

HOUSE OF RUTH

Privacy Notice Summary

This notice describes the privacy policy of House of Ruth. House of Ruth may amend this policy at any time, and will maintain a record of the changes made as well as post new versions on House of Ruth's web site located at www.houseofruth.org. This notice applies to the personal information of persons served through our program(s) that is collected or maintained by House of Ruth in hard copy or electronic formats or through the DC Homeless Management Information System (HMIS).

In relation to this information, House of Ruth:

- Collects personal information only when appropriate or required by funders;
- Will not disclose personal information without written consent unless specifically stated within the notice;
- May use or disclose information in order to provide services;
- May also use or disclose information to comply with legal requirements or other obligations as described in the notice; and
- Assumes that, unless stated otherwise, persons applying for or receiving services agree to allow us to collect, use or disclose information as described in this notice.

Each person providing personal information can:

- Inspect his/her personal information that is maintained by House of Ruth;
 - Ask us to correct inaccurate or incomplete information within the record;
 - Ask about House of Ruth's privacy policy or practices;
 - File a grievance regarding House of Ruth's privacy policies and practices. House of Ruth will respond to questions and complaints;
 - Request a copy of the full notice for more details.
-

HOUSE OF RUTH

Privacy Policy

A. What This Notice Covers

1. This notice describes the privacy policy and practices of House of Ruth. Our main office is at **5 Thomas Circle, NW, Washington, DC, 20005**. Our phone number is **(202) 745-2326** and our web site is located at **www.houseofruth.org**.
2. The policy and practices in this notice cover the processing of protected personal information for clients of House of Ruth and its programs.
3. Protected Personal information (PPI) is any information House of Ruth maintains about a client that:
 - a. allows identification of an individual directly or indirectly; and
 - 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 client. When this notice refers to personal information, it means PPI.
4. House of Ruth 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. See *69 Federal Register 45888 (July 30, 2004)*. We also intend for our policies to be consistent with requirements outlined in the DC Homeless Services Reform Act and other applicable local laws.
5. This notice tells House of Ruth clients, staff, contractors, HMIS users and others how personal information is processed at House of Ruth.
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. The new notice will be posted at www.houseofruth.org at least 30 days prior to taking effect.
7. House of Ruth will provide a written copy of this privacy notice to any individual or organization that requests one. House of Ruth also maintains a copy of this notice on its web site located at www.houseofruth.org.

B. How and Why We Collect Personal Information

1. House of Ruth collects and maintains personal information only when appropriate to provide services, or for another specific purpose of our organization, or when required by law.

Information may be collected for the following purposes:

- a. To comply with government and funder reporting obligations;
 - b. When required by law.
2. House of Ruth uses only lawful and fair means to collect personal information.
 3. If you seek assistance from House of Ruth and provide personal information, House of Ruth assumes that you consent to the collection of information as described in this notice.
 4. House of Ruth may also obtain 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 service providers (with proper consent).
 5. House of Ruth posts a sign at our offices explaining the reasons we ask for personal information. The sign says:

DC Continuum of Care Privacy Posting

The U.S. Department of Housing and Urban Development (HUD) requires that each jurisdiction that receives funding from HUD must have a Homeless Management Information System (HMIS) in place. Therefore, this Agency is required to participate in the DC Homeless Management Information System (HMIS), a computerized system that collects and stores basic information about the persons who receive services from this Agency. The goal of the DC HMIS is to assist us in determining your needs and to provide a record for evaluating the services we are providing to you.

We only collect information that is needed to provide you services, and we do not share your information without written consent, except when required by our funders or by law, or for specific administrative or research purposes outlined in our privacy policy. By requesting and accepting services from this program, you are giving consent for us to enter your personal information into the HMIS.

The collection and use of all personal information is guided by strict standards of confidentiality as outlined in our privacy policy. A copy of our agency's Privacy Policy is available upon request for your review.

C. How House of Ruth Uses and Discloses Personal Information

1. House of Ruth uses or discloses personal 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 for the purposes described below and for other uses and disclosures that we determine to be compatible with these uses or disclosures:

- a. When required by law to the extent that use or disclosure complies with and is limited to the requirements of the law;
 - b. 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.
 - c. 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.
 - d. 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 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.
 - e. To comply with government funding reporting obligations.
2. Before we make any use/disclosure of your personal information that is not described herein and above, we will seek your consent first.

D. How to Inspect and Correct Personal Information

1. Consumers may inspect and have a copy of their PPI that is maintained in the HMIS. House of Ruth will respond to any such request made by a consumer within a reasonable time frame, usually 2-3 business days. Agency staff will offer to explain any information in the file.
2. House of Ruth will consider requests for correction of inaccurate or incomplete personal information from consumers. If House of Ruth 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 any House of Ruth staff member. The appropriate staff member will be located to assist with the review and/or correction of the file within a reasonable time period, usually 2-3 business days.
4. House of Ruth 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 for access or correction is denied, House of Ruth will explain the reason for the denial. House of Ruth will also include, as part of the personal information that is maintained, documentation of the request and the reason for the denial
6. House of Ruth may reject repeated or harassing requests for access or correction.

E. Data Quality

1. House of Ruth 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, House of Ruth seeks to maintain only personal information that is accurate, complete, and timely.
2. House of Ruth disposes of personal information not in current use seven years after the information was created or last changed.
3. House of Ruth may keep information for a longer period if required to do so by statute, regulation, contract, or other requirement.

F. Complaints and Accountability

House of Ruth accepts and considers questions or complaints about our privacy and security policies and practices. To file a complaint or question, a consumer should do the following:

- The consumer should first follow House of Ruth's grievance procedure.
- If the question or complaint cannot be resolved internally, House of Ruth will then follow procedures for grievances as required by the Homeless Services Reform Act.