLY.

Our Duty to Safeguard Your Protected Information

YWCA Columbus collects information about who accesses our services. When we meet with you we will ask you for information about you and your family and enter it into a computer program called the Columbus Service Point (Columbus CSP). Although Columbus CSP helps us to keep track of your information, individually identifiable information about you is considered “Protected Information”. We are required to protect the privacy of your identifying information and to give you notice about how, when and why we may use or disclose any information you may give us. We are also required to follow the privacy practices described in this Notice, although the **YWCA Columbus may amend this notice and change our policy or practices at any time. Amendments will only affect personal information that we obtained after the effective date of the amendment. Previously collected personal information will remain subject to the policy that applied when the information was collected.** We offer a copy of this privacy notice to each client at the time of intake, or if requested at a later date.

How We May Use and Disclose Your Information

We collect personal information only as appropriate for the following purposes: a. to provide or coordinate services to clients, b. to locate other programs that may be able to assist clients, c. for functions related to payment or reimbursement from others for services that we provide, d. to operate our organization, including administrative functions such as legal, audits, personnel, oversight, and management functions, e. to comply with government reporting obligations for homeless information systems, f. when required by law and g. for program evaluation purposes. We only use lawful and fair means to collect personal information. We collect personal information only with the express knowledge or consent of our clients. We may also get information about you from: a. Individuals who are with you, b. other private organizations that provide services to the homeless and c. Government agencies. We post a sign at our intake desk or other locations explaining the reasons we ask for personal information. The sign says:

“YWCA Housing Programs: Purpose for Data Collection. *In order to best serve your needs at the YWCA, to develop meaningful treatment plans, to determine your continuing eligibility for services, and to monitor your progress, this agency and the Community Shelter Board (CSB) need to collect data and information about you, your family, and the services you receive. Please understand that access to shelter and housing services is available without your participation in data collection. Your participation, although optional, is a critical component of our community’s ability to provide the most effective services and housing possible. The authorized data and information gathered and prepared by this agency and CSB will be included in a Columbus Service Point (CSP) database, and shall be used by CSB and authorized agencies including the YWCA, to: provide individual case management; produce aggregate-level reports regarding use of services; track program-level outcomes; identify unfilled service needs and plan for the provision of new services; allocate resources among agencies engaged in the provision of services; and to accomplish any and all other purposes deemed appropriate by CSB. We only collect information that we consider to be appropriate. Please see a YWCA staff member if you have any questions about this statement.”*

We use or disclose personal information for activities described in this part of the notice. We may or may not make any of these uses or disclosures. We assume that you consent to the use or disclosure of your personal information for the purposes described here and for other uses and disclosures that we determine to be compatible with these uses or disclosures. Other organizations that receive your personal information from us may have separate privacy policies and may allow different uses and disclosures of the information. We provide or coordinate services to individuals; a. for functions related to payment or reimbursement for services, b. to carry out administrative functions such as legal, audits, personnel, oversight, and management functions; c. to create de-identified (anonymous) information that can be used for research and statistical purposes without identifying clients, d. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law, e. to avert a serious threat to health or safety if we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, f. to report about an individual we reasonably believe to be a victim of abuse, neglect or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence under any of these circumstances: where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law, and if the individual agrees to the disclosure or to the extent that the disclosure is expressly authorized by statute or regulation and we believe the disclosure is necessary to prevent serious harm to the individual or other potential victims or if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure, and g. to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena.

You may inspect and have a copy of the personal CSP information that we maintain about you. We will explain any information that you may not understand. You may request the correction of inaccurate or incomplete personal information that we maintain about you. If we agree that the information is inaccurate or incomplete, we may delete it or choose to mark it as inaccurate or incomplete and to supplement it with additional information.

We may deny your request for inspection or copying of personal information if the information was compiled in reasonable anticipation of litigation or comparable proceedings; the information is about another individual (other than a health care provider or homeless provider); the information was obtained under a promise or confidentiality (other than a promise from a health care provider or homeless provider) if the disclosure would reveal the source of the information; or disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual. We may deny requests for access and copies of personal information that is generated by other agencies and sources. If we deny a request for access or correction, we explain the reason for the denial. We may reject repeated or harassing requests for access or correction.

We collect only personal information that is relevant to the purposes for which we plan to use it. To the extent necessary for those purposes, we seek to maintain only personal information that is accurate, complete, and timely. We are developing and implementing a plan to dispose of personal information not in current use seven years after the information was created or last changed. As an alternative to disposal, we may choose to remove identifiers from the information. We may keep information for a longer period if required to do so by statute, regulation, contract, or other requirement.

We accept and consider questions and complaints about our privacy and security policies and practices by use of a Client Concern form. These forms can be obtained by staff and submitted confidentially in a

secured locked box which is processed by management staff. You have the right to appeal policies, procedures, and staff and agency decisions. A Request for Appeal Form, which is explained during the Intake process, orientation meetings and by referring to program handbooks, may be submitted if you wish to challenge the policy or decision. An Appeals Committee will hear the appeal and document the outcome. The Appeals Committee may uphold, overturn and or modify the original outcome.

All members of our staff (including employees, volunteers, affiliates, contractors and associates) are required to comply with this privacy notice. Each staff member must receive and acknowledge receipt of a copy of this privacy notice. Each staff member takes formal training in privacy (once, annually or more frequently). We regularly review compliance with this privacy policy through routine internal and external reviews and audits. **Please review the Client Consent for Data Collection/Release of Information Authorization Form for more details about our data collection practices. You must sign this form before we can use your information, but you do not have to sign the form in order to receive services. Your consent, although optional, is a critical component of our community's ability to provide the most effective services and housing possible.**

1. Version 1.0 November 7, 2006. First draft.