

# GetHelpOC™

## Policies and Procedures

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2-1-1 Orange County  
WWW.GETHELPOC.ORG | WWW.211OC.ORG

## Table of Contents

211OC: GetHelpOC™ Backbone Agency .....	3
I. Background & Purpose .....	4
II. Policies and Procedures Summary .....	5
III. 211OC Responsibilities.....	5-6
IV. Help Desk Policies.....	6
V. Agency Access.....	6-7
VI. Participating Agency Requirements .....	7
a. Submit an GetHelpOC™ CIE Participation Agreement .....	7
VII. Agreements.....	8
VIII. GetHelpOC™ User Access Roles .....	8
IX. GetHelpOC™ User Requirements.....	8-9
a. GetHelpOC™ users must complete the following trainings:.....	9
X. Referral Manager Requirements.....	9
XI. Technical Standards.....	10
XII. Privacy.....	10-13
XIII. Data Use and Disclosure.....	13
XIV. Data Release .....	13
XV. Data Breach .....	14

## Key Terms and Acronyms

All documents referenced in the GetHelpOC™ Policies and Procedures can be found on the GetHelpOC.org website unless otherwise noted.

Term	Acronym (if applicable)	Definition
2-1-1 Orange County	211OC	GetHelpOC™: a Community Information Exchange backbone Agency and platform administrators.
Bi-directional referral(s)		Electronically sharing pointed referrals with client details between organizations. Bi-directional, closed-loop referrals enable partner organizations to streamline the delivery of person-centered care, monitor individuals' progress, and capture real-time outcomes.
Care Coordination or Coordinated Care		Care coordination involves deliberately organizing individual care activities and sharing information among all participants concerned with an individual's care to achieve safer and more effective care.
Case Manager User		The GetHelpOC™ User designated by their agency responsible for the case management of clients referred through the system to the agencies service.
CIE Advisory Council		Council of agencies (nonprofits, public sector and health care) whose responsibilities include being a thought partner, advocate, and ambassador for the governance of GetHelpOC™.
CIE Agency Agreement		The agreement form between GetHelpOC™ participating agencies and 211OC that specifies the rights and responsibilities of the participating agency and 211OC regarding the use GetHelpOC™.
Closed-loop Referrals		Logging outcomes of what happened to a referral.
Community Information Exchange	CIE	Nationally recognized model for collaborative data sharing across multi-disciplinary network partners with the following core components: network of partners, shared language, bi-directional closed loop referrals, technology platform and data integration, and community care planning.
Community Partner Network	CPN	The Cohort of service agencies participating in collaborative data sharing, direct referrals, and holistic care coordination through GetHelpOC™.
Client Identifying Information	CII	Client Identifying Information, also known as Personal Protected Information (PPI), is a category of sensitive information that is associated with an individual person. This information should be accessed only on a strict need-to-know basis, handled and stored with care. This category includes but is not limited to: First names, last names, dates of birth, and Social Security Numbers.

Direct Referral		A pointed referral where client data is shared in real time and an email alert occurs to a GetHelpOC™ Community Partner Network agency.
Equity Cohort Lead	ECL	A group of diverse young professionals working on the front lines with the Equity Partners. They will be selected for the Equity Cohort because of their lived and learned experiences. The ECLs will learn and lead together for a year and inspire and challenge GetHelpOC's work.
GetHelpOC	GHOC	Orange County branded Community Information Exchange.
Health Insurance Portability and Accountability Act of 1996	HIPAA	The Health Insurance Portability and Accountability Act of 1996, particularly the Privacy Rule under Title II, regulates the use and disclosure of Protected Health Information (PHI) held by covered entities and business associates. HIPAA is the base operational privacy rule on which the GetHelpOC™ privacy rule is structured.
Opt-in/Authorization to Share Data		Direct client/individual consent to share information with authorized GetHelpOC™ users.
Referral Manager	RM	The GetHelpOC™ User designated by their agency responsible for the initial accept/denial of a referral to a service.
Salesforce		Salesforce is a cloud-based Customer Relationship Management (CRM) platform and the underlying platform that GetHelpOC™ was built on.
Technology Working Group	TM	A working group of technology experts who help drive, guide, and recommend best practices for the GetHelpOC™ technology.
Trusted Leaders Network	TLN	GetHelpOC's equity leadership strategy that builds the capacity of local community leaders who will inspire, inform, and hold GetHelpOC™ Network partners accountable.

