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July 30, 2001

The Honorable Rodney S. Melville
Presiding Judge, Santa Barbara Superior Court
312-C East Cook Street
Santa Maria, CA 93456-5369

Subject: Public Health Department's responses to the 2000-01 Grand Jury Report titled:
"COUNTYWIDE DATA SHARING: BETTER WAYS TO SHARE"

Dear Judge Melville:

The Public Health Department thanks the Grand Jury for its work to identify and recommend improvement to countywide data sharing, and for the findings and recommendations contained in the report.

Please note our department relies on Risk Management Services, a County contractor that specializes in medical malpractice and confidentiality issues, to review all of the Department's confidentiality agreements, not County Counsel.

Sincerely,

Roger E. Heroux, MPA, Director
Public Health Department
County of Santa Barbara

Enclosures: (1) Standard MOU with other County Departments
(2) Health services confidentiality law summary
(3) Confidentiality agreements

CC: William L. Cathey, Grand Jury Foreperson
1100 Anacapa Street
Santa Barbara, CA 93101

**PUBLIC HEALTH DEPARTMENT
RESPONSES TO THE FINDINGS AND RECOMMENDATIONS OF THE GRAND
JURY'S REPORT, "COUNTYWIDE DATA SHARING: BETTER WAYS TO SHARE"**

ISSUE I: CONFIDENTIALITY

Finding 1a: Any information that can be shared through the computer is subject to the same confidentiality laws as information that is exchanged by phone, e-mail, fax, or physical document exchange.

Agree.

Finding 1b: Without some type of computerization, much clerical and professional time needs to be committed to facilitate necessary data exchange within the County.

Agree.

Installing and using "computerization" also places significant demands on clerical and professional time.

Finding 1c: All confidentiality laws regarding client information are strictly interpreted and respected by all County Departments. Formal, written agreements to share data between Departments are reviewed by the County Counsel.

Agree.

All of the Public Health Department's formal written agreements (Memorandums of Understanding or MOUs) with other County departments include standard language protecting the confidentiality of patient information no matter how it is transmitted. The MOUs are not reviewed by County Counsel.

The Public Health Department has all of its employees, contractors, and volunteers sign a confidentiality and business agreement as part of the hiring process (Attachment B). Clinic employees receive training on confidentiality at least annually by Risk Management Associates. Risk Management, Associates, a contractor with County General Services to provide malpractice prevention training and defense reviews all of the Public Health Department's confidentiality agreements, not County Counsel.

Relevant patient information confidentiality laws include:

1. Code of Federal regulations, Title 42, Volume 1, Parts 1-399 (Drug & Alcohol)
2. California Welfare and Institutions Code Sections 827-830.1, 4514, 5328, 10850, and 18986.4-19896.46
3. California Education Code 49069, 40976, 49602

4. Public Law 104-191 known as the Health Information Portability and Accountability Act (HIPAA).

The Public Health Department serves as the chair of a Countywide project team to analyze how the Health Information Portability and Accountability Act of 1996 (HIPAA) will impact the sharing of data. HIPAA calls for standardization of electronic patient health, administrative and financial data and security standards protecting the confidentiality and integrity of “individually identifiable health information” past, present, and future.

ISSUE II: GRANT SUPPORT

Finding 2a: Collaborative efforts between Departments generally provide for a continuum of client service, without redundant and costly program development, benefiting all citizens and taxpayers of the County.

Agree.

The programs listed by the Grand Jury on Page 12 are good examples of collaborative, inter-departmental grants. The Public Health Department is exploring public-private data sharing in its Proposition 10-funded Welcome Every Baby (WEB) grant and the Care Data Exchange Project grant.

Finding 2c: Grant reporting is mandatory and specific. Data collection needs to be error-free and timely. There is more scrutiny of grant reports, and more documentation is now required than in past years for subsequent or continued award of grant monies.

Agree.

Finding 2d: Collaborative grants require more formal coordination between County Departments than do block grants, as they attempt a comprehensive solution to a particular social need.

Agree.

Recommendation 2: Santa Barbara County should continue to pursue aggressively grant opportunities to increase County services, thereby leveraging taxpayers' dollars.

Agree- Implemented.

No significant changes to current practices are planned.

ISSUE III: REDUNDANCY OF DATA COLLECTED

Finding 3a: The same information is often input about each client in each Department for grant reporting every time the client is seen.

Agree.

