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## DRAFT Standard Operating Procedure (SOP)- HMIS Client Request of Records

## 1. Purpose

Clients who are provided services in the CoC will have records in the HMIS. According to the <u>KC HMIS Client Information Sheet</u>, "You have a right to view your record and to correct inaccurate information. You also have a right to a copy of your record" Unfortunately, the current state of the HMIS doesn't allow clients to have direct access into the HMIS. Therefore, clients should have access to their HMIS records upon request. This procedure and policy lays the foundation of how the HMIS lead, currently KCRHA, will set up a process for these requests to be met.

## 2. Scope

This applies to HMIS client generated records only. This does not include other client records that providers may hold outside of the HMIS.

## 3. Responsibilities

KCRHA is to make known the ability for clients to make requests, and maintain a process for fulfilling these requests in a timely manner while maintaining confidentiality and privacy of the records at all times. KCRHA as the HMIS Lead, is responsible for ensuring there is a process in place for clients to request records. However, there are additional parties that may be involved in fulfilling these requests such as service providers, KCRHA programs that are providing direct service to clients, the HMIS vendor, currently Bitfocus, and KCRHA Ombuds office for sending and receiving these requests.

In the event the client's current or previous service provider or other aforementioned parties are unable to provide the record, KCRHA will be responsible for responding directly to clients request for access to their HMIS records. KCRHA must respond within 5 business days directly to the client. The Community Impact (CI) team will receive these requests and process them.

## 4. Procedure

## How Clients will Request their records

Clients can access their records the following ways;

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- 1. By contacting their Service Provider directly. Service Providers must provide records upon request and will need to set up policies to be able to handle these requests in a reasonably timely manner.
- By Contacting the Bitfocus Helpdesk at 206-444-4001x2 or <u>kcsupport@bitfocus.com</u>. Bitfocus will route the request to the System Administration team at Bitfocus, which will notify the current HMIS Lead, KCRHA.
- 3. By contacting the <u>KCRHA Ombuds office</u>. The office will then route the request to the CI team at KCRHA within one business day.
- 4. By KCRHA and HMIS Websites through an online form. (to be developed).

There will be no cost to the client for requesting these records. The client can request as often as they would like.

## Verification of Identity

To ensure that records are provided to the actual client, before providing any records, The person responding to the request must verify identity. To do this, a meeting either in person or virtually can be scheduled. The client will need to bring photo identification. In the event that the client record is requested for a client who is incapacitated for any reason, a power of attorney can request a record with a notarized statement.

# What HMIS Client Record will be provided

[CLNT-101] Case Notes [CLNT-102] Client History [CLNT-104] Profile Screen [CLNT-106] Client Service Notes [CLNT-125] Client Summary [CLNT-107] Client Enrollment Details

Clients will receive their records in a method they request, either printed, or electronically via email. Once reports are submitted, they are to be deleted from any computer and not to be saved.

## **Records Request Log**

The Community Impact team will maintain a log of these requests, which will include;

The HMIS Unique Identifier of the client making the request, the date of the request, when it was fulfilled, reports that were created to fulfill the request, how identity was

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verified before the request was fulfilled, contact information of client for any future questions or follow up, and the name of the staff person fulfilling the request.

## 5. References

Client Request Form (to be created) <u>Client HMIS Client Information Sheet</u> <u>Client Grievance Form</u> <u>Client HMIS Release of Information (ROI)</u>

#### 6. Definitions