MINOR ADJUSTMENTS GROUP, INC.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) CLIENT PRIVACY POLICY & NOTICE

In Compliance with HUD HMIS Standards & NJ Department of Community Affairs Baseline Policies

> **Notice of Openness & Transparency:** Minor Adjustments Group, Inc. participates in the New Jersey Homeless Management Information System (NJ HMIS) and partner care networks. This notice describes how personal and health-related information about you may be used and disclosed, and how you can access this information. *A paper copy of this complete policy is available to all clients upon request, and the current version is published on our agency website.*

1. WHAT IS THE NEW JERSEY HMIS?

The Homeless Management Information System (HMIS) is an electronic database used by housing providers across New Jersey to coordinate housing, shelter, healthcare, and supportive services for individuals and families experiencing or at risk of homelessness. By collecting accurate information, participating organizations improve care coordination, eliminate duplicate paperwork, and track progress toward securing permanent, stable housing.

2. WHAT INFORMATION WE COLLECT

We only collect personal information that is relevant, necessary, and lawful for providing housing assistance and health-related support services. This data may include:

- **Basic Identification:** Full name, date of birth, gender, social security number, contact details, and emergency contacts.
- **Housing & Homeless History:** Prior living arrangements, housing status, duration of homelessness, and previous shelter/housing stays.
- **Income & Benefits:** Household income, employment, public benefits (SNAP, SSI/SSDI, TANF), and Medicaid/NJ FamilyCare health plan details.
- **Health & Special Needs:** Self-reported physical health, mental health, substance use recovery history, and disability accommodations required to support your housing stability.

3. HOW WE USE AND DISCLOSE YOUR INFORMATION

Your protected personal information (PPI) is strictly protected and only shared as allowed under federal, state, and program standards. We use and share your information to:

- **Coordinate Direct Services:** Connect you to pre-tenancy navigation, landlord engagement, security deposit funds (Move-In Supports up to $10,000), and tenancy sustaining services.
- **Obtain Program Funding & Approvals:** Verify program eligibility with the State of NJ Division of Medical Assistance and Health Services (DMAHS) and contracted Medicaid Managed Care Organizations (e.g., Horizon NJ Health, Fidelis Care NJ, UnitedHealthcare, Aetna).
- **Comply with Administrative & Reporting Mandates:** Provide de-identified, non-personally identifiable statistical reports to HUD, the NJ Department of Community Affairs (DCA), and regional Continua of Care (CoC).
- **Avert Serious Threats to Safety:** Information may be disclosed if necessary to prevent or lessen a serious and imminent threat to the health or safety of you or the public, or as required by mandatory state reporting laws (such as child or vulnerable adult abuse/neglect).
- **Legal Requirements:** Disclose information when strictly required by a court order, warrant, or valid subpoena.

4. DATA SECURITY & CONFIDENTIALITY STANDARDS

Minor Adjustments Group, Inc. enforces strict physical, technical, and administrative safeguards to protect your confidential information:

- **Federal Privacy Protections:** Our systems and files operate in full compliance with HIPAA standards and Title 42 of the Code of Federal Regulations Part 2 (42 CFR Part 2) governing substance use confidentiality.
- **Encryption & Access Controls:** All electronic data transmitted across networks utilizes minimum 128-bit encryption. System access is password-protected, tracked via automated audit trails, and restricted solely to authorized direct-service staff.
- **Physical Security:** All physical records, intake forms, and paper files are securely locked in supervised, restricted-access office areas when not in direct use.
- **7-Year Retention & Disposal:** In accordance with NJ HMIS Section 4.2.2 standards, records are maintained securely and disposed of after a minimum of seven (7) years following program exit or last activity.

5. YOUR RIGHTS AS A CLIENT

As an applicant or participant receiving housing support services, you have the following protected rights:

- **Right to a Copy:** You have the right to receive a printed paper copy of this complete Privacy Notice at any time upon verbal or written request.
- **Right to Inspect Your Record:** You have the right to view and obtain a copy of your electronic HMIS record and file. We will provide an authorized staff member to review your records with you and answer questions.
- **Right to Request Corrections:** If you believe any information in your record is incorrect or incomplete, you may request an amendment. While original legal entries cannot be erased, your written statement of disagreement or corrected information will be added to your official record.
- **Right to an Accounting of Disclosures:** You have the right to request an accounting of disclosures made outside of standard routine administrative and care-coordination functions over the preceding six (6) years.
- **Right to Nondiscrimination:** Exercising your privacy rights or refusing voluntary third-party data sharing will not result in denial of essential emergency housing navigation services.

6. AMENDMENTS TO THIS PRIVACY NOTICE

Minor Adjustments Group, Inc. reserves the right to amend this notice at any time to reflect updates in HUD standards, state policies, or organizational practices. Any amendments will apply to all records currently maintained. An updated version will always be posted in our intake office and published on our website.

7. CLIENT GRIEVANCE & PRIVACY OFFICER CONTACT

If you have questions, believe your privacy rights have been violated, or wish to file a formal grievance regarding the handling of your data, you may submit a complaint directly to our agency Privacy Officer without fear of retaliation:

MINOR ADJUSTMENTS GROUP, INC. — PRIVACY & COMPLIANCE OFFICE

Officer in Charge: Michael L. Williams Jr., Executive Director / CADC, NCPRSS
Physical Address: 1239 Rosalie Lane, Vineland, NJ 08360
Mailing Address: PO Box 655, Absecon, NJ 08201
Toll-Free Phone: 1-888-233-3299 • **Direct:** (856) 466-7526
Email: admin@minoradjustments.org • **Website:** www.minoradjustments.org