Message

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Sent: 9/16/2016 3:43:53 PM
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Subject: PII and Tracking W. Calumet Residents as they move

Importance: High

Jim:
The issue of tracking residents as they move out of the West Calumet Housing complex (in order to ensure that services follow residents) has been the subject of much discussion since the August 3 announcement regarding vouchers. We have discussed a need for a specific procedure to be put in place which allows HUD & ECHA's tracking data to be shared with other agencies. But as I write this email, residents are moving, and no formal or informal procedure is in place.

Personally Identifiable Information seems to be the sticking point. I understand that the Indiana State Department of Health's attorneys are reviewing a Data Sharing Agreement. I don't know the status of an agreement between HUD and EPA nor HUD and the School City of East Chicago. The East Chicago Department of Health, and the City have not been provided with such an agreement from HUD yet. Also note that having an agreement in place would be just one part of the procedure necessary to ensure that data is shared in a timely and effective manner across agencies, and privacy maintained.

Can HUD, and your attorneys develop a procedure for sharing information between agencies which will provide for:

- Sharing HUD's tracking data on W. Calumet Residents as they relocate across agencies (HUD/ECHA; EPA; ISDH; EC Department of Health; School City of East Chicago; USDA/Purdue Extension Service/WIC)
- Key Data: Resident's new addresses, BLL Status, health providers, school information and whether Case Management is mandated
- Health/Case Management related information
    - Hand off to Health Department with jurisdiction at resident's destination
    - Blood lead levels over time
    - Additional needs identified by Case Managers, specifically with regard to how those needs impact the various agencies
    - Continuation of WIC & other services
- Inspections/Risk assessment at residents' destination housing
    - Any lead based paint or other risk assessment provided at new residences
    - (Since HUD cannot pay for a risk Assessment, ISDH and the City are discussion other possible options)
- Education related info (where needed)
    - Individual Education Plans and resident's destination schools

I'm sure there is other relevant data which should be considered. It seems that it would be best if HUD maintains "ownership"/control over the data, and other agencies who have executed Data Sharing Agreements are provided access to data as needed.

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