

GA HMIS Privacy Policy Temporary Emergency Addendum – April 2, 2020

In response to the Coronavirus (COVID-19) pandemic, on March 14, 2020, Governor Brian Kemp declared a state of public health emergency for the State of Georgia. On April 2, 2020, Governor Kemp ordered that Georgia residents and visitors shelter-in-place, restricting travel and in-person interactions to essential business only. While the assistance provided to the homeless population during this critical time period is essential business, due to the emergence of the Coronavirus (COVID-19) the requirement for physical distancing has been implemented. Physical distancing has impacted the ability to obtain client's written consent to share their information in the Homeless Management Information System (HMIS), which is needed to provide critical services to the clients.

The HMIS Privacy Policy states that "DCA may amend this notice and change the policy or practices at any time. Amendments may affect personal information that DCA or the GA HMIS Participating Agencies obtained before the effective date of the amendment." In accordance with section C. Usage and Disclosure of Personal Information, item E., disclosure of personal information is allowable for the following purpose.

To avert a serious threat to health or safety if:

- It is believed in good faith that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
- The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

In alignment with HUD's COVID-19 HMIS Set-up and Data Sharing Practices guidelines to the Coronavirus pandemic, DCA has determined that this impairment of the need to continue to serve clients requires a temporary modification to the GA HMIS Privacy Policy.

Therefore, effective April 2, 2020, a client's consent to share their HMIS records will be accepted in both written and verbal formats.

For the client's verbal consent to be accepted, the servicing agency must certify that the client:

- 1) Was fully informed of the HMIS Privacy Policy, and this Temporary Emergency Addendum, and
- 2) Was provided instructions on how to obtain an electronic copy of the HMIS Privacy Policy and this Temporary Emergency Addendum.

This Temporary Emergency Addendum will be in effect for an interim period of sixty (60) days, upon which time it will be assessed and the need for its continuation or termination will be determined.