CREATING AND MANAGING ANONYMOUS CLIENTS IN THE HMIS

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Community, Housing, and Human Services

808 W. Spokane Falls Boulevard, Spokane, WA 99201

Introduction

In order to meet federal, state and local privacy laws the Spokane Homeless Management Information System (HMIS) is required to have a process for creating anonymous records and de-identifying clients for persons who refuse to be identified in the system, disclose HIV/AIDS status or currently fleeing from domestic violence. After June 7th, 2018, unaccompanied youth have the ability to sign their own HMIS consent forms to have their personal identifying information (PII) entered in the HMIS. As a reminder, everyone gets an HMIS record created but not everyone gets a record that includes their personal identifying information (PII) and no clients shall be refused services for not providing PII.

What is the most commonly recognized personal identifying information (PII*)?

- Name
- Social Security Number
- Date of Birth or Age
- Address and Phone Number
- AIDS/HIV Status

**Any combination of data that could reasonable identify someone based on a case workers judgement or a client's situation can also be considered PII as well*

Process Overview

Step 1:

All clients enrolling in your project are entered into the HMIS.

Step 2:

You have confirmed that your client is part of a category of persons that does not have their PII entered into the HMIS or has refused to sign an HMIS consent form excluding their PII from entering the HMIS.

Step 3:

- ✓ Do not include any PII in the client's new record
- ✓ Use the template below to complete the basic client information form for new clients
- ✓ Submit a support ticket in the HMIS to de-identify an existing client
- ✓ Save your anonymous client's HMIS Client ID so their HMIS record will not be lost

See next pages for the full instructions

Creating a New Anonymous Client Record

*If you know the client's record is already in the HMIS, please skip to De-Identifying Existing Clients.

From the **Client** workspace, select the **Intake** workflow and select **Add a New Client** in the menu on the righthand side of the screen.

At the Client Information screen, enter the following information:

First Name: Anonymous

Last Name: Anonymous

Social Security Number: - -

Birth Date: 01/01/1980

First and Last Name entered as "Anonymous"

Enter an approximate date of birth: Use January 1st of the year after the client's actual birth year. *Use the client's true year of birth *only* when the client is **24 years old or younger, or over 60**. **This client's actual birth year, for example, is 1979.

Click » Next and continue to fill in the client's information:

SSN Quality:* Client doesn't know

Client prefers not to answer

Data not collected

Change the SSN Quality from the default "Client doesn't know" to "Data not collected"

Birth Date:* 01/01/1980

Client Age: 44

Date of Birth Quality:* Approximate or Partial DOB Reported

Full DOB Reported

Client doesn't know

Client prefers not to answer

Data not collected

Change DOB Quality to "Approximate or Partial DOB Reported"

