Global Visibility Consent and Privacy

January 20,2026

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What Does Client Consent Mean?

In HMIS, the Client Consent (Release of Information) is the way we document a client's decision about whether their information is entered into HMIS and how broadly it can be shared with other HMIS-participating agencies. This is a required privacy step because clients must be provided access to the privacy policy and consent forms before data is entered, so they can make an informed choice. The consent selection directly determines the client's sharing level going forward, including whether their information is handled as Full Sharing, Limited Sharing, or No Sharing under the updated consent.

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Why Consent Matters

Client consent matters because it balances two important needs: (1) protecting client privacy and choice, and (2) supporting effective service coordination and housing placement. When clients choose to share information in HMIS, it helps agencies understand what services the client has already received, reduces the need for clients to repeatedly provide the same information, and can support timely connections to housing opportunities when clients are prioritized.

Global Visibility makes this even more important because more components of an unlocked client record (including services, case notes, and attachments) will be visible across agencies going forward, which means the consent must be treated as an initial step, not as an afterthought.

Consent Expiration

Client consent does not automatically expire; it remains in effect unless the client updates or revokes their choice by completing a new consent form. Clients can change their sharing level at any time, and the most recent ROI documentation is treated as the client's current consent choice in practice. It is also important for staff to understand that updates to consent apply going forward and not retroactively. Actions taken or data shared made based on the prior consent will still stand. Because consent can change as client circumstances or comfort levels change, documenting it clearly and keeping it current is a key part of maintaining both privacy and effective coordination

- In HMIS, the most recently documented ROI is what should be treated as the client's current consent choice, so when a client updates their selection, staff should document it as a new consent/ROI record (not as an edit to an older one).

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Client Consent Update

The updated Client Consent Form is written to be more client-facing and to better reflect how HMIS information is used and protected. The form now clearly explains the purpose of HMIS data collection, the benefits of sharing, and the ways HMIS information may be used beyond direct service coordination (such as reporting and research/analysis). The form also adds clearer privacy and process language. Clients are explicitly informed that they have the option to skip questions, they are given instructions for reporting suspected misuse to the HMIS Helpdesk, and the form clarifies that clients may update or revoke their choice later by completing a new consent form.

All clients in a household must sign and complete a separate consent.

Chicago Homeless Management Information System Client Consent Form for Data Sharing

Purpose of this Form
To better serve you and at times because of funder requirements, we ("our organization") would like to obtain information about you and enter this information into a database called the Homeless Management Information System (HMIS) so this information can be shared with other organizations who may be able to provide you services. To do so, we need your consent. If you have any children under age 18, you also will be asked to decide how their information will be shared and sign a separate consent form for each child.

What are the Benefits of Sharing Your Information?
- It informs us and other organizations that use HMIS of the services you receive here, which allows us and them to better serve you and helps us locate other programs for which you may be eligible.
- You will not have to provide all your information each time you seek services.
- If you become prioritized for housing, the organizations that participate in HMIS may be notified. As a result, they may inform you about the housing opportunity when you seek services from them.

How Else May We Use this Information?
- To help with payment for services provided, carry out administrative functions of the programs, and comply with government and funder reporting obligations.
- To help understand how the homeless response system operates so we can improve services and supports for people experiencing homelessness.
- For data analysis, community reporting purposes, or academic research.
- When required by federal and state laws.
- As further described in the Standard Agency Privacy Policy, as may be amended from time to time.

How Is Your Data Protected?
- Every organization that participates in HMIS is required to comply with the Standard Agency Privacy Policy.
- Members of our organization and all organizations that use HMIS must sign an agreement to protect your privacy and comply with applicable state and federal laws.
- HMIS complies with or meets industry-standard security requirements.
- There is a small risk of a security breach, and someone might obtain and use your information inappropriately. If you ever suspect the data in HMIS has been misused, immediately contact the HMIS System Administrator at helpdesk@allchicago.org.