There is limited overlapping data. Basic identifying information such as name, age, address, telephone number, and financial class are verified, updated, and input into databases in each Department each time the client is seen. Department specific data is not shared.

The Public Health Department is developing a web-enabled Public Health Nursing (PHN) database that will integrate data for the following programs: Maternal and Child Health, Homeless, Communicable Disease, Tuberculosis, Lead, and Seniors.

Finding 3b: There is unnecessary duplication of information input into multiple Departments' data storage, to try to assure that grant reporting is not compromised.

Agree.

Finding 3c: If the reported information to the granting agency for client services or clients served is inconsistent between Departments, the granting agency may deny funds.

Agree.

However, none of the health and human services departments is aware of it ever happening.

Finding 3d: Duplicated information makes data retrieval more cumbersome and time-consuming, and is frustrating to staff. This costs the taxpayers money.

Agree.

Recommendation 3: Redundant information should not be collected and entered by County Departments, on a variety of forms, to fulfill the mandates of the funding agencies and the reporting and budget requirements of the County. This duplication wastes computer storage as well as professional and clerical time, makes data retrieval more cumbersome, and costs the County money.

Will not be implemented.

The recommendation is not feasible due to different mandates and required forms. The Grand Jury's recommended action is not clear. Funding agency mandates and County reporting and budget requirements must all be met.

Finding 4a: Departments collect identical client data and service information on multiple (paper or computer) forms. Often the same data is collected on three different forms (one for grant reporting, one for the Departmental collaboration, and one for the Department's own internal use) for each contact with the client. Although this makes data input easier, it uses valuable computer and file storage space and makes data retrieval difficult.

Disagree partially.

Data retrieval is sometimes easier if data is recorded in more than one area. If the software is unfamiliar or the record needs to be easily accessed in hard copy, multiple entry may make sense.

Finding 4b: If the source person enters the data, instead of the information being passed to a clerk, it leads to increased accuracy and confidentiality. Some of the "line" staff may be doing more work that seems clerical because of this shift in duties, and see this as an extra burden. However, it is a function of the quality of data that the County must now demand.

Disagree.

Physicians and other professionals time is used more wisely and cost effectively by writing orders in the chart and having the nurse or aid complete the laboratory requisition or referral to a specialist. Billing documents are reviewed for accuracy and completeness before data entry to make sure that payment is received. It is neither reasonable nor the community standard of practice to have a professional "source person" enter the data instead of aides and clerks.

Recommendation 4: Discrepancies between the client information used to provide services and for grant reimbursement should be avoided. Data entered into Departments' databases should be manipulated by as few people as possible. Management should find ways to facilitate the data input tasks of line staff to assure the highest degree of accuracy and confidentiality of the stored information.

Has been implemented.

Each department determines the best plan to capture and enter data before implementing the process, and re-evaluates that process on a continual basis.

Soon the Public Health Department will be using personal digital assistants (PDAs better known as “palms”) for the public health nurses to enter data directly while they are in the field. One of our quality improvement teams last year looked at the Patient Registration process to improve data collection and patient flow. One result is that patient demographic data is now entered only once and then transferred electronically to the clinical laboratory system.

Finding 5a: Repetitive data input allows less professional time to be available to client services, lessening employee job satisfaction. Redundant and repetitive data collection also wastes the time of the client.

Agree.

Finding 5b: Repetitive data input allows for more mistakes to be made, which requires more employees’ time to find and rectify the data discrepancies.

Agree.

Finding 5c: Discrepancies in client information, which are uncorrected in different Departments’ databases, can lead to reporting errors in mandatory grant reports. Errors in grant reports may compromise categorical (grant) funding, which can be costly to the County.

Agree.

Finding 5d: In addition to wasting service professionals’ time, more clerks are needed as a result of redundant and repetitive data collection. More employees in a Department use more valuable County "real estate."

Agree.

Recommendation 5a: Repetitive data input by clerical and especially line staff should be minimized.

Has been implemented.

Opportunities to reduce inefficiencies in data input activities are implemented as described in the response to Recommendation 4.

Recommendation 5b: For Departments partnered in collaborative grants and serving the same client, data should be shared. Apportionment of costs for licensing software and automated access to specific fields of client data, respecting all confidentiality laws,

should be established to reduce redundant data collection and data inconsistency that might threaten continued grant funds.

Will not be implemented.

It is not feasible. Confidentiality and mandated systems are major barriers. However, collaborative departments facilitate access to necessary information.