## 211OC: GetHelpOC™ Backbone Agency

2-1-1 Orange County (211OC) is the backbone agency for GetHelpOC™: a Community Information Exchange.

**GetHelpOC™ Agency Contact Information:**

GetHelpOC™ Information Website	<a href="http://GetHelpOC.org/">http://GetHelpOC.org/</a>
GetHelpOC™ Training Website	<a href="https://211oc.ekadence.com/public/class/d7c6b8a9a9304ca6a92e5d3e7235ec0c">https://211oc.ekadence.com/public/class/d7c6b8a9a9304ca6a92e5d3e7235ec0c</a> Register as a Community Helper
	<a href="mailto:MMai@211oc.org">Contact: Michelle Mai, MMai@211oc.org</a> or <a href="mailto:AArambulo@211oc.org">Amy Arambulo, AArambulo@211oc.org</a>
GetHelpOC™ Partner Portal	<a href="https://gethelpoc.force.com">https://gethelpoc.force.com</a>
GetHelpOC™ Help Desk	<a href="mailto:MMai@211oc.org">Contact: Michelle Mai, MMai@211oc.org</a> or <a href="mailto:AArambulo@211oc.org">Amy Arambulo, AArambulo@211oc.org</a>

## I. Background & Purpose

Individuals & families must navigate many systems to access the care and services they need to be healthy. This journey is difficult – sometimes impossible – because there is little coordination between or within our healthcare, housing, behavioral health, government, and social services systems.

With the leadership of 2-1-1 Orange County (211OC), a network of cross-disciplinary community partners are working together to ensure that all in Orange County are served equitably, efficiently, and effectively. We are committed to ensuring that all in Orange County feel connected and supported.

GetHelpOC™ adopts a community information exchange model. In this model, a network of partners, including nonprofits, government, and physical & behavioral health providers, are committed to coordinating care and sharing data so that individuals & families have equitable access to the care and the support they need to improve their situation and to thrive.

**Individuals & Families benefit from:**

- No wrong door
- Reduced trauma by telling their story only once
- Control of their data
- Equitable connection to appropriate – culturally & geographical – care

**Service Providers benefit from:**

- Better awareness & access to community resources
- Reduced duplication of administrative efforts
- Streamlined referrals & information sharing
- Access to technology & tools to assess client’s comprehensive Social Determinants of Health

**Orange County Leaders benefit from:**

- Increased trust in our service systems
- Access to real-time, comprehensive data for planning
- Increased insight into inequities driving more informed & equitable allocation of resources & policies

GetHelpOC™ power of connection is a result of our:

- **Network Partners:** A collective approach with cross-disciplinary community members & partners,
- **Shared Purpose:** People-centered shared goals, tools, & outcome measurements,
- **Care Coordination:** Network Partners coordinate services
- **Technology:** A platform accessible to all Network Partners that integrates & leverages 211OC's Contact Center & Resource Database with other data platforms
- **Real-Time Data:** Data collected allows the Network Partners to identify & respond to needs quickly.

## II. Policies and Procedures Summary

This document serves as the minimum standards of participation in GetHelpOC™ and represents general best practices. Operational standards in this document are not intended to supersede grant-specific requirements and operating procedures as required by funding entities.

The GetHelpOC™ backbone, 211OC, will update this document at any time when necessary. Updates to this document will be announced to all Referral Managers via email and posted on the GetHelpOC™ website. The most recently updated version of this document is the only version that is considered valid and supersedes all previous versions.

## III. 211OC Responsibilities

- a. Provide GetHelpOC™ User training as needed.
- b. Develop and maintain training materials.
- c. Develop and maintain client forms, including opt-in/consent.
- d. Create GetHelpOC™ User accounts and control access to GetHelpOC™.
- e. Keep the GetHelpOC™ comprehensive resource database up to date.
- f. Communicate all system-wide changes to Referral Manager via direct emails, announcements on GetHelpOC.org and/or meetings.
- g. Revoke consent to share information through GetHelpOC™ for client opt-outs.
- h. Host GetHelpOC™ user meets and gather feedback from Community Network Partners.
- i. Provide technical support to GetHelpOC™ Users.
- j. Serve as intermediary between Community Network Partners and the GetHelpOC™ vendor.
- k. Work with the GetHelpOC™ vendor on funded system fixes, upgrades and feature enhancements.
- l. Facilitate access to system-level data.

