

**POSTING: Privacy Practices
ClientTrack
Effective 1/10/2018
Version2.0**

The purpose of this notice is to generally explain to you why we collect personal information from you and refer you to our ClientTrack Notice of Privacy Practices for additional information regarding how this information may be used or disclosed.

When you request services from this agency, we enter information about you and members of your family into a computer system called ClientTrack. ClientTrack is used by many social service agencies throughout the state of Indiana that provide housing and related services.

We collect personal information directly from you for reasons that are discussed in our ClientTrack Notice of Privacy Practices. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless individuals, and to better understand the need of homeless individuals. We only collect information that we consider to be appropriate.

We may use or disclose your information to provide you with services. We may also use or disclose it to comply with legal and other obligations. We assume that you agree to allow us to collect information and to use or disclose it as described in the ClientTrack Notice of Privacy Practices.

You can inspect personal information about you that we maintain, as provided in the ClientTrack Notice of Privacy Practices. You can also ask us to correct inaccurate or incomplete information. Please contact your Case Manager or agency Executive Director to make this request.

Feel free to ask us about our privacy and security policies and practices. We will respond to your questions and/or complaints regarding our privacy and security policies and practices. Please read the ClientTrack Notice of Privacy Practices for additional information. You will be provided with a copy of the ClientTrack Notice of Privacy Practices upon request.



CLIENTTRACK NOTICE OF PRIVACY PRACTICES

01-10-18

THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY

IHCDA's ClientTrack:

When you request services from this victim service provider, we will enter information about you and your family into the ClientTrack. ClientTrack is a computer database administered by the Indiana Housing and Community Development Authority ("IHCDA"), and is used by victim service providers throughout the State of Indiana that provide services to victims of domestic violence, dating violence, sexual assault, or stalking. The information collected in ClientTrack will help us reduce duplicate intakes, document the need for services, and generate reports such as the number of persons who are homeless in Indiana or receiving services.

How your information in ClientTrack may be used or disclosed:

Unless restricted by other laws, and after you have signed a client consent form, your information will be used: (1) to provide individual case management, services, and/or treatment to you and your family at this victim service provider; (2) for statistical purposes, such as determining the number of persons that are homeless; (3) to track individual program-level outcomes; (4) to identify unfilled service needs and plan for the provision of new services; (5) to obtain payment for services provided to you; (6) for quality assessment, training, evaluation, legal and business planning, and other health care operations; (7) to allocate resources among agencies engaged in the provision of services; and (8) in other uses allowed by law.

The information about you can also be used by or disclosed to the following:

- Authorized individuals who work for this victim service provider, for administrative purposes related to providing services to you or your family, or for billing or funding purposes.
- Auditors or others who review the work of this victim service provider or need to review the information to provide services to this victim service provider.
- The ClientTrack System Administrator, IHCDA and its designees, and the ClientTrack developer, ClientTrack, Inc., and other individuals involved in maintaining ClientTrack. They may see the information for administrative purposes (for example, to check data errors).
- Individuals performing academic research who have signed a research agreement with this victim service provider or IHCDA. Your name, social security number or other identifying information will not appear in any research report.
- This victim service provider, IHCDA, or its subcontractor to create data that has your identifying information removed.
- Government or social services agencies that are authorized to receive reports of infectious disease, abuse, neglect or domestic violence, when such reports are required by law or standards of ethical conduct.
- A coroner or medical examiner or funeral director to carry out their duties.
- Authorized federal officials for the conduct of certain national security or certain activities associated with the protection of certain elected officials.



- Law enforcement officials, but the disclosure must meet the minimum standards necessary for the immediate purpose and not disclose information about other individuals. A court order or search warrant may be required.
- Others, to the extent that the law specifically requires such use or disclosure.
- To others to prevent or lessen a serious and imminent threat to the health or safety of a person or the public, if the disclosure is made to a person or persons reasonably able to prevent or lessen the threat or harm, including the target of a threat.

You may revoke your consent at any time in writing, however if the victim service provider has already released your information as a result of your previous consent, we will only be able to prevent future disclosures.

Your rights regarding your information in ClientTrack:

- You have the right to inspect and obtain a copy of your own protected personal information for as long as it is kept in ClientTrack, except for: (1) Information compiled in reasonable anticipation of litigation or comparable proceedings; (2) information about another individual (other than a health care or homeless provider); (3) information obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) if disclosure would reveal the source of the information; or (4) information, the disclosure of which would be reasonably likely to endanger the life or physical safety of any individual.
- You have the right to request that your protected personal information be corrected when the information in the record is inaccurate or incomplete.
- You have a right to request that your personal information be provided to you by alternative means, (such as by mail or telephone), or at alternate locations (such as at your home or place of work). This victim service provider will accommodate reasonable requests.
- You have the right to receive a list of disclosures of your protected personal information made by this victim service provider during the six years prior to the date you request this information, except for disclosures for national security or intelligence purposes or to correctional institutions or law enforcement officials. If a law enforcement official or health oversight victim service provider requests that we temporarily suspend giving you an accounting of disclosures made to them, the request must be time-limited and given to us in writing.

Exercising your rights regarding your information in ClientTrack:

You can exercise these rights by making a written request to this victim service provider, or by making a written request to IHCDA. The addresses are listed at the end of this notice.

Enforcement of your privacy rights:

If you believe your privacy rights have been violated, you may send a written complaint to this victim service provider. If your complaint is not resolved to your satisfaction, you may send your written complaint to IHCDA. Contact information is listed at the end of this notice. You will not be retaliated against for filing a complaint.

This victim service provider is required by law to maintain the privacy of your protected personal information, and to display a copy of the most recent ClientTrack Notice of Privacy Practice (“Notice”). This victim service provider reserves the right to change the Notice from time to time, and if it does, the change will affect all of the information in ClientTrack, not just the information entered after the change. The revised Notice will be posted by this victim service provider. You may request a copy of it from this victim service provider or IHCDA.



[INSERT VICTIM SERVICES PROVIDER NAME, TELEPHONE NUMBER, FAX NUMBER AND E-MAIL]

Victim Service Provider Name: _____
Telephone: _____
Facsimile: _____
Email: _____

INDIANA HOUSING AND COMMUNITY DEVELOPMENT AUTHORITY
30 S. Meridian St., Suite 1000
Indianapolis, IN 46204

If you have any questions about this Notice or need further information, you may request it from:
ClientTrack System Administrator: 317.232.7777 or the help desk at: DVHelpDesk@ihcda.in.gov