Other than general demographic data, the data required by each department is different and often dictated by the State or federal funding source. Patient confidentiality laws permit that data is shared only on a “need to know” basis.

Recommendation 5c: The protocol (responsibility) for shared client information updates should be established by inter-departmental agreement, respecting all confidentiality laws.

Has been implemented

See Attachment A – The Public Health Department has standard inter-departmental Memorandum of Understanding language regarding confidentiality of information and data. Some information sharing is State-mandated and, therefore, does not require inter-departmental agreement (for example, Social Services referrals to Public Health for the Child Health Disability Prevention (CHDP) and Women Infants and Children (WIC) programs.)

HIPAA will require “Business Partner Agreements” with some departments. The Countywide HIPAA project team is developing agreements to meet these new standards for individually identifiable health information.

Recommendation 5d: Collaborating Departments serving the same client should establish regular discussions to understand their partner’s data collections and needs, which may be different than that mandated by the grant.

Agree - Has been implemented.

ISSUE IV: TIMELINESS OF COUNTY DATA ACCESS

Finding 7a: There is a reasonably good infrastructure for reviewing and approving technology projects with the coordination of ITAC and ISAC (See Appendix D for the ITAC mission statement). However, ITAC members are all busy people with their own jobs and there has been little County monetary support for this effort. The County needs to provide more leadership in this arena, but not more control.

Agree- The technical support that ITAC provides to ISAC has worked fairly well during the first two-plus years ITAC has been in existence. The principal reason that ISAC formed ITAC was to provide ISAC with a wider range of technical advice than it had previously received. Prior to forming ITAC, ISAC's only regular source of technical advice was the Data Services (now ITS) Director. Still, the "infrastructure for reviewing and approving technology projects" needs to be further formalized and strengthened to ensure that all significant technology projects are reviewed and tracked. While the coordination between ISAC and ITAC is "reasonably good," it means little without there being more "control" over subjecting projects to ISAC review.

Support has been provided to ITAC; a Project Manager in General Services assigned to convene and support ITAC. This position, however, has turned over frequently, and the makeup of its other duties has changed. The instability of this position has resulted in less than optimal staff support for ITAC. With greater stability and commitment by the position, the resource will be sufficient to support ITAC. In addition, the CAO's Project Manager responsible for the Countywide project tracking system will be working with ITAC and ISAC to strengthen project review procedures.

We disagree that ITAC participation is somehow outside of members' "own jobs." Achieving better coordination among departments within the County's highly decentralized IT environment is an essential part of all IT professionals' jobs.

Finding 7b: The County Information Officer position in the context of a Data Sharing initiative, could be responsible to ensure that the County Administrator's needs were met, namely, that (a) a repository is available for data that is to be stored, (b) a common format is adhered to in data that is to be shared, and (c) process studies and data sharing discussions are regularly undertaken in all Departments.

Disagree.

A CIO could provide professional leadership to meet not only the County Administrator's needs, but also the needs of the entire organization. Given, however, the decentralized County structure, a CIO would not necessarily ensure organization-wide conformance on matters that are department prerogatives. Several months ago ISAC considered and generally supported a new CIO position to provide Countywide strategic leadership in information technology. The idea was not pursued because of the lack of authority that such a position would have, the expense of the position, and the anticipated difficulties of recruiting candidates for the position.

Finding 7c: Other potential responsibilities of a County Information Officer, if believed to be necessary under a Data Sharing initiative, could include

1. implementing the decisions arrived at in the ITAC committee,
2. providing forms, queries, and reports requested by the County Administrator, Departments, and the public (for public data),

3. administering MOUs and acting as an arbiter in data sharing issues,
4. coordinating or assisting in the coordination of all types of data for all types of purposes between Departments, and between the County and the public,
5. representing the "data sharing" initiative whenever IT projects are proposed by Departments or by ITS (Information Technology Services, the division of General Services that supports the network),
6. acting as the champion for data sharing efforts and assisting in determining that technologies that lend themselves to data sharing are embraced (such as Web-enabling), and
7. acting as a resource to the Board of Supervisors, which currently has no technical resource available for data/information gathering for its critical decision making processes.

Agree

However, ITAC is not a decision-making committee; it is advisory to the ISAC. The CIO could help implement decisions of ISAC. Also, the statement that "the Board of Supervisors...currently has no technical resource available for data/information gathering for its critical decision making processes" is incorrect. Such technical resources reside in General Services' ITS Division, and in virtually all of the County's departments. The Board is further served by one of its Members sitting on ISAC.

