

Privacy Policy

The **Yellowstone Country Assistance Network of Park County, Wyoming**, a Wyoming Non-Profit Corporation, is committed to providing quality services to you, and this policy outlines our ongoing obligations to you regarding how we manage your Personal Information.

What is Personal Information, and why do we collect it?

Personal information identifies an individual with unique descriptors, identification numbers, ethnicity, health, financial, employment, credit, criminal, life, education.

This Personal Information can be obtained in many ways, including our HIPPA compliant online application, personal interviews, correspondence, telephone, email, text via our website www.ycanhelp.org, from your case manager, other publicly available sources, and third parties.

As part of regular operation, we collect your Personal Information for the primary purpose of providing our services to you, providing online resources and information to our clients, evaluating programs and services, and marketing. We don't guarantee website links or the policy of third parties. We may also use your Personal Information for secondary purposes closely related to the primary goal in circumstances where you reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information, we will, where appropriate and possible, explain why we are collecting the information and how we plan to use it.

Sensitive Personal Information

Sensitive Personal Information includes but is not limited to the information, including Social Security numbers, driver's license numbers, Alien Registration numbers, financial or medical records, biometrics, or criminal history.

Sensitive information will be used by us only:

- For the primary purpose for which Yellowstone Country Assistance Network of Park County, Wyoming obtained it.
- Some of our funding sources require personal data to qualify you for our programs and services provided by that funding source. For example, some services are provided with federal funding and need more information. We ask our application intake questions because of those contractual requirements.
 - Non-Discrimination Policy: Title IV of the Federal Civil Rights Act of 1964 [42 U.S.C. 2000d], Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12132), and all regulations related to these Acts address non-discrimination in service delivery to clients. All local offices must ensure that no one, based on race, color, sex, national origin, or handicap, is excluded from participation in, denied the benefits of, or subjected to discrimination under any service or activity the federal government provides funding.
 - Part of our verification process is to verify the identity and number of household members in your household. You may choose to do this with other documentation. For example, instead of using the last four digits of the Social Security Number, enter 0000 on the application.

- Proof of U.S. Residency/Legal Status: Neither the CSBG Act nor the Wyoming Community Services Program and its program guidance, policies, and procedures require proof of residency/legal status as an eligibility requirement to receive services “non-citizens, regardless of their alien status, should not be banned from CSBG programs based solely on their alien status unless the exclusion is authorized by another statute.”
- For a secondary purpose that is directly related to the primary purpose
- With your consent, or where required or authorized by law.

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances, we may be provided with information by third parties. In such a case, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Eligibility Determinations

To determine eligibility for Community Services Block Grant funds, we use an application process to collect all the demographic information needed to complete the Community Services Block Grant Annual Report, Proof of identity/residency, household income Documentation, and creditor documentation for services requested.

- **Application for Services and Eligibility Determination:** As a requirement of our contract with the Wyoming Department of Health, Individual and family applications must include all the demographic information needed to complete the Community Services Block Grant Annual Report. The application/eligibility determination must document all necessary information to establish eligibility. The required Individual/Family-level demographics are:

Individual Characteristics

1. Gender
2. Age
3. Education Level
4. Disconnected Youth
5. Health
6. Ethnicity/Race
7. Military Status
8. Work Status

Family Characteristics

1. Household Type
2. Household Size
3. Housing
4. Level of Household Income
5. Sources of Household Income
6. Other Income Source
7. Non-Cash Benefits

- We may also collect nonpublic personal information about you from various sources to verify the information you provided in your application, including but not limited to:
 - Identification of household members.
 - The Yellowstone Country Assistance Network policy that only participants who reside in the counties we are contracted to serve are eligible to receive services. We, therefore, verify residency information.
 - Interviews with you and/or your case manager regarding your personal information.
 - Referrals from Community Partners, Case Managers, Social Workers, Park County Court Supervised Treatment Program, Heritage Health Clinic, The Help Center, other Social Service Agencies, Private Practices, Veterans Administration, and Religious Organizations.
 - Past and Present Employers and/or Educational Institutions.