You May Skip Questions
- If you choose to share your information in HMIS, we recommend that you answer all the questions, but you can skip any question you want. In some cases, this can make it more difficult to receive the services for which you may be eligible.

What if You Change Your Mind?
- You can make changes regarding the sharing of your information or revoke your consent at any time by completing and signing a new Consent Form.
- A change or revocation is not effective to the extent that we or another organization acted in reliance on your previous consent to disclose information. Information that was previously disclosed may be subject to redisclosure.
- Your information will not be shared from the date you sign a new Consent Form revoking your consent and going forward.

Additional Authorization may be Required Under HIPAA or Other Laws
- If our organization is a covered entity under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), we may request that you sign a HIPAA authorization to release protected health information. In the event the health information you provide includes a category of sensitive health

Supplemental Consent Removed

The previous "Supplemental Client Consent" for certain disability and health information is being removed from the consent packet. Instead of handling this through a separate supplemental form, the updated consent language recognizes that sensitive categories of information may be involved and clarifies that additional authorization may be required under HIPAA or other laws, depending on the agency and the type of information being disclosed. In practice, this simplifies the consent packet for most clients, while still preserving the requirement to handle sensitive information appropriately and obtain additional authorizations when required.

Updated Picklist Options

The consent picklist options in HMIS are being updated to match the new form language and align with how data will function in a shared system. In a global system, these two options are especially important because they determine whether the client's newly entered data is treated as broadly visible across agencies or restricted to a narrower group.

- Full Sharing means the client's information is entered into HMIS and shared with all agencies that use HMIS, supporting broad coordination and reducing the need for repeated data collection across agencies.
- Limited Sharing means the client's information is still entered into HMIS, but sharing is restricted to the client's current agency, HMIS System Administrators, and the Coordinated Entry team.

Full Sharing ☐
I choose to have my information entered into HMIS and shared with all organizations that use HMIS.

Limited Sharing ☐
I choose to have my information entered into HMIS and shared only with this organization, the system administrators who run the HMIS database, and the team who coordinates referrals to housing, also called the Coordinated Entry team. This may limit the types of other services I receive and will mean I have to redisclose all of my information if I seek services elsewhere.

Information from Survivors of Domestic Violence and/or Human Trafficking should automatically be set to Limited Sharing by the staff entering the data

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Updated Picklist Options - No Sharing

No Sharing is the most significant operational change in the updated consent language. Under No Sharing, the client chooses not to have their information entered into HMIS, which means the system cannot support cross-provider coordination or shared visibility for that client through HMIS. This is particularly important in the context of global visibility, because the shared system model depends on HMIS participation: if no record is entered, there is no HMIS data to be visible or used for coordinated workflows. The form clarifies that emergency services may still be provided to the extent possible, but the client may have reduced access to housing and service opportunities that rely on HMIS participation and coordinated referral processes.

- The updated form states that **No Sharing means the client's information is not entered into HMIS at all**, and this may reduce eligibility for housing and other service opportunities that rely on HMIS participation.

No Sharing ☐

I choose not to have my information entered in HMIS. I understand that as a result, this organization may not be able to offer me as many services, but that it will provide as many emergency services as it is able. I also understand that I may not be eligible for as many housing or other service opportunities.

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Updated Picklist Options - No Sharing

When a client selects "No Sharing," staff must first explain the impact in plain language: the client's information will not be entered into HMIS, which may limit access to housing or programs that require HMIS participation, while emergency services will still be provided whenever possible. After confirming the client understands, the agency must shift to secure offline documentation. Even though HMIS entry is not permitted, projects still must maintain records of client engagement and outcomes, including the same HUD-required data elements (Universal and Program-Specific Data Elements) that would normally be collected in HMIS for reporting and compliance.

For DFSS funded Emergency Shelters, additional compliance steps apply. **If you are serving more than one or two clients without HMIS records at the same time, notify DFSS immediately.** These clients must also be included in your quarterly utilization reports, with clear notes indicating that they opted out of HMIS. Keep copies of signed ROIs and maintain detailed offline documentation for every service provided during their stay.

