KnoxHMIS Guidance on Data Sharing during COVID-19 Response
March 30, 2020

This document offers information on KnoxHMIS data sharing for the purpose of coordinating services to individuals and families experiencing homelessness and preventing/lessening threats to public health and safety during the COVID-19 crisis. The intention is to clearly articulate the means by which Knoxville-Knox County Continuum of Care, KnoxHMIS community partners, hospital staff, and public health officials may access and share specified KnoxHMIS data in order to carry out requisite public health measures.

Overall guidance for this document is sourced from The Department of Housing and Urban Development COVID-19 HMIS Setup and Data Sharing Practices March 2020 Bulletin[1] and HUD HMIS Privacy and Security Standards and COVID-19 Response March 2020 Bulletin[2]. The HMIS Privacy and Security Standards[3] gives providers a reasonable degree of flexibility regarding disclosure of information about participants without consent during a health epidemic (§ 4.1.3). Although most homeless providers are not covered entities under Health Insurance Portability and Accountability Act (HIPAA) regulation, note that these same permissions are granted under HIPAA and described in the Office for Civil Rights of the U.S. Department of Health and Human Services February 2020 Bulletin.[4]

This document details:
  I.   circumstances under which data can be shared,
  II.   authorized persons to receive and release information, and
  III. basic client information that can be shared.

I. Circumstances Under Which Data Can Be Shared

At this time, KnoxHMIS recommends that basic client information can be shared with authorized "essential service persons" during the community COVID-19 **response to assist in identifying the last known location and contact information** for individuals experiencing homelessness who may have been exposed to COVID-19, **so that the essential service provider can communicate results and needs for coordinating care directly with that individual.**

II. Authorized Persons to Receive and Release Information

During the COVID-19 response, KnoxHMIS is authorizing temporary licensed end-user access to "essential service persons" as deemed by the Knoxville-Knox County Continuum of Care (CoC) to be responsible for tracking down and coordinating care for individuals experiencing homelessness potentially exposed to COVID-19. In this situation, **authorized personnel designated by the CoC may include lead Knox County Health Department staff and/or local hospital staff charged with locating and communicating with persons exposed to COVID-19.** Designated individuals will be given read- only access to basic client information as detailed in section III of this document.

Should your agency directly receive verbal or written requests to release client information stored in KnoxHMIS for the purpose of COVID-19 care coordination, we ask that you follow typical protocol and redirect them to contact KnoxHMIS administration for further correspondence via this email: lhigginb@utk.edu

III. Basic Client Information That Can Be Shared

For the purposes of COVID-19 coordination, the HUD and HHS guidance outlines that the limited amount of information can be shared for these purposes.

Basic client Information that can be shared from KnoxHMIS includes:

- Name (3.01),
- Social Security Number (3.02) ,
- Date of Birth (3.03,)
- Gender (3.06),
- Client phone number,
- Client email address,
- Last known agency/location of client, and
- Case Manager/outreach worker

Please note that KnoxHMIS anticipates further guidance on best practice for tracking and sharing COVID-19 status among HMIS end-users should such action become necessary and will notify agencies via a separate guidance notice if further action is needed to track COVID-19 status in KnoxHMIS.

Questions regarding the information in this document should be directed to KnoxHMIS administration at lhigginb@utk.edu.

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[1] https://files.hudexchange.info/resources/documents/COVID-19-HMIS-Setup-and-Data-Sharing.pdf
[2] https://hudexchange.us5.list-manage.com/track/click?u=87d7c8afc03ba69ee70d865b9&id=f900dd1087&e=b304cea7c9
[3] https://files.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf
[4] https://www.hhs.gov/sites/default/files/february-2020-hipaa-and-novel-coronavirus.pdf