

TOWN OF PINEVILLE GRIEVANCE POLICY

DATE: September 29, 2025

SUBJECT: Grievances, Potential Breaches and other identified Privacy problems:

APPROVAL LEVEL: Pineville Town Council

REASONS FOR POLICY:

1. To protect the privacy of client information housed on Meck HMIS
2. To comply with applicable laws and regulations
3. To insure timely and appropriate response to identified privacy problems:

Grievance Policy

Town of Pineville

- 1) Grievances must be submitted to [Agency] in writing. Response to submitted grievances will depend on the type of grievance submitted.
 - a) Town of Pineville must respond in writing to any grievances related to the Meck HMIS or Town of Pineville general operation within 30 working days.
 - b) Town of Pineville must respond in writing to any grievances related to privacy (client or agency/user) within 7 working days.
 - c) If the complaint relates to a client's protected information within the shared database, Town of Pineville staff receiving the complaint will take immediate action to remove the potential for future or further breaches by closing the security on the record(s) involved.
- 2) Grievances must be submitted in writing to the Town of Pineville Executive Director.
- 3) A plan of action will be developed to respond to each grievance within 5 working days.
- 4) If the consumer continues to be dissatisfied, he/she may appeal to the Pineville Town Council.
- 5) All decisions made by the Pineville Town Council are final.
- 6) Town of Pineville will provide the Continuum of Care with a copy of any Grievance related to Meck HMIS and Town of Pineville's response to that Grievance via the HMIS Help Desk: hmis@mecknc.gov .

Notification and Response To All Potential Privacy Breaches.

- 1) Town of Pineville is required to report all potential breaches of confidentiality to the HMIS System Administrator.
 - a) If an agency believes that they may have had a potential breach, they are required to immediately close all impacted records by:
 - i) Closing the Profile, or
 - ii) Locking all completed assessments if the Profile cannot be closed due to the fact that it is currently shared between agencies.
 - b) Upon notification of a potential breach or significant failure to comply with procedures, Town of Pineville will take immediate action to protect the client's

- privacy. These activities may include:
- i) Changing the client's security setting to closed (if not already completed).
 - ii) Inactivating the client record.
 - iii) Removing the client from the database.
 - iv) Running audit reports to determine if unauthorized users have viewed the record(s) in question.
 - v) Suspending User Privileges and inactivating their license(s).
 - vi) Inactivating the Agency as a whole.
- 2) If a breach has occurred that resulted from an action by any Town of Pineville staff, contractor, or System Administrator:
- a) The Agency(s) whose data was impacted will be notified within 24 working hours once a breach has been substantiated.
 - b) Upon identification of a potential breach or significant failure to comply with procedures, Town of Pineville will take immediate action to protect the client's privacy. These activities may include:
 - i) Changing the client's security setting to closed (if not already completed).
 - ii) Inactivating the client record.
 - iii) Removing the client from the database.
 - iv) Running audit reports to determine if unauthorized users have viewed the record(s) in question.
 - v) Suspending Administrative Privileges.
- 3) The Agency's Privacy Officer will report any confirmed breaches to Meck HMIS with a corrective action plan.
- 4) The Privacy Officer or his/her designee will alert all users of any potential privacy/security risks and provide training that will reduce the likelihood of further privacy problems.