



Notice of Privacy Practices

THIS NOTICE DESCRIBES HOW MEDICAL (OR PERSONAL) INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Introduction

HOM, Inc. ("HOM") is a company providing housing services. While HOM is not a HIPAA covered entity, it operates as a Business Associate to the covered entities and government programs, including behavioral health, Medicaid funded, and homeless services systems of care. HOM may receive, access, use, transmit, or maintain limited protected health information (PHI) and personally identifiable information (PII) to assist with the identification, procurement, coordination, and management of housing targeted for special needs families and individuals.

We believe that this hybrid relationship merits our disclosure of how we manage these records and the information in the records although HOM does not serve as the originating custodian of medical records but may temporarily store or transmit information on behalf of covered entities in accordance with the contractual and legal requirements. Moreover, HOM executes all contracts and agreements, in accordance with HIPAA and HUD, necessary to assign the responsibility for, and care of, health and other private information. These are called "Business Associate Contracts" or "Business Associate Agreements."

Accordingly, while we do not believe HOM is required to have a "Notice of Privacy Practices," we think it a good practice and a responsibility we take seriously: maintaining your privacy in partnership with your health care and housing providers.

Uses and Disclosures and Your Authorization

Health care operations. Your health information may be used as necessary to support the day-to-day activities and management of HOM as a Business Associate. For example, information on the services you receive may be used to support budgeting, financial reporting, quality improvement activities, and coordination of housing operations.

Housing Operations. In accordance with the extensive privacy rules and regulations connected with local, state, and federal government entities, HOM conforms to its policies and procedures to protect your privacy when helping the Continuum of Care (homeless assistance) providers, both homeless services and supportive services, assist you with housing and supportive services.

Law enforcement. Your health information may be disclosed to law enforcement agencies as required by law, including for government audits and inspections, to facilitate law enforcement investigations, and to comply with mandatory reporting obligations.

Public health reporting. Your health information may be disclosed to public health agencies as required by law, such as reporting certain communicable diseases to state or federal public health authorities.

We ask that you help us and provide us with your consent and authorization where required. If you change your mind after authorizing a use or disclosure of your information, you may submit a written revocation of the authorization. However, your decision to revoke the authorization will not affect or undo any use or disclosure of information that occurred before you notified us of your decision to revoke your authorization.

We often talk to landlords about our housing programs. We never discuss details of a client's health matters with landlords, but landlords know the nature of our housing programs and how HOM receives referrals and from what agencies.

Safeguards to protect your information. HOM maintains administrative, physical, and technical safeguards designed to protect the confidentiality, integrity, and availability of protected health information. These safeguards include workforce training, role-based access controls, secure electronic systems, confidentiality agreements, and policies governing the transmission, storage, and disposal of information. HOM does not use personal health information for fundraising or marketing.

Individual Rights

You have certain rights under the federal privacy standards. These include:

- The right to request restrictions on the use and disclosure of your protected health information. We are not required to agree to a requested restriction unless the disclosure is restricted by law or regulation.
- The right to receive confidential communications concerning your services.
- The right to inspect and copy your protected health information (if we have it available in some format allowing for reproduction).
- The right to amend or submit corrections to your protected health information if we have the ability to complete this request.
- The right to receive an accounting of how and to whom your protected health information has been disclosed.
- The right to receive a printed copy of this notice upon request.

Certain rights may be exercised through the covered entity or service provider that maintains your official health or housing record. HOM will assist in directing requests as appropriate.

You also have rights granted to you by the federal agency Housing and Urban Development (HUD). The data management system called Homeless Management Information System (HMIS) includes these rights, and the homeless services or supportive housing services provider should explain these to you.

HOM Duties

We are required by law and by contract to maintain the privacy and security of your protected health information as a Business Associate of covered entities.). While HOM is not required to provide you with this notice of privacy practices as a covered entity, we are required to comply with HIPAA and HUD privacy and security requirements and to follow the practices described in this notice. In the event of a breach of unsecured protected health information, HOM will notify the applicable covered entity in accordance with the Business Associate Agreement requirements and will cooperate fully in investigation, mitigation, and notification efforts as required by law..

Right to Revise Privacy Practices

As permitted by law, we reserve the right to amend or modify our privacy policies and practices. These changes in our policies and practices may be required by changes in federal and state laws and regulations. Upon request, we will provide you with the most recently revised notice on any office visit.

The revised policies and practices will be applied to all protected health information we maintain.

Requests to Inspect Protected Health Information

You may generally inspect or copy the protected health information that we maintain. As permitted by federal regulation, we require that requests to inspect or copy protected health information be submitted in writing. You may obtain a form to request access to your records by contacting your Housing Specialist or Chief Housing Officer. Your request will be reviewed and will generally be approved unless there are legal or medical reasons to deny the request.

Complaints & Contact

If you believe your privacy rights have been violated, you may file a complaint without fear of retaliation.

You may direct any questions regarding this notice, or submit a complaint directly to:

HOM, Inc.
Hayley Winterberg, Chief Housing Officer
5326 E Washington St., Suite 5
Phoenix, AZ 85034-2130
602-265-4640
Email: hayley@hominc.com
Website: www.hominc.com

You may also file a complaint with the federal government at:
Office for Civil Rights (OCR)
U.S. Department of Health and Human Services
200 Independence Avenue, SW Room 509F, HHH Building
Washington, DC 20201
Toll-Free: 1-800-368-1019
TTY/TDD: 1-800-537-7697
Email: OCRPrivacy@hhs.gov
Website: <https://www.hhs.gov/ocr>

You will not be penalized or otherwise retaliated against for filing a complaint

This notice is effective on or after February 1, 2026.