Data Sharing & Privacy

Local Homeless Coordinating Board (LHC B)
Coordinated Entry/Online Navigation and Entry (ONE) System Committee
Future of Data Sharing & Privacy

- HMIS Data Standards
- Citywide Data Sharing Policy Initiative
- DHSH will be included in the city’s covered entity
  - This will include all present & future users of the ONE System
The Future of Sharing Protected Health Information (PHI)

Health Insurance Portability & Accountability Act (HIPAA) Covered Entity

One City and County of San Francisco Privacy Notification

Department of Homelessness and Supportive Housing Programs

Minimum necessary data sharing allowed for...

Department of Public Health Programs

Substance Abuse Treatment program records covered by 42 Code of Federal Regulations (CFR) Part 2
HIPAA and T.P.O.

Health Insurance Portability and Accountability Act:
- Federal privacy law that protects patient privacy
- Protected health information can be shared for:
  - Treatment
  - Payment
  - Operations
HIPAA Protected Health Information

Health Information + Identifiers = Protected Health Information (PHI)

http://dhsh.sfgov.org
**Health Information**: Any information you collect that is related to the:

1. physical or mental health of an individual,
2. provision of health care, or
3. payment for the provision of health care.
HIPAA Protected Health Information

**Identifiers:** Any unique identifying number, code, or characteristic
**HIPAA Limitations**

- **Minimum Necessary Rule**: requires that information sharing be kept to the minimum amount of information necessary to do your job.

- **Need-to-Know Basis**: client level data should only be shared with staff that have a legitimate reason to have the information.

[http://dhsh.sfgov.org](http://dhsh.sfgov.org)
Every client must be provided with the "Notice of HIPAA Privacy Rights" upon entry.
Only YOU Can Prevent Data Breaches!

• If you **see** something, **say** something…

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http://dhsh.sfgov.org
Next Steps

- Review Privacy Policy
- Form recommendation for Local Homeless Coordinating Board (LHC B) adoption
HSH values client privacy as an important part of our mission to provide quality services with compassion and respect.

Thank you for helping us protect the privacy of our clients and residents.