- m. Serve as Lead for all GetHelpOC™ required reporting involving GetHelpOC™ data (intake, demographics, assessment, outcomes, data etc.).
- n. Publish system, agency, and program reports from GetHelpOC™ as needed.

#### IV. Help Desk Policies

- a. GetHelpOC™ Help Desk hours are Monday through Friday from 8AM to 5PM, excluding holidays.
- b. Only designated GetHelpOC™ Users may submit requests for technical support to the GetHelpOC™ Help Desk. The methods of contacting the GetHelpOC™ Help Desk are below.

GetHelpOC™ Help Desk phone number 714-589-2358, [MMai@211oc.org](mailto:MMai@211oc.org)

- c. GetHelpOC™ Staff strives to answer all technical support tickets within three (3) business days, but workload, holidays and number of available staff may delay response. GetHelpOC™ Users are responsible for raising technical issues in a timely manner, keeping in mind that their request may not be solved same day.
- d. Client-identifying information should never be sent to the GetHelpOC™ Help Desk. This includes but is not limited to: First Names, Last Names, Dates of Birth, or Social Security Numbers. If you need to discuss a specific client only the client's Unique ID (if applicable) or Referral Number should be sent. Agency Administrators who repeatedly submit client identifying information to the GetHelpOC™ Help Desk may be subject to corrective action.

#### V. Agency Access

- a. In order to be granted GetHelpOC™ access, an organization must be able to meaningfully contribute information related to client intake and/or respond to referrals to close the loop.
- b. An organization that at minimum meets one of the following criteria will be granted access to GetHelpOC™:
  - a. Participate in receiving referrals and logging the outcomes of those referrals.
  - b. Add new consented clients and refer them to 211OC to complete an initial intake and provide resource navigation.
  - c. Provide client navigation of services/resources utilizing the comprehensive resources in GetHelpOC™.
  - d. Approved agencies/entities with read only access.
- c. 211OC strives to raise enough funds to cover GetHelpOC™ user licenses to cover community-based organizations and Federally Qualified Health Centers (FQHC) usage. County and health care user licenses may be at a cost to these entities and will be outlined in the CIE Participation Agreement before signing up for GetHelpOC™.
- d. Organizations that meet the requirements for GetHelpOC™ Access must be in compliance with all other aspects of the GetHelpOC™ Policies and Procedures, including the CIE Participation Agreement and Business Associate Agreement, as applicable.
- e. The GetHelpOC™ Lead reserves the right to remove GetHelpOC™ access if the access is not being used to improve service provision for clients or contributing meaningful data to GetHelpOC™. Examples of unacceptable uses of GetHelpOC™ include but are not limited to:

- a. Using GetHelpOC™ data to monitor the whereabouts or service utilization of participants for purposes outside of case management/care coordination of their needs.
- b. Using GetHelpOC™ data outside of a business need
- c. Using data in GetHelpOC™ as a reason to not serve a client that is not related to eligibility criteria (i.e. substance use history, mental health issues, etc.)
- d. Sharing client identifying data with persons or groups that don't have access GetHelpOC™.

## VI. Participating Agency Requirements

- a. Submit an GetHelpOC™ CIE Participation Agreement
  - a. Participating agencies must submit a CIE Participation Agreement, signed by the agency's designated signor before the agency and/or services can be set up in GetHelpOC™.
- b. Comply with all federal, state and local government laws and regulations regarding non-profit data collection, and with all GetHelpOC™ policies and procedures.
- c. When applicable, participating agencies may be obligated to comply with the Health Insurance Portability and Accountability Act ("HIPAA"), and/or with 42 CFR Part 2, regarding the confidentiality of substance use disorder patient records. Where possible, these agencies should comply with HIPAA, with 42 CFR Part 2, and with the GetHelpOC™ Business Associates Agreement. If it is not possible to reconcile all of the applicable rules, then agencies should comply with the more stringent regulations. Agencies and programs are responsible for ensuring HIPAA and 42 CFR Part 2 compliance.
- d. Abide by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA).
- e. Participate in quarterly review of GetHelpOC™ outcomes and performance metrics meetings with 211OC.
- f. Comply with minimum participation requirements for GetHelpOC™ usage. 211OC will conduct reviews to ensure all agencies are meeting the minimum participation requirements. If any of the following are true at the time of the review, the agency will have one month to rectify the issue.
  - a. Agency does not have at least one active user.
  - b. Agency does not have at least one Referral Manager that is an active GetHelpOC™ user.
  - c. Agency's Referral Manager does not take action on an initial referral in a timely manner. 211OC recommends taking action on the initial referral within 14 business days.
  - d. Agency does not log the outcome of the referral within a reasonable time to connect the client to the needed service. 211OC recommends logging the outcome of the referral within 14 business days.
- g. Organizations found to not meet one or more of the guidelines above may be contacted by the GetHelpOC™ Backbone Agency to discuss the appropriateness of the agency's continued participation in GetHelpOC™, the GetHelpOC™ Backbone Agency may inform the GetHelpOC™ Advisory Council to determine the appropriateness of the agency's continued participation in GetHelpOC™, and the organization may have GetHelpOC™ Access revoked.



