

## Notification of Privacy FAQ's

### *FAQ's on the Procedure for Administering the Notification of Privacy to NEW Clients and their Adult Household Members*

#### What is the Notification of Privacy (NoP)?

The NoP is a document that explains **NEW** client's rights to privacy and who has access to the information they provide. It functions as a script that will need to be gone over with each **NEW** client in addition to the *Idaho Privacy Notice*.

#### When do I Administer the NoP to the Client?

The Notification of Privacy must be reviewed with each **new** client **AND** all their **Adult Household** members.

In addition to the NoP, new clients should also review and be offered a copy of the *Idaho Privacy Notice*. The Idaho Privacy noticed should be referenced **ANY TIME** data is collected to allow the client to review their privacy rights in-depth.

#### How do I Administer the NoP to the New Client and Adult Household Members?

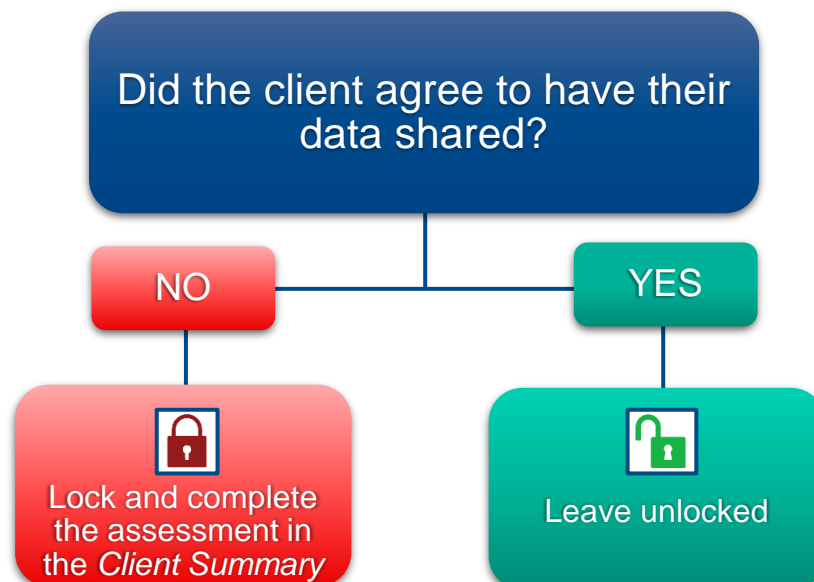
The NoP (along with the *Idaho Privacy Notice*) will need to be gone over\* with all of the adult members in the household. Either read the NoP aloud to the client/adult household member or have them read a copy.

\*If you explain the NoP in your own words make sure you offer them a copy of the NoP and *Idaho Privacy Notice* for reference.

#### How do I record responses?

Each adult in the household should each provide their own answer verbally. If a client answers **YES** to sharing their data, no further action is required.

If a client answers **NO** and would like to restrict access to their data, you will need to **LOCK** their account.



### **How do I lock an account for someone that does NOT want their data shared?**

Go to the Client Information Summary tab and fill out the short assessment at the bottom. The assessment asks to confirm the client refused to share their data, select yes and include an explanation of the refusal. Lastly, remove the global visibility group to show the locked status.

To review how to lock an account reference the following in Tovuti (our training platform): Course 2, Lesson 5 - Notification of Privacy

### **What about Client accounts that default to “Locked” such as CMIS, HOPWA and minors?**

The NoP will need to be referenced to inform them of their privacy, but they will need to be informed that their information will never be shared. The assessment will not be necessary for these clients, but their accounts will still need to be locked.

### **How do I change privacy preferences for Clients at a later date?**

Contact the HMIS Lead at [hmis@ihfa.org](mailto:hmis@ihfa.org) as these instances are handled on a case-by-case basis.

### **Can we make changes to the NoP?**

At an agency level, there can be additions made to the document if needed. However, the HMIS Notification of Privacy talking points provided MUST be gone over with all new clients and adult household members.