



## Notice of Privacy Practices

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

### Introduction

HOM, Inc. (“HOM”) is a company providing housing services in Maricopa County, Arizona. HOM is not a “covered entity” under HIPAA. HOM does, however, have access and a need to use the minimum necessary elements of an individual’s health record or personal information record to assist with the identification, procurement and management of housing targeted for special needs families and individuals in the county’s behavioral health, Medicaid funded, and homeless services systems of care.

We believe that this hybrid relationship merits our disclosure of how we manage these records and the information in the records although HOM maintains no health or other privacy records of its own. Moreover, HOM executes all contracts and agreements, in accordance with HIPAA and HUD, necessary to assign the responsibility for, and care of, health and other private information. These are called “Business Associate Contracts” or “Business Associate Agreements.”

Accordingly, while we do not believe HOM is required to have a “Notice of Privacy Practices,” we think it a good practice and a responsibility we take seriously: maintaining your privacy in partnership with your health care and housing providers.

### Uses and Disclosures and Your Authorization

**Health care operations.** Your health information may be used as necessary to support the day-to-day activities and management of HOM. For example, information on the services you received may be used to support budgeting and financial reporting, and activities to evaluate and promote quality and to assist with locating housing for you.

**Housing Operations.** In accordance with the extensive privacy rules and regulations connected with HUD subsidized housing programs, HOM conforms its policies and procedures to protect your privacy when helping the Continuum of Care (homeless assistance) providers, both homeless services and supportive services, assist you with housing and supportive services.

**Law enforcement.** Your health information may be disclosed to law enforcement agencies to support government audits and inspections, to facilitate law-enforcement investigations, and to comply with government mandated reporting.

**Public health reporting.** Your health information may be disclosed to public health agencies as required by law. For example, we are required to report certain communicable diseases to the state’s public health department.

We ask that you help us and provide us with your consent for and authorization of these activities. If you change your mind after authorizing a use or disclosure of your information, you may submit a written revocation of the authorization. However, your decision to revoke the authorization will not affect or undo any use or disclosure of information that occurred before you notified us of your decision to revoke your authorization.

We often talk to landlords about our housing programs. We never discuss details of a client’s health matters with landlords, but landlords know the nature of our housing programs and how HOM receives referrals and from what agencies.

HOM does not have any additional uses of personal health information. HOM does not use personal health information for fundraising or marketing.



## Individual Rights

You have certain rights under the federal privacy standards. These include:

- The right to request restrictions on the use and disclosure of your protected health information
- The right to receive confidential communications concerning your services
- The right to inspect and copy your protected health information (if we have it available in some format allowing for reproduction)
- The right to amend or submit corrections to your protected health information if we have the ability to complete this request
- The right to receive an accounting of how and to whom your protected health information has been disclosed
- The right to receive a printed copy of this notice
- You also have rights granted to you by the federal agency Housing and Urban Development (HUD). The data management system called "HMIS" (Homeless Management Information System) includes these rights, and the homeless services or supportive housing services provider should explain these to you.

## HOM Duties

We are required by law to maintain the privacy of your protected health information as a Business Associate of other covered entities like your health care provider(s). Since we are not a covered entity, we are not required to provide you with this notice of privacy practices, but we think it is a better practice, even though not required, to tell you how we manage and maintain privacy of health and other personal information. We also are required to abide by the privacy policies and practices outlined in this notice. In the event of a breach of unsecured protected health information, if your information has been compromised it is our duty to report to the covered entity that maintains your health record and with which we have a business associate contract.

## Right to Revise Privacy Practices

As permitted by law, we reserve the right to amend or modify our privacy policies and practices. These changes in our policies and practices may be required by changes in federal and state laws and regulations. Upon request, we will provide you with the most recently revised notice on any office visit.

The revised policies and practices will be applied to all protected health information we maintain.

## Requests to Inspect Protected Health Information

You may generally inspect or copy the protected health information that we maintain. As permitted by federal regulation, we require that requests to inspect or copy protected health information be submitted in writing. You may obtain a form to request access to your records by contacting your Housing Specialist or Chief Programs Officer. Your request will be reviewed and will generally be approved unless there are legal or medical reasons to deny the request.

## Complaints & Contact

If you would like more information or to submit a comment or complaint about our privacy practices, you can do so by sending a letter outlining your concerns to:

Chief Operations Officer  
HOM, Inc.  
3829 N 3<sup>rd</sup> St. Ste 101  
Phoenix, AZ 85012  
602-265-4640

If you believe that your privacy rights have been violated, you should call the matter to our attention by sending a letter describing the cause of your concern to the same address. You will not be penalized or otherwise retaliated against for filing a complaint.

This notice is effective on or after April 1, 2017.