## VII. Agreements

All GetHelpOC™ Participating Agencies must have updated versions of the documents below on file with the 211OC in order to gain and retain access to the GetHelpOC™ tool.

- a. **CIE Participation Agreement** – Outlines participation terms, fees, and use of the system, services and administration, the release of liability, indemnification, and insurance requirements. Must be signed by the Agency’s authorized signor and returned back to 211OC to keep on file.
- b. **Business Associate Agreement** – The BAA is attached to all Participation Agreement for administrative efficiency, but is effective only if a Participant is a “Covered Entity” as defined at 45 C.F.R. § 160.103 under the HIPAA privacy and security rules, and is disclosing Protected Health Information to 2-1-1 Orange County. Must be signed with the CIE Participation Agreement by covered entities by the Agency’s authorized signor and returned back to 211OC to keep on file.

## VIII. GetHelpOC™ User Access Roles

- a. Users with access to GetHelpOC™ will be assigned one of the following access roles. Access roles control the level and type of access the user has to functionality within the GetHelpOC™.
  - a. **Referral Manager:** Users with this access have the ability to initially accept/return referrals, assign the referral to another Case Manager/Care Coordinator, add and edit client profiles, create assessments, search and assign new referrals, and log outcomes.
  - b. **Case Manager/Care Coordinator:** Users with this access have the ability to add, edit client profiles, create assessments, search and assign to another Case Manager/Care Coordinator, and log outcomes.
  - c. **Read Only:** Users with this access can view client profiles, enrollments, services, and exits, but cannot add or edit data, and they cannot run canned or ad hoc reports.

## IX. GetHelpOC™ User Requirements

- a. GetHelpOC™ users must complete the following trainings:
  - a. Introduction to GetHelpOC™
  - b. How to go view the training modules
  - c. Community Information Exchange (CIE) benefits
  - d. Course Content
  - e. Lifecycle of a referral
  - f. Summary
  - g. Referral Manager
  - h. Referral Manager steps
  - i. Referral Status management
  - j. Care Coordinator/Case Manager
  - k. Logging an outcome
  - l. Community Partner Network Dashboard
  - m. Resource Search
  - n. Client Revocation of Consent process

- o. GetHelpOC Policies and Procedures
    - p. Support
  - b. All GetHelpOC™ Users must provide the following information in order to receive a GetHelpOC™ account:
    - a. The GetHelpOC™ User's first name, last name, and position title.
    - b. The GetHelpOC™ User's *work* email. Personal emails will not be allowed. Shared email accounts are also not allowed.
    - c. Service/Program the user should be a Referral Manager and/or Case Manager for.
  - c. All GetHelpOC™ Users must be able to clearly explain the purpose and benefit of GetHelpOC™ and the related GetHelpOC™ Consent Form to OC resident populations as detailed in the Client Privacy section. This includes providing an overview of:
    - a. What is GetHelpOC™?
    - b. What personal identifying data will be collected and how it will be used
    - c. Privacy and confidentiality standards
    - d. Revocation of consent and how to do it

