

POLICY TITLE: Obtaining Verbal Consent to share data in HMIS during COVID-19 Emergency

POLICY ADMINISTRATION: The Homeless Clearinghouse, Cincinnati/Hamilton County
Continuum of Care Board

EFFECTIVE DATE: March 10, 2020 through June 30, 2020

Eff 06.19.2020: Extension approved to Sept 30 2020

Further Extension Approved through March 31st, 2021 (as of August 19th 2020 vote of CH)

Further Extension Approved through September 30th, 2021 (as of March 19th 2021 vote of CH)

Further Extension until 1 month after health officials determine special measures to prevent the spread of COVID-19 are no longer needed (as of September 17th 2021 vote of CH)

Due to the current COVID-19 public health emergency and in order to comply with social distancing orders implemented by the State of Ohio and local authorities, staff at CoC agencies have been conducting virtual and telephone appointments with clients. As a result, receiving wet and/or digital in-person signatures, as is typically required, is not currently feasible.

POLICY:

In order to ensure clients are provided with fast and effective service, for a limited time until June 30, 2020 (and to be reevaluated at that point) agencies may obtain a verbal consent to share client information in HMIS, including personally identifiable information (PII), when no other consent is present. (Extension approved by Clearinghouse to continue until September 30, 2020. Further extension approved by Clearinghouse to continue until March 31, 2021. Further extension approved by Clearinghouse to continue until September 30, 2021.)

PROCEDURE:

Agency staff will follow this procedure to ensure proper steps are taken to protect client PII and ensure Privacy protections are observed:

- Agency staff will identify if a client already has a valid consent in HMIS.
 - o If they do, agency staff will continue using standard procedures.
 - o If there is no valid consent, or if the client is not in the HMIS, agency staff will perform the following actions:
 - Describe to client what the HMIS is and why the CoC collects and shares PII
 - Request permission to share their PII in the HMIS
 - If verbal permission is granted, agency staff will note it in the appropriate location in HMIS record, then continue using standard procedures.