Client Consent and HMIS Release of Information Frequently Asked Questions

A Client Consent to Data Collection and Release of Information (ROI) must be completed for each client who consents to have their personally identifiable information (PII) entered into the ClientTrack HMIS system.

What is Personally Identifiable Information (PII)?

- PII is any information that can be used to distinguish or trace an individual's identity, either directly or indirectly.
- **Examples:**
    - Full name
    - Address
    - Social Security number (SSN)
    - Email address
    - Phone number
    - Date of birth
    - Biometric data (fingerprints, retinal scans)
    - IP address
    - Passport number
    - Driver's license number
    - Medical records
    - Financial information

Release of Information (ROI) Collection Tools

A client can consent by reviewing and signing a paper version of the ROI and having the service provider scan and upload the signature page into HMIS to document check* in the client's profile.

**For instructions on how to navigate to the document check folder, see Chapter 4: Client Workspace: Menu Options, Folders, and Subfolders/Document Check in the HMIS Basic User 2026 Manual.*

The HMIS Basic User 2026 Manual includes detailed instructions on the ROI process and includes instructions on how to enter de-identified information for clients who do not consent, or for whom deidentified PII is required, such as clients actively fleeing domestic violence and clients disclosing their HIV status within HMIS. If you have any questions or concerns regarding ROI and PII, please reach out to a supervisor or email us at hmis@changinghomelessness.org.

General Release of Information Questions

1. Can I obtain verbal consent to enter and share a client's PII in HMIS?

   Yes. However, consent with a signature is strongly preferred.

Obtaining and Documenting Consent

2. Am I required to obtain an ROI from a client?

   Yes. When creating a new client profile in HMIS, all providers are required to document whether a client consents to sharing identifying information in HMIS. For clients who consent, an ROI must be electronically signed or uploaded via "Document Check" in HMIS*. Not only does this ROI provide legal documentation of a client's consent, but having identifying information in HMIS allows providers to more easily serve clients as well as better document of services clients are receiving across the continuum and assist in the documentation of chronic homelessness.

3. Is it okay to scan and upload the signature page only?

   Yes. Where the ROI itself is a multi-page document uploading just the signature page of the ROI is acceptable.

4. How do I know whether my client has an ROI on file?

   An ROI can be found in the client profile's Document Check*.

   **For instructions on how to navigate to the document check folder, see Chapter 4: Client Workspace: Menu Options, Folders, and Subfolders/Document Check in the HMIS Basic User 2026 Manual.*

5. Who is responsible for adding the ROI?

   The agency who initially enters client information into HMIS is responsible for documenting consent status in HMIS, and for adding the ROI for clients who consent.

6. Does every agency need to complete an ROI for every client they work with?

   No. A client should only be asked to complete the ROI one time; client information is stored for 7 years after the last recorded service in HMIS.

7. What do I do if my client's profile contains identifying information (name, SSN, exact DOB), but no ROI has been added?

If no ROI has been added for an identified client, either have the client fill out an ROI from your agency and/or contact the most recent agency serving the client to obtain a copy of their ROI to request that agency add their ROI to HMIS. If a client no longer consents, de-identify the client record*, do not attempt to di-identify a client. Have them or the identified member (if adult) sign a revocation of consent form* and reach out to hmis@changinghomelessness.org. The HMIS administration team will ensure the client's PII is deidentified properly.

**For a copy of the HMIS Client Revocation of Consent Form, please visit changinghomlessness.org and navigate to HMIS Resources, or reach out to hmis@changinghomelessness.org, and the HMIS team will send a copy.*

Households (Families) and ROI

8. Does every member of a household need to complete a separate ROI?

   Yes. Each household member must sign an individual ROI. Parents can sign for children under 18. Each ROI should be added under the specific client's document check*. Only unaccompanied youth aged 13 through 17 can sign an ROI for themselves. When they are with a parent or guardian, the parent or guardian will sign for them. Client identity could be determined through the identities and relationships of family members. Therefore, all members of a family must be deidentified if consent is refused for any one member.

   ** For instructions on how to navigate to the document check folder, see Chapter 4: Client Workspace: Menu Options, Folders, and Subfolders/Document Check in the HMIS Basic User 2026 Manual.*

9. Should a minor who is part of a household sign their own ROI once they turn 18?

   Yes. The individual client who turned 18 years old should now sign their own ROI to replace the version signed by the parent/guardian when the individual was a minor. The client can remain part of the household in HMIS like any other adult household member.

10. Can a client sign the ROI for their spouse?

    No. A client may only sign the ROI for themselves and for their children who are under the age of 18.

11. Does every member of a household need to complete a separate ROI?

    Yes. Each household member must sign an individual ROI. Parents can sign for children under 18. Each ROI should be added under the specific client's document check*. Only unaccompanied youth aged 13 through 17 can sign an ROI for themselves.

Client identity could be determined through the identities and relationships of family members. Therefore, all members of a family must be deidentified if consent is refused for any one member.

** For instructions on how to navigate to the document check folder, see Chapter 4: Client Workspace: Menu Options, Folders, and Subfolders/Document Check in the HMIS Basic User 2026 Manual.*

12. What if some family members are identified and my client declines consent for themselves or their child?

    If a client declines consent, but their family members are already identified in the system, have them or the identified member (if adult) sign a revocation of consent form. Then contact hmis@changinghomelessness.org to have them de-identified. Client identity could be determined through the identities and relationships of family members. Therefore, all members of a family must be deidentified if consent is refused for any one member.

