

Privacy Policy to Secure LCoCMIS Information

Commission on Economic Opportunity

A. What This Notice Covers

1. This notice describes the privacy policy and practices to secure records of the Commission on Economic Opportunity regarding the Luzerne Continuum of Care Management Information System (LCoCMIS).
2. The policy and practices in this notice cover the processing of protected LCoCMIS information for clients of the Commission on Economic Opportunity and its programs.
3. Protected Personal Information (PPI), as defined by the US Department of Housing & Urban Development, is any information the Commission on Economic Opportunity maintains about a service recipient that:
 - a. allows identification of an individual directly or indirectly; or
 - b. can be manipulated by a reasonably foreseeable method to identify a specific individual;
 - c. can be linked with other available information to identify a specific client.
4. The Commission on Economic Opportunity adopted this policy in accordance with the Homeless Management Information Systems Data and Technical Standards issued by the U.S. Department of Housing and Urban Development. We intend our policy and practices to be consistent with those standards. (Federal Register, Volume 69, Number 146) We also intend for our policies to be consistent with Federal, State and applicable local laws.
5. This notice tells the Commission on Economic Opportunity involved staff, clients, volunteers, vendors, funders and others how personal information in the LCoCMIS is processed at the Commission on Economic Opportunity.
6. We may amend this notice and change our policy or practices at anytime. Amendments may affect personal information that we obtained before the effective date of the amendment. The new notice will be posted at least 30 days prior to taking effect.
7. The Commission on Economic Opportunity will provide a written copy of this LCoCMIS privacy notice to any individual or organization that requests one. The Commission on Economic Opportunity also maintains a copy of this privacy policy to secure LCoCMIS information notice on its web site located at www.ceopeoplehelpingpeople.org.

B. How and Why We Collect Personal Information

1. The Commission on Economic Opportunity collects and maintains personal information on LCoCMIS clients only when appropriate to provide services, to comply with government and other reporting obligations, for another specific purpose of our organization, or when required by law.
2. The Commission on Economic Opportunity uses only lawful and fair means to collect personal information.

3. If you seek assistance that involves the LCoCMIS from the Commission on Economic Opportunity and provide personal information, the Commission on Economic Opportunity infers that you consent to the collection of information as described in this notice.
4. The Commission on Economic Opportunity may also obtain LCoCMIS information about those seeking services from:
 - a. Other individuals who are accompanying the person seeking services, such as a guardian, caretaker or advocate; or
 - b. Referring organizations and/or other LCoCMIS service providers.
5. The Commission on Economic Opportunity posts a sign at LCoCMIS intake desks explaining the reasons we ask for personal information. The sign says:

This Agency receives funding from U.S. Department of Housing and Urban Development and/or provides services for individuals and their families. We collect personal information directly from you for reasons that are discussed in our privacy policy. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect for the LCoCMIS system is important to run our programs, to improve services, and to better understand the needs in the community.

We only collect information that we consider to be appropriate. The collection and use of all personal information is guided by strict standards of confidentiality. A copy of our privacy policy for securing LCoCMIS information describing our confidentiality standards is available upon request.

THIS AGENCY DOES NOT REQUIRE OR IMPLY THAT SERVICES BE CONTINGENT UPON A CLIENT'S PARTICIPATION IN LCoCMIS, ALTHOUGH OTHER NON-LCoCMIS INFORMATION TO DETERMINE ELIGIBILITY IS REQUIRED.

C. How the Commission on Economic Opportunity Uses and Discloses LCoCMIS Personal Information

1. The Commission on Economic Opportunity uses or discloses personal LCoCMIS 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 to all organizations that are part of the LCoCMIS for the purposes described below and for other uses and disclosures that we determine to be compatible with these uses or disclosures:

- a. To provide or coordinate services;
- b. For functions related to payment or reimbursement for services;
- c. To carry out administrative functions, including, but not limited to legal, audit, personnel, oversight and management functions;
- d. For creating a unique identifier;
- e. When required by law to the extent that use or disclosure complies with and is limited to the requirements of the law;

- f. 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, and the use or disclosure is made to a person reasonably able to prevent or lessen the threat.
- g. To report about an individual we reasonably believe to be a victim of abuse or neglect to a governmental authority authorized by law to receive reports of abuse or neglect under any of the following circumstances:
 - where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law;
 - to the extent that the disclosure is expressly authorized by statute or regulation.
- h. To a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under any of these circumstances:
 - in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena.
 - If the law enforcement official makes a written request for protected personal information that: (1) is signed by a supervisory official of the law enforcement seeking the PPI; (2) states that the information is relevant and material to a legitimate law enforcement investigation; (3) identifies the PPI sought; (4) is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and (5) states that de-identified information could not be used to accomplish the purposes of the disclosure.
 - If the organization believes in good faith that the PPI constitutes evidence of criminal conduct that occurred on its premises;
 - In response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, Social Security Number, and distinguishing physical characteristics; or
 - if the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others); and if the information requested is in writing and is specific and limited in scope to the extent reasonably practicable in light of the purpose for which it is sought.

D. How to Inspect and Correct Personal Information

1. Consumers may inspect and have a copy of their PPI that is maintained in the LCoCMIS. The Commission on Economic Opportunity will respond to any such request made by a consumer within a reasonable time frame, usually 2-3 business days.
2. The Commission on Economic Opportunity will consider requests for correction of inaccurate or incomplete personal LCoCMIS information from consumers. If the

Commission on Economic Opportunity agrees that the information is inaccurate or incomplete, staff may delete it and supplement it with additional information.

3. To inspect, get a copy of, or ask for correction of personal information, a consumer can contact the Commission on Economic Opportunity staff member. A designated staff member will assist with the review and/or correction of the file within a reasonable time period, usually 2-3 business days.
4. The Commission on Economic Opportunity may deny a request for inspection or copying of personal information if:
 - a. the information was compiled in reasonable anticipation of litigation or comparable proceedings;
 - b. the information is about another individual;
 - c. disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
5. If a request from the LCoCMIS service recipient for access or correction is denied, the Commission on Economic Opportunity will explain the reason for the denial. The Commission on Economic Opportunity will also include, as part of the personal information that is maintained, documentation of the request and the reason for the denial.
6. The Commission on Economic Opportunity may reject repeated or harassing requests for access or correction.

E. Data Quality

1. The Commission on Economic Opportunity collects only personal information that is relevant to the purposes for which we plan to use it or as required for reporting to our funders. To the extent necessary for those purposes, the Commission on Economic Opportunity seeks to maintain only personal information that is accurate, complete, and timely.
2. The Commission on Economic Opportunity plans to dispose of personal information not in current use seven years after the information was created or last changed.
3. The Commission on Economic Opportunity may keep information for a longer period if required to do so by statute, regulation, contract, or other requirement.

F. Complaints and Accountability

1. The Commission on Economic Opportunity accepts and considers questions or complaints about our privacy and security policies and practices. To file a complaint, a consumer should follow the Commission on Economic Opportunity's LCoCMIS grievance procedure.

Date: July 11, 2007