Race:* ✓American Indian, Alaska Native, or Indigenous

Asian or Asian American

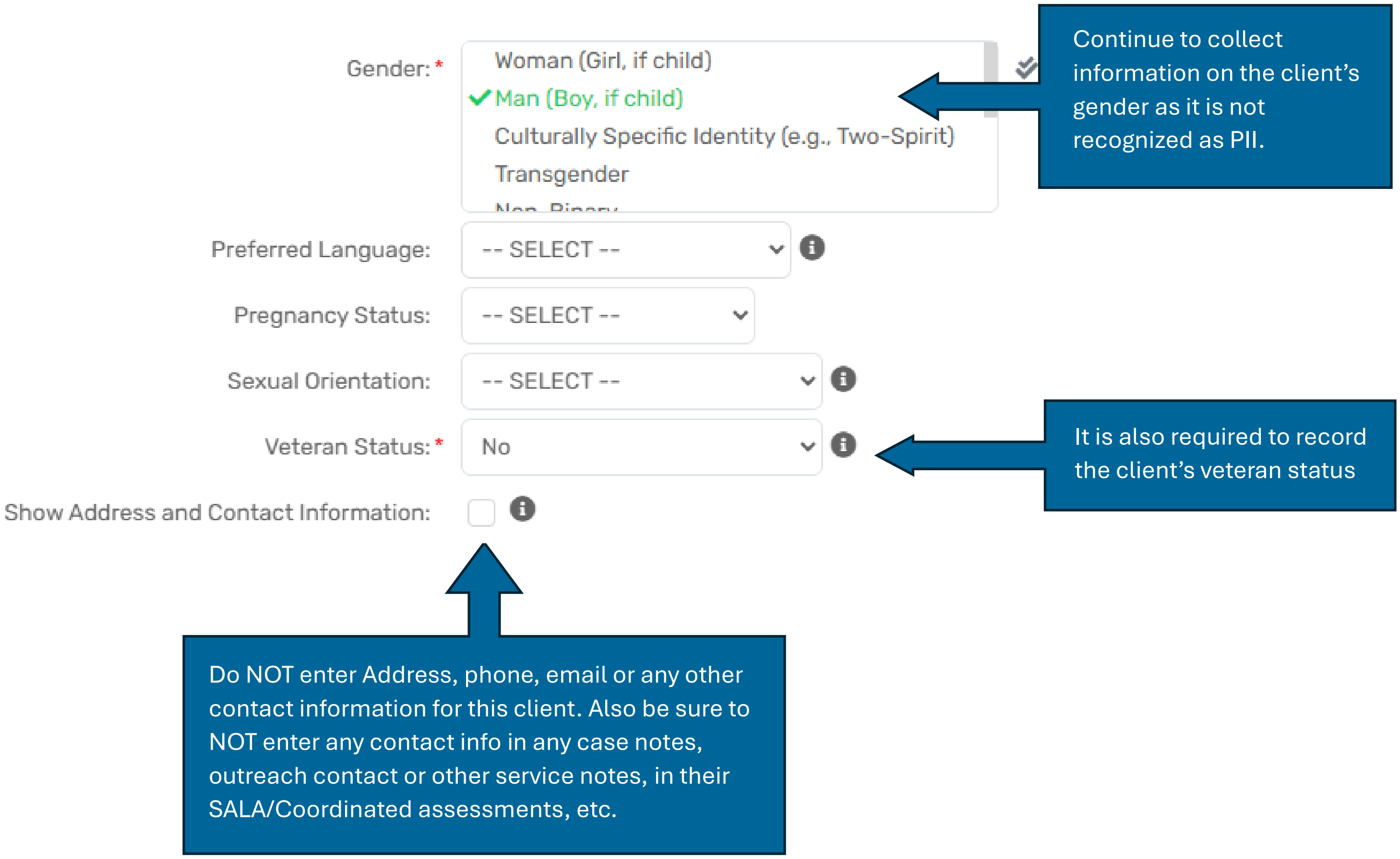
✓Black, African American, or African

Hispanic/Latina/e/o

Middle Eastern or North African

Continue to collect information on the client's race as it is not recognized as PII.

Micronesian: -- SELECT --



Next, be sure to save this client's full HMIS number in your organization's own secure, internal records associated with the client's name and DOB so it can be referenced when putting this client's enrollments and services in the HMIS. This also helps to ensure no duplicate, identified records are accidentally inputted in the HMIS by your organization.

Finally, to fully ensure none of this client's PII was entered into the HMIS, please see "De-identifying Existing Clients" on the next page

