

PARTICIPATION OF DOMESTIC VIOLENCE PROGRAMS IN HOMELESS MANAGEMENT INFORMATION SYSTEMS (“HMIS”)

An HMIS is a computer data system that collects information about individuals and families who use homeless housing and service systems. Data collection is important in order to develop an accurate, unduplicated count of homeless persons and their individual service needs. Agencies assisting victims of domestic violence have heightened privacy and confidentiality concerns. HUD recognizes the need for stricter privacy and confidentiality standards with respect to the issue of domestic violence, but also requires all agencies – including domestic violence programs – that receive federal HUD funding to participate in HMIS. Below are listed some ways in which information about domestic violence victims can be kept particularly secure, meeting both HUD’s confidentiality and privacy standards as well as the concerns of the domestic violence community.

- Create a unique hashed/coded/encrypted identifier for domestic violence victims in order to add an extra level of security to the de-identified information collected and transmitted to the central database server
 - HUD’s existing privacy and confidentiality standards are baseline standards; communities may impose greater restrictions if they wish
 - HUD’s baseline privacy and confidentiality standards already impose *eight* layers of security and privacy protections, including:
 - ◆ User authentication (user names and passwords)
 - ◆ Locking screen savers and session timeouts
 - ◆ Firewalls and virus protection
 - ◆ Location control (where the HMIS computer(s) are located)
 - ◆ Digital certificates
 - ◆ System monitoring requirements
 - ◆ Restrictions on physical access to the central server and protections for hard copy data records
 - ◆ Restrictions on the uses and disclosures of personal information
- Add the domestic violence victim’s personal information into the computer database after the client has left the program
- Ensure that your community’s domestic violence HMIS policy is consistent with your state’s and/or locality’s confidentiality laws concerning domestic violence victims; if there is a conflict between HUD’s standards and your own state’s (or locality’s) laws, state/local standards prevail over HUD’s standards
 - HUD has requested that communities request the Attorney General of their state to prepare and submit to HUD a legal opinion stating the effect of local law on HUD’s domestic violence confidentiality protections
- Domestic violence programs may be added last to a community’s HMIS in order for the community at large to reach consensus about the best way to handle this particularly sensitive information