HMIS Forms Overview

New Security Changes: Changes have been made to the HMIS Consent and Release of Information forms and Snohomish County’s HMIS in ClientTrack. Those changes were made to reduce duplication of client records and agency efforts, increase coordination and data sharing, and to allow for streamlined referral processes around Coordinated Assessment.

The biggest change made was to the consent form. If a client signs page 1 of the revised consent form, it means their identifiable personal information, including but not limited to name, birth date, social security, race, and last permanent address, will be entered AND shared with HMIS partner agencies. This does not mean the programmatic information will be shared at that point. Programmatic information includes which agency the client is working with, what programs they’re enrolled in, what services and referrals they’ve received, and any assessments they’ve completed. Programmatic information can only be shared if the client signs the Release of Information on page 2 of the revised consent form.

FORMS:

Client Privacy Rights

Explanation: The Client Privacy Rights document is meant to provide additional information to clients about HMIS. It explains who sees their information, what their rights are, what the risks are, and the choices they have.

Requirements:

- Pursuant to the HUD Final Notice, each Agency must prominently display the HMIS Client Privacy Rights at each intake desk (or comparable location).

HMIS Informed Consent and Release of Authorization (IC-ROI) Form

Explanation: The Informed Consent and Release of Authorization forms gather information about a client’s preference for entering identifiable information in HMIS and who the information can be shared with. The first page is meant to obtain permission from the client to enter identifiable personal information in HMIS and to share it with other HMIS partner agencies. The second page obtains the necessary permission from the client to share their programmatic information with additional agencies. If a client agrees to share their programmatic information, there are two options: 1) Share with any other HMIS agency, or 2) Share with a specified MOU partnership or selected number of HMIS agencies.

Requirements:

- Consent must be provided by the household before any identifiable personal information is entered and shared in HMIS.
- The IC-ROI must be completed before any programmatic information is shared with HMIS partner agencies.
- Originals of the Consent and IC-ROI must be kept by the agency for 7 years after the date of signature.
- Each adult in the household must sign their own Consent and ROI.
  - A parent or guardian can sign for their dependents.
  - If an adult client has been declared legally incompetent, the court appointed guardian must sign and provide a copy of the order of appointment. If someone is signing in another capacity (including a person with a power of attorney), obtain a copy of the legal authority to act.
• If the client chooses the first option AND requests a list of the HMIS Agencies, or MOU partners, the agency must provide that information to the client.

• Agency lists:
  o A list of all HMIS Partners is available on p. 7 of the HMIS Policies & Procedures document located on the HMIS website at https://snohomishcountywa.gov/852/HMIS-Documents.
  o All MOU Partnerships are required to provide the clients with a list of the agencies involved.

**HMIS Informed Consent and Release of Authorization (IC-ROI) Form Scenarios:**

**Scenario One:**
- A two parent household consents to their identifiable personal information being entered in HMIS AND releases their programmatic information to all HMIS Partners.
- Agency steps:
  o Both adults in the household must sign a Consent and ROI form.
    ▪ One of the adult’s forms must list the dependent children under 18.
  o On the second page of the Consent and ROI form, Option One would be selected. If the client asks for a list of HMIS Partners, the Agency must provide that list. As was noted above, a list of all HMIS Partners is available on p. 7 of the HMIS Policies & Procedures document located on the HMIS website at https://snohomishcountywa.gov/852/HMIS-Documents.

**Scenario Two:**
- A single person with no children consents to their identifiable personal information being entered in HMIS AND releases their programmatic information to one agency, e.g. Compass Health.
- Agency steps:
  o The person signs the Consent and ROI.
  o On the second page of the Consent and ROI, Option Two would be selected and the Agency must write in “Compass Health.”

**Scenario Three:**
- A single person consents to their identifiable personal information being entered in HMIS, BUT does not want their programmatic information shared with any other agencies.
- Agency steps:
  o The person signs the first page of the Consent and ROI. The second page is not necessary at this point because the person will not be sharing their programmatic information with other agencies.

**Client Revocation of HMIS Consent:**

**Explanation:** A Client may withdraw or revoke his or her consent for identified information collection by signing the Revocation of HMIS Consent form located on the HMIS website at https://snohomishcountywa.gov/852/HMIS-Documents.

**Requirements:** If a client revokes his or her consent, the Agency is responsible for immediately contacting the HMIS administrator to ensure the identifiable information is removed from HMIS.