

United Way of Greater St. Louis Direct Assistance Portal
Agency Partner Data Sharing; Client Confidentiality; and Release of Client
Information Agreement

Effective May 29, 2017

The United Way of Greater St. Louis (hereinafter "UWGSL"), provides a direct assistance portal (DAP) maintained at the secure website, www.logassistance.org. The DAP houses and maintains assistance related products within the platform/portal. Current platform assistance products and their general functions are described below:

- 1) **DollarMore Energy Assistance Program** – The DAP is used to manage and administer funds allocated within the portal by Ameren Missouri and UWGSL to agencies participating in Ameren Missouri's DollarMore program. Participating agencies located in Ameren Missouri's service area assign direct assistance funding from their allocations to cover qualifying energy related expenses for qualifying Ameren Missouri customers.. Approved assistance requests are processed in the DAP and paid by UWGSL to approved energy vendors on agencies' and customers' behalves.

- 2) **DollarHelp Heating Assistance Program** – The DAP is used to manage and administer funds allocated within the portal by Spire Energy and UWGSL to agencies participating in Spire's DollarHelp program. Participating agencies located within Spire's and their subsidiaries' service areas direct assistance funding from their allocations to cover qualifying heating related expenses for qualifying customers of Spire and its subsidiaries. Approved assistance requests are processed in the DAP and paid by UWGSL to approved energy vendors on the agency's and customer's behalves.

- 3) **Ameren Missouri Keeping Current Program** – Funds within this program are allocated within the DAP by Ameren Missouri and UWGSL to agencies participating in Ameren Missouri's Keeping Current program. Participating agencies enroll eligible Ameren Missouri customers in this bill rebate program that awards clients for on-time payment of Ameren Missouri bills. The DAP tracks clients' continued eligibility in the program and informs agencies regarding their clients' enrollment status.

- 4) **Emergency Food and Shelter Program (EFS)** – UWGSL is the fiscal agent of FEMA sponsored EFS federal funds for select counties and serves as the administrator for their affiliated local Boards within UWGSL's 16 county service area. Approved agencies are granted funding for eligible clients within designated funding categories. The recurring program operates on specific funding cycles and requires the use of a clearing house shared by approved agencies to ensure that clients served have not been served already by another agency, or within their own, for a particular funding type and funding phase. The clearinghouse function is housed in the DAP to support input of EFS clients served and to certify that available assistance has been provided so no other agency can fund it for that client according to program rules. **EFS agencies** are responsible to keep certifications generated by the system for their files. UWGSL and the DAP are not leveraged to issue payments for assistance allocated through this program. Agencies receive direct funding from FEMA and are required to pay assistance they have claimed.

- 5) **Donor-Sponsored Energy Assistance Programs** – The DAP is used to administer and allocate direct assistance funds provided from donors, corporations, sponsors or grant funders that operate specific or seasonal programs and for whom United Way processes payments to utilities or other vendors on behalf of agencies and their clients.

- 6) **Emergency Fund Network (EFN)** – EFN is a UWGSL coordinated network of agencies located within and servicing UWGSL's primary 16 County service area. Eligible agencies, through the DAP's closed loop functionality, can share client case information and requests for leverage funding among participating agencies in hopes of getting shared funding to meet needs of individual cases. Agencies that commit funding to select cases are responsible to pay committed amounts to service vendors on behalf of requesting agencies and their clients'

UWGSL, as the DAP administrator, is responsible for the following:

- 1) To maintain the DAP web page and portal in a secure environment and make reasonable efforts to assure servers are regularly maintained and updated in order to limit exposure of data on the system.
- 2) To create and maintain funding programs and rule structures per directive of individual donors and funders and to customize products and solutions per appropriate specifications.
- 3) To create and maintain approved agencies within the system and grant appropriate programmatic and user rights for the various system products.
- 4) To designate, create, maintain and update no more than two agency administrative users for each agency. Agencies' designated administrative users will be the same for all DAP programs in which they take part within the portal.
- 5) To process payments to utilities on behalf of agency clients for appropriate portal products on a semi-monthly basis unless specified otherwise by program rule structures.

Agencies/partners participating in any portal program are responsible for the following:

- 1) To designate an agency administrator (up to 2) who is responsible for and able to create new users, manage existing users and disable expired users for their agency as staff changes occur.
- 2) To certify and assure that agency-specific users are assigned their own user credentials and profiles and ensure that single user credentials and profiles are not shared among multiple users. Also to encourage agency users to employ and maintain solid data security practices and strong user ID and password protocols.
- 3) To not transmit any material in violation of any federal, state or local regulations. This includes, but is not limited to, copyright material, material legally judged to be threatening, financial data, obscene or material protected as trade secrets.
- 4) To not cause, in any manner or way, known or intentional corruption of the database.
- 5) To not use the portal with intent to defraud federal, state, or local governments, agencies, individuals or entities, or to conduct any illegal activity.
- 6) To have internal agency and fiduciary controls and processes in place to assure the review and approval of client pledges for eligibility and appropriateness.
- 7) To be knowledgeable of and to abide by program guidelines instituted by UWGSL and/or funders sponsoring a particular program managed through the DAP.

- 8) To have internal policies and procedures in place regarding the provision of direct assistance for clients, confidentiality, financial record-keeping, etc. and to assure agency users are trained in those policies and procedures.

Regarding Client Information and Confidentiality for Agencies:

- 1) UWGSL, in its role as portal administrator, will make efforts to design the system to minimize the amount of required client-level information available to agency users while still employing the standard of using social security number data and other primary sources of identifying information to appropriately identify clients and track their awards of assistance for the products managed in the DAP in a non-duplicative manner.
- 2) UWGSL administrators and direct assistance managers/specialists acknowledge and understand that they may have access to client level data regarding all clients served within the portal across various programs contained within. UWGSL reserves the right to aggregate data for reporting purposes and make it available to agencies and funders or other organizations that are or are not part of the portal or use it in furtherance of program reporting, effectiveness or in seeking grants or other funding. Such aggregate data must not directly identify individual clients during any instance.
- 3) All agencies using the portal certify that they have internal policies and procedures in place regarding client confidentiality and privacy and that all clients entered into the system have signed appropriate releases (or provided required acknowledgement) authorizing their data be shared with other service providers.
- 4) All agencies shall abide specifically, when applicable, with the provisions of the Health Insurance Portability and Accountability Act of 1996 ("HIPA") and corresponding regulations passed by the Federal Department of Health and Human Services.
- 5) UWGSL as direct service provider is responsible to adhere to all matters of confidentiality for which other agencies are responsible for same.
- 6) Agency DAP administrators and supervisory personnel certify by their agencies' use that they are familiar with agency confidentiality policies and enforce such policies to ensure the security and confidentiality of the portal database and its Client information. And they certify that agency DAP users are trained annually with regards to matters pertaining to client confidentiality.
- 7) Agency DAP users certify they will abide by their agency's internal policies and procedures in place regarding the provision of direct assistance for clients, confidentiality, financial record-keeping, etc.
- 8) Agency users understand that by using the system that they will become privy to client information regarding direct assistance provided by other vendors for specific clients, and that client information they enter will become available to other agencies in the normal course of their use of the portal.

Agencies unwilling to abide by the terms of this UWGSL Direct Assistance Portal Agency Partner Client Confidentiality and Release of Information Agreement shall immediately cease and desist in its use and notify UWGSL to terminate user rights to the DAP.

By accepting the terms of this agreement, each agency user agrees they have read, understood and will abide by this UWGSL Direct Assistance Portal Agency Partner Agreement in his/her use of the portal and the information contained therein.