- Welfare Agencies, Public Health Spousal Support and Alimony Providers, Child Support Authorities, Social Security Administration, State Unemployment Agencies, State Workforce Services, banks, and other financial institutions.
- As requested in your application, past and present landlords/mortgage companies, healthcare clinics, pharmacies, dental clinics, hospitals, repair shops, childcare providers, and other vendors.
- Yellowstone Country Assistance Network of Park County, Wyoming keeps an income eligibility determination record for each applicant for CSBG services/benefits, which includes:
 - Documentation establishing that a staff member has sought to verify the accuracy of the income information on eligibility you provided by:
 - Reviewing the income documents submitted by you and/or conducting an in-person interview with you and/or your case manager; and
 - Seeking information from third parties who have first-hand knowledge about your household's eligibility in cases in which no documentation regarding the income eligibility of your family has been received by, or when it is either more efficient or reliable to do so rather than to search for eligibility documentation. The record should include the names, titles, and affiliations of the third parties, and the applicant's signed consent form permitting the program to contact each third party; and
 - A signed and dated statement by the staff person who made the eligibility determination certifies that the information on eligibility in the file is accurate to the best of the person's knowledge. Based on that information, the person has determined the applicant to be eligible for services.
- Zero Income Disclaimer: Self-Declaration for Zero Income is allowable only after all avenues of documenting income eligibility have been exhausted. Your Self Declaration of Zero Income must contain a statement you sign indicating that you or one of your household members has no other proof of income in the file in place of the income eligibility. In addition, your Self Declaration of Zero Income must contain evidence of the attempts at proving eligibility in the client file.
 - A household unit of zero income must provide confirmation. Clients with no income at the time of application must sign and date a self-declaration form attesting to that fact. The caseworker must also sign and date that form. For ongoing CSBG clients, this form must be dated within one month from the date of application and monthly after that if there is no change in the client's income. In addition, the application must indicate the zero-income status of each household member 18 years of age or older.
 - Yellowstone Country Assistance Network Maintains the form attesting to the fact signed by the applicant and the staff member who attempted to verify the applicant's household income.

Disclosure of Personal Information

Yellowstone Country Assistance Network of Park County, Wyoming, may disclose your Personal Information in several circumstances, including the following:

- Proof of income documentation must be in the file of each person served through CSBG funding. Yellowstone Country Assistance Network and our contractor(s) must also upload this documentation and client demographic information into the state-supported CSBG database to allow desk monitoring by the county grantee and the State's Community Services Program Manager.
- Third parties where you consent in writing to the use or disclosure; and
- Where required or authorized by law.

Electronic Transmittal of Information

We will, at your request, transmit information to you by facsimile, email, text, or over the internet. If any confidentiality breaches occur because of data transmission over the internet according to your request, you agree that this will not constitute a breach of any obligation of confidentiality. If you wish to limit such transmission to information that is not highly confidential or seek more secure means of communication for highly personal information, you will need to inform us. We recommend using our HIPPA compliant Documents Upload or our VPN email.

- HIPPA Complaint Document Uploads: <https://hipaa.jotform.com/201894285178062>
- VPN Email: ycahelp@protonmail.com

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and unauthorized access, modification, or disclosure. When your Personal Information is no longer needed for the Yellowstone Country Assistance Network of Park County, Wyoming obtained it. We will take reasonable steps to destroy or permanently de-identify your Personal Information.

- Yellowstone Country Assistance Network of Park County, Wyoming, and our contractor(s) will maintain programming and client records for a minimum of three (3) years after the Wyoming Department of Health has submitted the final Federal Funding Report (F.F.R.) to the Federal Office of Community Services. Client records are kept in a secure location accessible only to pertinent staff. CAP-60 will maintain computer files under a secured system overseen by the Wyoming Department of Health Community Services Program. Records must be kept longer if there is an ongoing on-site audit or programmatic finding that has not been resolved pertaining to the federal fiscal years being audited.
- Yellowstone Country Assistance Network of Park County, Wyoming, and our contractor(s) use secure password access and upload documentation and client demographic information that Yellowstone Country Assistance Network or our contractor(s) must also upload into the state-supported CSBG database. However, Yellowstone Country Assistance Network of Park County, Wyoming, and our contractor(s) do not have control over the security of the database and/or outside users of the system. We believe the system to be secure but can make no guarantees or representations regarding the system. We take no responsibility for the security of any information accessed by outside sources.

Access to your Personal Information

You may access the Personal Information we hold about you and update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please get in touch with us in writing.

Yellowstone Country Assistance Network of Park County, Wyoming, will not charge any fee for your access request but may charge an administrative fee of up to \$25.00 for providing a copy or mailing you a copy of your Personal Information. In addition, to protect your Personal Information, we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is up to date. We will take reasonable steps to ensure that your Personal Information is accurate, complete, and up to date. However, if you find that the information we have is not up to date or inaccurate, please advise us as soon as practicable to update our records and ensure we can continue to provide quality services to you. For clients served for a year or more, a new application is required 12 months after the origination of services.

Policy Updates

The Yellowstone Country Assistance Network of Park County, Wyoming, reserves the right at any time, for any reason, to amend this Privacy Policy. This policy is available on our website www.ycanhelp.org.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy, don't hesitate to contact us in writing.

Yellowstone Country Assistance Network

P.O. Box 600 Basin, Wyoming 82410

Complaint Form: <https://hipaa.jotform.com/201765545598165>

Email: office@ycanhelp.org