Non-Consenting Clients and Revoking Consent

13. What if my client wants to revoke their consent to having identifying information entered in HMIS?

    If a client no longer consents, de-identify the client record*, do not attempt to di-identify a client. Have them or the identified member (if adult) sign a revocation of consent form* and reach out to hmis@changinghomelessness.org. The HMIS administration team will ensure the client's PII is deidentified properly.

    **For a copy of the HMIS Client Revocation of Consent Form, please visit changinghomlessness.org and navigate to HMIS Resources, or reach out to hmis@changinghomelessness.org, and the HMIS team will send a copy.*

14. What if a client tells me they don't consent, but I see that they have an ROI entered into HMIS?

If a client has an ROI entered into HMIS, the client is considered consenting until they complete and submit a Revocation of Consent form. The Revocation of Consent form is available by contacting hmis@changinghomlessness.org.

15. What if I see that my non-consenting client has another identified profile in the system?

First, determine whether the identified profile has an ROI entered in HMIS. Each ROI should be added under the specific client's document check.* If the client has a consenting ROI that's dated more recently than your non-consenting ROI, the client is considered consenting until they submit a Revocation of Consent form. If your non-consenting ROI is newer, that ROI takes precedence, and the client should remain de-identified. Once you've determined whether the client should be identified or de-identified in the system, you can contact hmis@changinghomelessness.org to have the two profiles merged, keeping either the identified or de-identified profile as appropriate.

** For instructions on how to navigate to the document check folder, see Chapter 4: Client Workspace: Menu Options, Folders, and Subfolders/Document Check in the HMIS Basic User 2026 Manual.*

<u>De-Identified Populations</u>

16. What do I do if my client is actively fleeing a domestic violence (DV) situation?

If a program is a Victim Service Provider, identifying information should not be entered for a client. No personally identifying information may be entered for any client actively fleeing domestic violence (in compliance with S.3623 - Violence Against Women Act Reauthorization Act of 2022. If a program is not a Victim Service Provider but services are being provided for a client who is actively fleeing domestic violence, assist the client in making an informed decision about whether having identifying information in HMIS that could compromise their safety. In some cases, it may be appropriate to create a new, de-identified profile for your client to only be used a program, regardless of whether an existing profile in the system. To enter a de-identified profile, follow the process outlined in the HMIS Basic User 2026 Manual. If a client is now actively fleeing domestic violence and wants to revoke consent after previously consenting, contact hmis@changinghomelessness.org to have the profile de-identified. The client does not need to complete a Revocation of Consent form. If the client chooses to not consent to having identifying information in HMIS, they may still wish to provide their Client ID (HMIS #) to other providers utilizing ClientTrack's Changing Homelessness HMIS in the Northeast Florida Continuum of Care or Georgia Balance of State Continuum of Care to avoid creation of duplicate records.

17. What do I do if my client is disclosing their HIV+ status within HMIS?

Unless a client is enrolled in a HOPWA-funded program, it is not necessary to document HIV status in HMIS and thus not a requirement to de-identify your client. However, if enrolling a client in a HOPWA-funded program, refer to the HOPWA Confidentiality User Guide. If creating a new profile for a client whose HIV+ status is being disclosed in HMIS, follow the process outlined in the User Manual to create a de-identified profile for your client. If a client already has a profile containing identified information, contact the hmis@changinghomelessness.org to have the profile de-identified. The client does not need to complete a Revocation of Consent form. Be sure to provide the client with their ClientTrack HMIS Client ID number in order to avoid potential future duplication of the client's record.

18. What do I do for an agency or program is known in the community to only serve HIV+ clients?

If a program has been identified by Northeast Florida Continuum of Care or Georgia Balance of State Continuum of Care as one who should follow a special protocol, then users are instructed to never enter identifying information for any client served by the program. No personally identifying information may be entered so that a client's HIV status cannot be inferred by affiliation with a program. The profiles created should only be used by the agency and no effort should be made to merge or de-duplicate this profile with any other in HMIS. To enter a de-identified profile, follow the process outlined in the HMIS Basic User 2026 Manual*.

* *For instructions on best practices on preventing duplicate clients, see Chapter 4: Client Workspace: Menu options, Folders, and Subfolders/HMIS Intake in the "HMIS Basic User 2026 Manual."*

Unaccompanied Youth

19. What are the requirements for consent for unaccompanied youth (under 18)?

Any unaccompanied youth aged 13 or older may consent to have their personally identifying information collected for the purposes of HMIS. The term unaccompanied is defined as a youth or young adult experiencing homelessness while not in the physical custody of a parent or guardian.

20. Does an individual (who has consented as a minor) need to re-sign the HMIS consent form as an adult? (Do they need to re-sign the consent upon turning 18)?

    No. The consent form is the same for Unaccompanied Youth and Adults. Client information is stored in the database for 7 years after the last date of service is recorded in HMIS.

21. Is there a Youth-specific HMIS consent form developed that provides the same info in simple, youth-focused language?

    No. There should always be a conversation about HMIS with the person being served (youth or adult) to ensure the client understands the information and has the ability to ask questions.