

EXHIBIT C

User Policy, Responsibility Statement & Code of Ethics

For: _____
User (Print Name)

From: _____
(Print Agency Name)

USER POLICY

Partner Agencies who use Minnesota's HMIS and each user within any Partner Agency is bound by various restrictions regarding the Client information.

It is a client's decision about which information, if any, is entered into Minnesota's HMIS and whether that information is to be shared and with any Partner Agencies. If your agency is covered by HIPAA or 42 CFR Part 2 (federally-defined treatment facility), it is also Client's decision about whether the Institute for Community Alliances (ICA) may use information for research purposes. The appropriate Minnesota's HMIS Client Informed Consent and Release of Information Authorization shall be signed by Client before any Client information is designated for sharing with any Partner Agencies, or, in the case of HIPAA covered entities, authorized for research use. User shall insure that prior to obtaining Client's signature, the Agency's Notice of Uses and Disclosures was fully reviewed with Client in a manner to insure that Client fully understood the information (e.g. securing a translator if necessary).

USER RESPONSIBILITY

A User ID and password give a User access to the Minnesota HMIS system. User must initial each item below to indicate User's understanding and acceptance of the proper use of User's ID and password. Failure to uphold the confidentiality standards set forth below is grounds for immediate termination from Minnesota's HMIS.

_____	My password is for my use only and must not be shared with anyone. I must take all reasonable means to keep my password physically secure.
_____	I understand that the only individuals who can view information in Minnesota's HMIS are authorized Users who need the information for legitimate business purposes of this Agency and the Clients to whom the information pertains.
_____	I may only view, obtain, disclose, or use the database information that is necessary to perform my job.
_____	If I am logged into Minnesota's HMIS and must leave the work area where the computer is located, I must log-off before leaving the work area.
_____	Any hard copies of personally identifiable (client-level) information printed from Minnesota's HMIS must be kept in a secure file, and destroyed when no longer needed.
_____	If I notice or suspect a security breach, I must immediately notify the executive director of the Agency and the System Administrator for Minnesota's HMIS (Institute for Community Alliances (ICA)).

USER CODE OF ETHICS

- a. Users must be prepared to answer client questions regarding Minnesota's HMIS.
- b. Users must faithfully respect client preferences with regard to the entry and sharing of client information within Minnesota's HMIS. Users must accurately record Client's preferences by making the proper designations as to sharing of Client information and/or any restrictions on the sharing of Client information.
- c. Users must allow client to change his or her information sharing preferences at the client's request.
- d. Users must not decline services to a client or potential client if that person (i) refuses to allow entry of information into Minnesota's HMIS (except if that policy is over-ridden by agency policy); or (ii.) refuses to share his or her personal information with other service providers via Minnesota's HMIS.
- e. The User has primary responsibility for information entered by the User. Information Users enter must be truthful, accurate and complete to the best of User's knowledge.
- f. Users will not solicit from or enter information about clients into Minnesota's HMIS unless the information is required for a legitimate business purpose such as to provide services to the client.
- g. Users will not alter or override information entered by another Agency.
- h. Users will not include profanity or offensive language in Minnesota's HMIS; nor will Users use Minnesota's HMIS database for any violation of any law, to defraud any entity or conduct any illegal activity.
- i. Upon client request users must allow a client to inspect and obtain a copy of the client's own information maintained within Minnesota's HMIS. Information compiled in reasonable anticipation of or for use in a civil, criminal or administrative action or proceeding need not be provided to Client.
- j. Users must permit Clients to file a written complaint regarding the use or treatment of their information within Minnesota's HMIS. Client may file a written complaint with either the Agency or the Institute for Community Alliances (ICA). If not satisfied, clients may file a complaint with the HMIS advisory body via the Minnesota Coalition for the Homeless. Clients may not be retaliated against for filing complaints.

I understand and agree to comply with all the statements listed above.

User Signature: _____ Date: _____

Preferred ServicePoint Login (username): _____

Work Phone: _____ E-mail Address: _____

Witness Signature (ICA State System Administrator): _____ Date: _____