



**INDIANA HOUSING AND COMMUNITY DEVELOPMENT AUTHORITY/
BALANCE OF STATE CONTINUUM OF CARE BOARD POLICY FOR LAW ENFORCEMENT AGENCY HOMELESS
MANAGEMENT INFORMATION SYSTEM REQUESTS**

- I. **Purpose**

This policy sets forth the terms and conditions under which the Indiana Balance of State Continuum of Care Board of Directors, in conjunction with the Indiana Housing and Community Development Authority (IHCDA), will allow police departments, community supervision agencies, such as probation/parole/community corrections, or any other law enforcement agencies requesting access to the Indiana Balance of State’s Homeless Management Information System or Domestic Violence ClientTrack production systems

- II. **Scope**

This policy is applicable to any law enforcement or community supervision agency requesting access to the IHCDA’s Homelessness Information System (“HMIS”), or Domestic Violence production systems, as well as the staff, volunteers, and contractors of these agencies

- III. **Policy**
 - a. The BoS CoC Board does not allow access of the Indiana Balance of State HMIS or DV ClientTrack production systems for any law enforcement agency, for any reason, purpose, or functionality.
 - b. This policy is retroactive to 10/1/2019

- IV. **Exceptions**
 - a. Disclosures for Law Enforcement Purposes: PPI may be disclosed, at the sole discretion of the BoS CoC Board, consistent with applicable law and standards of ethical conduct, for a law enforcement purpose to a law enforcement official under any of the following circumstances:
 - 1. In response to a lawful court order, court-ordered warrant, subpoena, or summons issued by a judicial officer, or a grand jury subpoena.
 - 2. If the law enforcement official makes a written request for protected personal information that: (1) is signed by a supervisory official of the law enforcement agency seeking the PPI; (2) states that the information is relevant and material to a legitimate law enforcement investigation; (3) identifies the PPI sought; (4) is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and (5) states that de-identified information could not be used to accomplish the purpose of the disclosure.
 - 3. If IHCDA believes in good faith that the PPI constitutes evidence of criminal conduct that occurred on the premises of IHCDA or an HMIS agency; or
 - 4. In response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics; or

5. If (1) the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others); and (2) the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.

V. Grievance

- a. Complaints may be filed in writing to the HMIS Manager at IHEDA at 30 S. Meridian St. Suite 900 Indianapolis, IN 46204