

## **ABRI – Resident Privacy Policy**

1. ABRI collects personal information from clients, including but not limited to: name, social security number, date of birth, demographic information, employment status, income information, diagnoses, and medical history. This information is referred to as “Protected Personal Information (PPI).”<sup>\*</sup> This information is stored in clients’ charts, electronically in internal databases, and is reported to funding agencies and through HMIS (see #10). We may be required to collect some personal information by law or by organizations that give us money to operate this program. The purpose of collecting this information is to assist ABRI staff in providing services to clients and referring them to appropriate community resources. We also use this information to improve services for homeless persons and to better understand the needs of the populations we serve.
2. Residents will be required to sign a release of information with primary treatment provider prior to admission to the facility. It is understood that while residing at ABRI: Homes for the Brave Transitional Housing Program you must remain actively involved in your treatment and ABRI staff will be part of your treatment team along with your primary treatment provider.
3. ABRI shall not permit the disclosure of the identity, diagnosis, prognosis, or treatment of any such resident that would constitute a violation of Federal Statutes concerning confidentiality of alcohol or substance abuse participants’ records and any regulations pursuant thereto, or as they may be amended from time to time; and shall adopt regulations to protect the confidentiality of information by it.
4. ABRI may make available to authorized persons information from residents’ records for the purpose of conducting scientific research, arrangement audits, financial audits, and program evaluations provided such information shall not be utilized in a manner that discloses residents’ names or other identifying information. ABRI may also disclose PPI in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena.
5. ***ABRI will not disclose any information over the telephone to any agency or person, private or public, or any such resident admitted to its program.***
6. ABRI will disclose PPI to a continuing treatment facility, service agency and law enforcement agencies, provided the resident has signed a release of information specific to these agencies.
7. ABRI may disclose PPI if ABRI staff believe the disclosure is necessary to prevent or lessen a serious and imminent threat to the health of safety of an individual or the public. In this case, disclosure can be made to a person reasonably able to prevent or lessen the threat.
8. Residents have a right to refuse signing a Release of Information. However, refusal that prevents sharing of information critical to your treatment and/or rehabilitation may jeopardize your rehabilitation. Should you revoke your Signed Release of Information, ABRI will be notified, and this may result in discharge from the program.
9. Residents have a right to view the information stored in their chart with the assistance of ABRI staff. To request access to this information, clients must file a request with the program’s Clinical Director.
10. ABRI also shares PPI externally through the Homeless Management Information System (HMIS). Your participation in this program is voluntary. If you choose not to participate, that will in no way affect the services you receive. You can choose to have any information you have shared deleted from the system at any time. You can also ask to see a document which lists the persons who have viewed or updated your client record. You can revoke any written consent at any time. For the purpose of reporting requirements and advocacy, your information will be used without revealing your name or other information which would identify you.
11. If a resident needs assistance reading and understanding his privacy rights, ABRI will provide reasonable accommodation to assist him/her.
12. If a resident feels his privacy rights, as outlined above, have been violated, he has a right to file a complaint with the Clinical Director of ABRI, who will then investigate the resident’s allegations and provide the resident with a the results of any inquiry.

<sup>\*</sup>Protected Personal Information (PPI) is defined as any information maintained by or for ABRI about a living resident or individual that (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual. (“Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice.” Federal Register 69: 146 (July 30, 2004) p. 45928.)