Introducing Consent to Clients

When introducing the consent form, frame it as a client choice and explain it before entering data. A simple way to open is: "We use HMIS to help coordinate housing and services. This form lets you choose how your information is handled and shared." Then briefly explain what HMIS information is used for (supporting services and housing, program operations and reporting), reinforce that the client can skip questions, and confirm that they can change their choice later by completing a new consent.

- Use a consistent introduction across your agency so clients hear the same explanation regardless of who completes the form. This reduces confusion and improves consistency in documentation.

- After explaining the options, ask the client to repeat back which option they chose and what it means, then have them document the choice. This helps confirm informed consent and prevents misselection or misunderstanding.

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Explain Consent Options to Clients

When explaining consent options, staff should use short, neutral language that clearly communicates the practical impact of each choice without pressure. A helpful approach is to present each option as a tradeoff: Full Sharing supports coordination, Limited Sharing restricts sharing to a smaller group, and No Sharing means information is not entered into HMIS. Keep the explanation focused on what the client can expect and what changes in practice.

- Avoid technical terms (e.g., "visibility," "locked") and instead use outcomes clients recognize (repeating information, ability to connect to housing opportunities)

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Keeping Data Safe in a Shared System

With Global Visibility, data entered for unlocked clients on or after the rollout date can be visible across agencies, which changes how staff should think about documentation. This includes components such as Service Transactions, Client Case Notes, and File Attachments items that staff may have historically used as if the audience were limited. In a more shared environment, the expectation is that documentation supports coordination and housing outcomes while protecting privacy through professional, minimal, and purpose driven entries. The safest default is to document only what is necessary to support housing/services and to assume that other authorized providers may read what is entered for an unlocked client.

Client Notes						Full Note
	Provider		Note Date	Note Preview		
Add New Client Note	Print			No matches.		

File Attachments						
	Date Added ▼	Name	Description	Type	Provider	Added From
Add New File Attachment			No matches.			

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Consent Overview

1. Use the new language consistently: explain as Full Sharing / Limited Sharing / No Sharing

2. Know what Limited Sharing means: the client's information is entered into HMIS but shared only with the client's organization, HMIS System Administrators, and the Coordinated Entry team.

   - If someone is a survivor of domestic violence or human trafficking, staff should set the record to Limited Sharing automatically

3. No Sharing is operationally different: it means the client's information is not entered into HMIS, which can limit housing and service opportunities that rely on HMIS participation.

4. The "current" consent is the most recent one: each enrollment should have ROI documentation, and the most recent ROI is treated as the client's current consent choice in practice.

5. Document with a shared-system standard: for unlocked clients after rollout, record components such as services, case notes, and attachments will be visible across agencies, so enter only what supports housing/service coordination and professional documentation.

Rollout Next Steps

Global Visibility is planned to go live in HMIS on Tuesday, **February 3rd**

We will be sending out an email on February 2nd, letting providers know that the system will be updated that evening. We will then follow up on February 3rd, letting providers know that everything was updated successfully.

Resources - Webinars

- Using a Shared System (Wednesday, January 21, 2026, 12:00 pm - 1:00 pm)

- Data Accuracy and Audit Tools (Tuesday, January 27, 2026, 12:00 pm - 1:00 pm)

- Reporting Impacts (Thursday, January 29, 2026, 12:00 pm - 1:00 pm)

Resources – Helpdesk Links

- HMIS Global Visibility Announcement

    - https://hmis.allchicago.org/hc/en-us/articles/34297099086484-HMIS-Global-Visibility-Announcement

- Client Consent (ROI)

    - https://hmis.allchicago.org/hc/en-us/articles/360000825243-Client-Consent-and-Supplemental-ROI

- How to Address "No Sharing" Consent

    - https://hmis.allchicago.org/hc/en-us/articles/41024096811284

Thank you