## X. Referral Manager Requirements

- a. Referral Managers must complete the Referral Manager training before they can be certified as Referral Manager. This training covers the responsibilities of the Referral Manager, as well as training on GetHelpOC™ functionality specific to Referral Managers.
- b. Referral Managers are responsible to responding to the initial referrals in a timely manner.
  - a. When a referral is sent the Referral Manager receives a system generated email notification sent to the user's agency email instructing to log into the GetHelpOC™ and take action.
  - b. Best practices are responding to an initial referral immediately or within 2 business days, but no later than 14 business days after the initial referral was sent.
- c. If a referral is accepted, Referral Managers are responsible for assigning the referral to a Case Manager/Care Coordinator user for that service immediately after acceptance.
- d. Referral Managers must notify the GetHelpOC™ Lead Agency of all personnel changes.
  - a. When a GetHelpOC™ User no longer needs access to GetHelpOC™ whether due to changing job responsibilities or departure from the agency, Referral Managers must update the GetHelpOC™ team immediately but no less than 2 business days by notifying the GetHelpOC™ Help Desk at 714-589-2358 or email Michelle Mai at [mmai@211oc.org](mailto:mmai@211oc.org).
- e. Referral Managers are responsible for ensuring that agency equipment meets the specifications outlined in the Technical Standards section of this document.
- f. Referral Managers must ensure all services related to their Agency in the GetHelpOC™ database are set up correctly, and notify the GetHelpOC™ Lead when a program is no longer serving clients.
  - a. Agencies should notify the GetHelpOC™ Help Desk when they would like to add any of their programs to start participation in GetHelpOC™.
  - b. Referral Managers are required to notify 211OC when programs are no longer active. The GetHelpOC™ Lead Agency will deactivate the program in GetHelpOC™ so no new referrals can assigned to the program.

## XI. Technical Standards

GetHelpOC™ Participating Agencies must adhere to the following technical standards with regards to all technical equipment used to access GetHelpOC™. The GetHelpOC™ Lead Agency is not responsible for providing proper technical equipment or for providing IT services unrelated to GetHelpOC™.

- a. The most recent version of the following web browsers are supported for accessing GetHelpOC™:
  - a. Google Chrome
  - b. Microsoft Edge
  - c. Mozilla Firefox
  - d. Apple Safari
- b. An internet connection is required to access GetHelpOC™, and is the sole responsibility of the participating agency.
- c. All screens must lock within 15 minutes of inactivity and point to the computer terminal or mobile device login page upon subsequent activity. Users should manually lock their screen when they leave their device unattended.
  - a. Windows: Press the Windows + L keys on the keyboard
  - b. Mobile device: Briefly press the Power button
  - c. Mac: Press Control + Command + Q keys on the keyboard
- d. Computers, Tablets, or Other Mobile Devices that Access GetHelpOC™ OR share a network with computers or mobile devices that access GetHelpOC™ (iPads and other devices that run on iOS are exempt from these requirements)
  - a. Must have virus protection software that has been updated in the past week and performs scans daily and automatically updates to the most current version.
  - b. Must have a firewall in place between any computer and internet connection for the entire network, be protected with at minimum Wired Equivalent Privacy (WEP), use Network Address Translation (NAT), and maintain the most recent virus security updates.
- e. All computer terminals and mobile devices used to access GetHelpOC™ (including organization network equipment) must be stored in a secure location (i.e., a locked office area that is not accessible to the public).
- f. The Executive Director or other empowered officer within the GetHelpOC™ participating agency will be responsible for the maintenance and disposal of onsite computer and mobile device equipment. This includes:
  - a. Purchase of and upgrades to all existing and new computer and mobile device equipment for utilization in the system.
  - b. Provision of computer terminals or mobile device to all GetHelpOC™ Users for accessing GetHelpOC™ that have a unique username/password to log onto the operating system.

## XII. Privacy

- a. GetHelpOC™ Account Passwords
  - a. The GetHelpOC™ vendor will enforce a password change for all GetHelpOC™ accounts every 90 days.