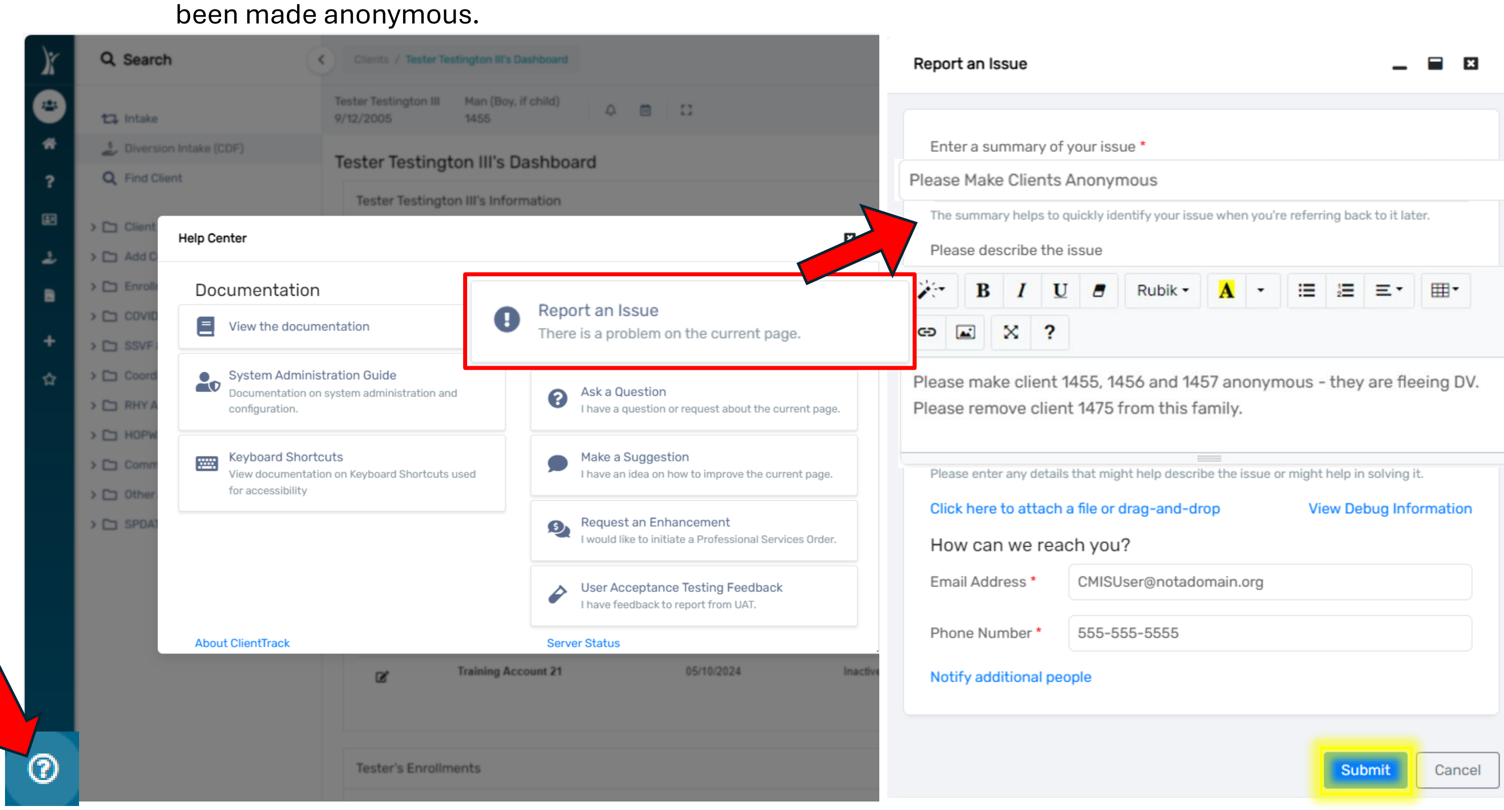
De-Identifying Existing Clients

Are you ready to request an existing record be made anonymous?

✓ I have communicated to everyone within my organization that this client(s) will become unidentifiable except by their Client ID in the HMIS.
✓ I have communicated to those working with this client(s) in the HMIS outside my organization that they will be unidentifiable except by their Client ID.
✓ I have located my organization's internal tracking sheet and recorded this client's name and their HMIS Client ID so it can be recalled, and enrollments and services can continue to be logged for them.
✓ I have recorded the Client ID in the client's hard copy file.
✓ I have saved a case note in the client's HMIS account stating that I've requested the client to be made anonymous.

NEXT STEP

- Navigate to the client's dashboard that you want to request be made anonymous in the HMIS. If there are multiple individuals in the household please navigate to the head of household's dashboard.
- Then submit a support ticket while on that client's dashboard requesting that the client and all members be made anonymous. *Do not include any PII in the ticket summary and description.
- If a client and members of their family are fleeing domestic violence and need to be removed from the household, please add that information in your request. Also, please include any other important details that would be necessary to know for the HMIS admin team.
- Be sure to look for any duplicate client profiles with the **Find Client** feature in the client workspace using a combination of the individual's name, date of birth and social security number. Please include any of these client IDs in the issue description.
- Check your support ticket daily for updates until you receive confirmation that your client has been made anonymous.



PLEASE REMEMBER

- You will best be able to find the de-identified client with the **Find Client** function in the client workspace using the "Client ID" field. The client's last name will now include their client ID.
- You will need to allow your case notes and other assessments you've created to be editable and not read-only in order for us to completely de-identify all records that may contain PII.
- Avoid creating duplicate anonymous clients by checking your internal tracking sheet first to see if the client already exists in the HMIS.
- If you require a merge of two anonymous client records or their complete accounts you need to provide both client IDs and confirm that the clients are indeed the same person(s).
- As part of our de-identification process, and to ensure all instances of PII are erased in our system, all document checks and associated files will be deleted. Please make sure any of these documents uploaded by your organization are in your own internal records.

ORGANIZATION CHECKLIST FOR LEADS, SUPERVISORS, AND MANAGERS

- [ ] This document is readily accessible for staff at your organization to read.
- [ ] People working at your organization and using HMIS know what is PII.
- [ ] Everyone at your organization knows which clients need to be made anonymous and what circumstances to exclude PII in the HMIS.
- [ ] There is an internal tracking sheet that records each person's HMIS Client ID and their name so that authorized staff at your organization can find those clients in the HMIS.
- [ ] Authorized people at your organization know how and where to access the internal tracking sheet and it's easily accessible.
- [ ] There is a process in place for letting outside agencies know your client's HMIS Client ID so they can log enrollments and services.
- [ ] There is a plan in place to continually monitor and assess that all anonymous records from your organization are being created and managed in accordance with this document