## **Better Lives Rhode Island**

Policy and Procedures for Obtaining Client Release of Information (ROI) in HMIS

## **a. HMIS Release of Information**

Statewide Data Sharing is a process guided by the client through the Release of Information (ROI). It is therefore imperative that the client understand the ROI, and that staff address any questions the client may have, while respecting the client's right to decline to share data.

**Prior to entering information into HMIS**, BLRI staff shall attempt to obtain the informed (written or verbal) consent of the client, with written consent preferred, using the HMIS Release of Information form.

The following procedures will be followed by BLRI licensed HMIS users:

* + 1. BLRI staff will use the HMIS Release of Information form (ROI), for all clients where written or verbal consent is required.
    2. The HMIS Data Privacy Notice will be available for review by all clients and clients will be provided with copies as requested.
    3. BLRI staff will note any limitations or restrictions on information sharing on a client's ROI with appropriate data entries into HMIS. Staff will direct any questions regarding data sharing to the HMIS Agency Administrator. If questions cannot be answered internally, the HMIS Agency Administrator will contact the HMIS Lead for clarification.
    4. BLRI staff will be responsible for ensuring that consent is understood and given by a person competent to provide consent. For example, in the case of a minor, staff will comply with applicable laws regarding minor consent and obtain the consent of a parent or guardian.
    5. If BLRI is the agency that received the client's initial ROI form, staff will scan and upload the signed copy of the form to the HMIS. The original copy will be kept on file in a secure location for a period of seven years. ROI forms will be available for inspection and copying by the Lead Agency at any time.
    6. If an ROI has been properly recorded in the client's HMIS record by another agency, BLRI staff need not present the client with another ROI form.

## **Client Refusal to Grant Consent for Release of Information**

## BLRI staff will not condition any services upon or decline to provide any services to a client based upon a client's refusal to sign a form for the sharing of information in HMIS. Similarly, clients may not penalized or discriminated against based on historical data contained in the HMIS. In cases where a funding source requires the entry of identified information into the HMIS to deliver services, client data must be restricted from sharing if no consent is obtained.

If a client does not consent, pursuant to the HMIS Release of Information (ROI) form, the information **will still be entered into HMIS** **and the record will be locked** by the user or Agency Administrator to ensure that client data is not shared within HMIS.

If a client who had previously granted consent, withdraws or revokes consent for release of information, BLRI staff will notify the HMIS Agency Administrator immediately. The HMIS Agency Administrator will in turn contact the HMIS Lead to ensure that client's information will not be shared from that date forward. Clients will continue to receive the same level of service as when the ROI was in effect.