- b. GetHelpOC™ Users will never share passwords or GetHelpOC™ accounts for any reason. The sharing of GetHelpOC™ accounts and/or passwords directly endangers the privacy of clients who entrust their personal identifying information to GetHelpOC™. GetHelpOC™ users found to be sharing GetHelpOC™ accounts and/or passwords will be subject to corrective action.
  - c. After 15 minutes of inactivity in the GetHelpOC™, the system will automatically lock the user out and the user will need to enter their password again to gain access to GetHelpOC™.
  - d. If a GetHelpOC™ User attempts to log in ten (10) times with an incorrect password, the GetHelpOC™ will automatically lock their account. The GetHelpOC™ user will be unable to access GetHelpOC™ unless the GetHelpOC™ User or Referral Manager contacts the GetHelpOC™ Help Desk to unlock the account.
- b. Access to GetHelpOC™
    - a. As discussed in the Referral Manager Requirements section, agency staff who no longer need access to GetHelpOC™ will have their GetHelpOC™ account access revoked. In the event that GetHelpOC™ account access is not revoked for any reason, the former GetHelpOC™ User is required to act with integrity and not attempt to access GetHelpOC™ if their job duties no longer include GetHelpOC™ or if they leave their GetHelpOC™ participating agency.
    - b. The GetHelpOC™ Lead Agency reserves the right to lock the account of a GetHelpOC™ User who has not completed required trainings. The GetHelpOC™ Lead Agency will unlock the account once the required trainings have been completed.
  - c. GetHelpOC™ Data
    - a. Participating Agencies
      - i. All GetHelpOC™ Users are required to ensure that client/patient identifying information is never sent across an unencrypted network, saved in an unprotected folder on a computer, or, in the case of hard copies of client identifying information, stored anywhere other than a locked file cabinet or office.
      - ii. Client Identifying Information CANNOT be sent over unencrypted email either between a participating agency and 211OC or between staff at a participating agency. The only permissible way to discuss an individual client over unencrypted email is using the client's unique ID number.
      - iii. Agencies must have a formal policy for intra-agency communication regarding clients that protects client privacy.
    - b. GetHelpOC™ Vendor
      - i. The vendor will perform daily and weekly backups to prevent loss of data.
      - ii. Backups will be stored both onsite and offsite. All standard security and privacy precautions apply to offsite storage. The offsite storage facility is equipped with surge protectors and natural disaster protective measures.
  - d. Client Privacy
    - a. In order for client records to be shared in GetHelpOC™, clients must consent to share their data with other agencies participating in GetHelpOC™.
      - i. Clients can both verbally consent to share their data or sign a written consent form to share their data in GetHelpOC™. Written consent forms must be uploaded to

- the document section of GetHelpOC™ and logged on the consent screen in GetHelpOC™.
- ii. Agency staff must explain the consent to clients and how their information is used and viewed.
  - iii. Only when an active consent is obtained can a direct referral be sent to Community Partner Agencies.
- b. Protected Personal Information (PPI) is defined in this manual and the Consent to Share Personal Protected Information form as:
- i. [Clients'] name and [Clients'] contact information
  - ii. [Clients'] social security number and date of birth
  - iii. [Clients'] basic demographic information such as gender and race/ethnicity
  - iv. [Clients'] history of homelessness and housing (including [Clients'] current housing status, and where and when [Clients] have accessed services)
  - v. [Clients'] self-reported medical history and disability status, including mental and physical health concerns, substance abuse history, and HIV/AIDS status
  - vi. [Clients'] case notes and services
  - vii. [Clients'] income sources and amounts; and non-cash benefits
  - viii. [Clients'] veteran status
  - ix. Information about other members of [Clients'] household
  - x. [Clients'] self-reported history of domestic violence
  - xi. [Clients'] photo (optional)
- c. If clients refuse to Consent, they cannot be pressured into providing consent or denied services on the basis of their refusal to consent. When clients refuse to consent to share their information, a client record can still be created, data can be logged, resources can be searched, and referral information can be text, emailed or verbally given to the client to reach out to the program. Refusal to sign the consent form means that all of that client's data is only visible by the agency serving the client, and GetHelpOC™ System Administrators.
- d. Upon giving verbal or written **Consent** clients must be made aware of their right to revoke their consent to share protected information at any time.
- e. If a client would like to revoke consent, they can either obtain the **GetHelpOC™ Client Revocation of Consent Form** on the GetHelpOC™ website [www.gethelpoc.org](http://www.gethelpoc.org) and email [revoke@211oc.org](mailto:revoke@211oc.org) or the agency/staff working with the client may also upload the form into the client's profile and reach out to [revoke@211oc.org](mailto:revoke@211oc.org) to request support with anonymizing the client's profile. If the client revokes authorization at a later date, it will not affect information that has already been shared.
- f. Participating agencies can obtain copies of the **GetHelpOC™ Client Grievance form** on the website [www.GetHelpOC.org](http://www.GetHelpOC.org).
- i. In the event that the participating agency's in-house grievance policy was not able to resolve the grievance, clients will submit the grievance form directly to 211OC.
- e. Client Record Requests
- a. Clients may inspect and obtain a copy of their data as entered in GetHelpOC™.
    - i. This includes the data on the client's Profile screen, the client's Consent/Authorization to Share Data, the client's history in any programs that

participate in GetHelpOC™, and a list of all client documents uploaded into GetHelpOC™.

