

Coordinated Entry System (CES) Contributor Confidentiality Agreement

Purpose

The purpose of this confidentiality agreement is to ensure that all contributors to the Coordinated Entry System (CES) operated by the Community Alliance for the Homeless (CAFTH) understand and agree to abide by the confidentiality and data privacy requirements mandated by HUD and CES protocols. This agreement ensures that sensitive client data is protected and handled appropriately, in alignment with the Housing First principles and other HUD guidelines.

Key Responsibilities of CES Contributors

As a CES contributor, you are responsible for the following:

1. Confidentiality of Client Data

All client data shared within the CES, including information recorded in HMIS or the Comparable Database (CDB), must be kept confidential. Contributors must not disclose any Personally Identifiable Information (PII) about participants without explicit written consent from the participant, as outlined in the Release of Information (ROI) policy.

2. Compliance with HUD CES Requirements:

All contributors must comply with the following federal laws and regulations:

- a) **Fair Housing Act:** Protects against discrimination based on race, color, religion, sex, national origin, disability, or familial status.
- b) **Section 504 of the Rehabilitation Act:** Prohibits discrimination based on disability in programs receiving federal financial assistance.
- c) **Title VI of the Civil Rights Act:** Prohibits discrimination based on race, color, or national origin in programs receiving federal assistance.
- d) **Americans with Disabilities Act (ADA):** Prohibits discrimination based on disability in public and private housing-related services.

3. Data Security

Data collected and stored within HMIS or the CDB must be protected. CES contributors must adhere to all HUD and CAFTH security protocols to safeguard client information from unauthorized access or disclosure. No data is to be shared via screenshots, pictures, or any other non-secure methods.

4. Informed Consent & Client Rights

Before conducting assessments or entering client data into the CES, contributors must:

- a) Ensure the client has been informed of how their data will be collected, used, and stored.
- b) Obtain and document the client's written consent
- c) Inform clients of their right to refuse to answer specific questions without affecting their access to housing services.

5. Prohibition on Retaliation and Discrimination

Contributors are prohibited from retaliating against or discriminating against any client based on their answers, protected class status, or engagement in CES services. Clients are to be treated equally, regardless of substance use history, criminal background, or other barriers to housing.

CES Contributor Training Requirements

All CES contributors must:

- a) Complete initial CES training, including understanding HUD, CES policies, procedures, and confidentiality protocols.
- b) Attend annual CES trainings to stay updated on system changes and enhancements.
- c) Complete refresher courses as required, especially when significant changes are made to CES operations.

Obligations in Case of Breach

In the event of a confidentiality breach, CES contributors must:

- a) Immediately notify the CES facilitator.
- b) Participate in any investigations or reviews conducted by CAFTH.
- c) Take corrective actions as recommended by the CES team and comply with any follow-up training or sanctions imposed.

Signatures

By signing below, I acknowledge that I have read, understood, and agree to comply with the terms of this confidentiality agreement. I understand that failure to adhere to these confidentiality guidelines may result in disciplinary action, including the potential loss of access to CES resources.

Name of CES Contributor: _____

Agency: _____

Signature: _____

Date: _____