

St. Vincent DePaul Mission of Waterbury, Inc. Privacy Practices Notice

A. What this Notice Covers

1. This notice describes the privacy policy and practices of St. Vincent DePaul Mission of Waterbury, Inc.'s Mental Health Division programs, Shelter and SAGA program. The policy and practices in this notice cover the processing of protected personal information of the clients served in these programs.
2. All personal information we maintain is covered by the policy and practices described in this privacy notice.
3. Protected Personal Information (PPI) is any information we maintain about a client that:
 - a. allows identification of an individual directly or indirectly;
 - b. can be manipulated by a reasonably foreseeable method to identify a specific individual; or
 - c. can be linked with other available information to identify a specific individual

When this notice refers to personal information, it means PPI.

4. We adopted this policy because of standards for Homeless Information Systems issued by the Department of Housing and Urban Development. We intend our policy and practices to be consistent with those standards.
5. This notice tells our clients, our staff and others how we process personal information. We follow the policy and practices described in this notice.
6. We may amend this notice and change our policy or practices at any time. Amendments may affect personal information that we obtained before the effective date of the amendment. You will not automatically receive a revised Notice if our policy or practices change. If you would like to receive a copy of a revised Notice you can contact your Case Manager/Counselor.
7. We are required to provide you with a copy of this privacy notice upon request and to abide by the Notice that is in effect.
8. We maintain a copy of this policy on our website at www.stvincentdepaulmission.org.

B. How and Why We Collect Personal Information

1. We collect personal information only when appropriate to provide services or for another specific purpose of our organization or when required by law. We may collect information for these purposes:
 - a. To provide or coordinate services to clients
 - b. To locate other programs that may be able to assist clients
 - c. For functions related to payment or reimbursement from others for services that we provide
 - d. To operate our organization, including administrative functions, such as legal, audits/funder audits, personnel, oversight and management functions
 - e. To comply with government reporting obligations
 - f. When required by law

2. We only use lawful and fair means to collect personal information.
3. We normally collect personal information with the knowledge or consent of our clients. If you seek our assistance and provide us with personal information, we assume that you consent to the collection of information as described in this notice.
4. We may also get information about you from:
 - a. Individuals who are with you
 - b. Other organizations that provide services to you, such as local shelters, mental health clinical providers, etc.
 - c. Government agencies that provide services to you, such as the Department of Housing & Urban Development, Department of Social Services and the Department of Mental Health & Addiction Services
 - d. Telephone directories and other published sources
5. We post a sign in our data entry office explaining the reasons we ask for personal information. The sign reads:

We collect personal information directly from you for reasons discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that provide us with funds to operate our programs. Other personal information that we collect is important to administer/manage our programs, to improve services for clients/homeless individuals, and to better understand the need of clients/homeless individuals. We only collect information that we consider to be necessary and appropriate.

■ C. ■ How We Use and Disclose Personal Information

We use or disclose personal information for activities described in this part of the notice. We may or may not make any of these uses or disclosures with your information. We assume that you consent to the use or disclosure of your personal information for the purposes described here and for other uses and disclosures that we determine to be compatible with these uses or disclosures:

- a. To provide or coordinate services to individuals
- b. For functions related to payment or reimbursement for services
- c. To carry out administrative functions such as legal, audits/funder audits, personnel, oversights and management functions
- d. To create de-identified (anonymous) information that can be used for research and statistical purposes without identifying clients
- 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:

(1) 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

(2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat,

including to the target of the threat

g. To report about an individual we reasonably believe to be a victim of abuse, neglect or domestic violence to a governmental authority (including a social services or protective service agency) authorized by law to receive reports of abuse, neglect or domestic violence

(1) under any of these circumstances:

(a) where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law

(b) if the individual agrees to the disclosure, or

(c) to the extent that the disclosure is expressly authorized by statute or regulation, and

(I) we believe the disclosure is necessary to prevent serious harm to the individual or other potential victims, or

(II) if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure.

And

(2) when we make a permitted disclosure about a victim of abuse, neglect or domestic violence, we will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:

(a) we, in the exercise of professional judgment, believe informing the individual would place the individual at risk of serious harm, or

(b) we would be informing a personal representative (such as a family member or friend), and we reasonably believe the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interests of the individual as we determine in the exercise of professional judgment.

h. For academic research purposes

(1) conducted by an individual or institution that has a formal relationship with the St. Vincent DePaul Mission of Waterbury, Inc. (SVDP) if the research is conducted either:

(a) by an individual employed by or affiliated with the organization for use in a research project conducted under a written research agreement approved in writing by a program administrator (other than the individual conducting the research) designated by SVDP or

(b) by an institution for use in a research project conducted under a written research agreement approved in writing by a program administrator designated by SVDP.

And

(2) any written research agreement:

- (a) must establish rules and limitations for the processing and security of PPI in the course of the research

- (b) must provide for the return or proper disposal of all PPI at the conclusion of the research

- (c) must restrict additional use or disclosure of PPI, except where required by law

- (d) must require that the recipient of data formally agree to comply with all terms and conditions of the agreement, and

- (e) is not a substitute for approval (if appropriate) of a research project by an Institutional Review Board, Privacy Board or other applicable human subjects protection institution.

- i. To a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct), including in connection with a court order, warrant, subpoena or other court proceeding where disclosure is required
- j. To comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless information systems requirements

D. How to Inspect and Correct Personal Information

1. You may inspect and have a copy of your personal information that we maintain. Requests for inspection or copies of personal information should be submitted in writing to your Case Manager/Counselor. We will offer to explain any information that you may not understand.
2. We will consider a request from you for correction of inaccurate or incomplete personal information that we maintain about you. If we agree that the information is inaccurate or incomplete, we may delete it or we may choose to mark it as inaccurate or incomplete and to supplement it with additional information.
3. We may deny your request for inspection or copying of personal information if:
 - (1) the information was compiled in reasonable anticipation of litigation or comparable proceedings;
 - (2) the information is about another individual (other than a health care provider or homeless provider);
 - (3) the information was obtained under a promise of confidentiality (other than a promise from a

health care provider or homeless provider) and disclosure would reveal the source of the information; or

(4) disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual

4. We may deny repeated or harassing requests for access or correction.

5. If we deny a request for access or correction, we will explain the reason for the denial. We will also include, as part of the personal information that we maintain, documentation of the request and the reason for the denial.

E. Complaints and Accountability

1. We accept and consider questions or complaints about our privacy policies and practices. Questions or complaints must be submitted in writing to the Executive Director. The Executive Director will review all questions and complaints and respond to the client within ten (10) business days, unless the Executive Director is unavailable. If unavailable, a response will be provided within ten (10) business days of the Executive Director's return.

2. All members of our staff are required to comply with this privacy notice.