- b. Clients may submit the request to 211OC by contacting the GetHelpOC™ Help Desk.
  - i. A GetHelpOC™ user at the agency is responsible for submitting this request to the GetHelpOC™ Help Desk for the client within five (5) business days of the request except where exempted by state and federal law.
  - ii. The GetHelpOC™ Help Desk will respond to the request as outlined in the GetHelpOC™ Help Desk Policies section.
  - iii. A GetHelpOC™ user at the agency is required to review the dashboard with the client upon request.
- c. No client shall have access to another client's data for any reason, except for parents or guardians of a minor requesting their minor child's records.

### XIII. Data Use and Disclosure

- a. Client data may be used or disclosed for system administration, technical support, program compliance, analytical use, and other purposes as required by law. Uses involve sharing parts of client information with persons within an organization. Disclosures involve sharing parts of client information with persons or organizations outside an organization.
- b. Participating Agencies may use data contained in the system to support the delivery of services to clients in Orange County. Organizations may use or disclose client information internally for administrative functions, technical support, and management purposes. Participating Organizations may also use client information for internal analysis, such as analyzing client outcomes to evaluate programs.
- c. The vendor and any authorized subcontractor shall not use or disclose data stored in the GetHelpOC™ without expressed written permission in order to enforce information security protocols. If granted permission, the data will only be used in the context of interpreting data for research and system troubleshooting purposes.

### XIV. Data Release

- a. Data release refers to the dissemination of aggregate or anonymous client-level data for the purposes of system administration, technical support, program compliance, and analytical use.
- b. No identifiable client data, including but not limited to name, Social Security Number, or Date of Birth, will be released by the GetHelpOC™ Lead Agency or any Participating Organizations to any person, agency, or organization not participating in GetHelpOC™ for any purpose without written permission from the client, with the exception of subpoenas, academic research purposes or other circumstances as required by law.
- c. Each Participating Agency owns their own data that is stored in the system. The agency may not release personal identifiable client data without written permission from the client. Agencies may release aggregate data for all clients to whom the agency provided services. Aggregate data is data that has been collected from different clients and compiled into sums. Agencies may share this data for their agency as a whole, or for each of their projects.

## XV. Data Breach

- a. A data breach is the unauthorized access or acquisition of data that compromises the security, confidentiality, or integrity of data in GetHelpOC™. Data may be in any format (electronic, hardcopy or verbal) and may consist of a single piece of data and/or an entire data system.
- b. Breaches to the GetHelpOC™ servers are managed by the GetHelpOC™ vendor. If a breach to the GetHelpOC™ servers occurs, the GetHelpOC™ vendor will notify the GetHelpOC™ Lead Agency, and the GetHelpOC™ Lead will notify the participating agencies as appropriate.
- c. Breaches may also occur at participating agencies. The participating agency is responsible for immediately mitigating the data breach to the extent possible as soon as the breach is identified, including notifying clients who may have been impacted by this breach. Data breaches could include but are not limited to:
  - a. GetHelpOC™ users sharing GetHelpOC™ account and/or passwords with others.
  - b. Sharing client identifying information with anyone that doesn't have access to GetHelpOC™ or hasn't been approved to access that data.
  - c. Sharing client identifying information over an unencrypted network.
  - d. Leaving printed documents with client identifying information in an unsecured location.
- d. Any suspected data breach must be reported to the GetHelpOC™ Lead Agency by submitting the Data Breach Incident Report immediately and emailed to [databreach@211oc.org](mailto:databreach@211oc.org). The GetHelpOC™ Lead will review the breach and the mitigating actions taken by the agency and will assist with any additional action that may be needed.
- e. The GetHelpOC™ Lead will report all data breaches to the Community Partner Network, and that group will determine if any corrective action is needed. Corrective action may include but is not limited to notifying the GetHelpOC™ Advisory Board, funders of the agency, and revoking GetHelpOC™ access.