Recommendation 7a: A central person or group should be identified to coordinate the analysis of data sharing within the County. The County's ITAC committee (ISAC Technology Advisory Counsel) could provide leadership.

Agree (with response with change in emphasis) - Has been implemented.

ISAC's Charter describes that ISAC's mission is to "provide fully integrated corporate information management systems which maximize access to information in a cost effective manner while meeting corporate, departmental and public needs." One of ISAC's chief goals is to "[e]nhance utilization of data as a shared, consistently derived, corporate resource." ITAC, in its advisory role to ISAC also serves as a central coordinating body.

The data inventory to be undertaken as part of the Countywide IT Assessment is a crucial first step in analyzing Countywide data sharing. The annual update to each department's Data Warehouse Project also document existing and potential data sharing opportunities and challenges.

Finding 8a: Information has been exchanged between Departments for many years to provide appropriate and timely service to County citizens. Confidentiality laws regarding client information have long been respected, and continue to be so.

Agree.

Finding 8b: The Countywide network and data access continue to be a valuable mechanism of timely communication needed by the County. However, communication between Departments and the quality and quantity of data exchanged needs to be improved.

Agree.

Recommendation 8: The Countywide data system should continue to be supported. However, to assure valuable access to timely information among County Departments, it is no longer sufficient for real data sharing activities that should and could happen. The ITS should continue with the conversion to the higher capacity protocol of Ethernet, which would facilitate data sharing activities.

Has been implemented.

The Strategic Network Upgrade Project is implementing Ethernet, and remains committed to do so.

Finding 9: The public would be better served if users were not interrupted during the County's service day by the installation of a technology project.

Agree.

Occasional interruptions are sometimes unavoidable. One of the Public Health Department's performance measure is to limit file server downtime to a maximum of 2% of 2,000 working hours per year. Technology upgrades are scheduled for weekends or in the evenings.

Recommendation 9: A "flex-schedule" for those IT and ITS professionals responsible for technology installation should be instituted.

Has been implemented.

Examples of recent installations include the Probation and Auditor Ethernet conversions. These installations were accomplished largely during evenings and weekends with minimal disruptions to operations.

ITS heavily uses flex-schedules and overtime to try to minimize the impact of changes to departments. However, since many critical County systems require 7x24 availability, new systems and network upgrades are being increasingly designed for continuous availability.

Finding 10: A Countywide e-mail service medium is invaluable, disseminating County information quickly, efficiently, and economically.

Agree.

Recommendation 10: "GroupWise," the Countywide e-mail service, should be changed to include those Departments not presently included, especially the Sheriff's Department. Efforts should take place expeditiously to combine all County e-mail service into the most efficient system.

Has been implemented.

All departments can receive and send email Countywide. A project to convert the GroupWise email system to a Windows 2000 based exchange system is scheduled to begin 4th quarter of 2001.

Finding 12a: The decision to pursue any type of technology, whether by data warehousing, Web-based Data Sharing, or any other process, must be based on sound business reasons that further the strategic plan of the County and of the Departments involved. Sound business planning for a joint technology project is achieved by

- discussion between County professionals, supported by budget allocations,
- involving IT managers at the early stages of any collaborative projects,
- assessing and reviewing these discussions by an arbiter to resolve any impasses and to identify further opportunities, and
- prioritizing technology spending based on needs/benefits analyses.

Agree.

Agree that decisions to adopt or not adopt new technologies should be based on sound business reasons. Disagree that the suggested components of "sound business planning" are sufficient or entirely accurate. For example, budget allocations specific to supporting "discussions between County professionals" are not necessary. Such "discussions" are already an integral part of these professionals' job responsibilities. Also, state requirements and the need for County system to be compatible with Statewide systems drive some of the County's significant decisions about technology. Finally, the ITAC/ISAC risk assessment process is a critical element of sound planning on which the County relies.

Finding 12b: The UCSB Data Warehouse project did not go through the appropriate steps necessary for sound business planning.

Disagree.

The decision to increase the County's sponsorship of UCSB Economic Forecast Project's (EFP) from \$20,000 to \$72,000 was based on sound business planning, and

four years of experience working with EFP in producing the County's Strategic Scan presentation. The primary purpose for the increased sponsorship is to obtain greater assistance from EFP in preparing and presenting the County's annual Strategic Scan and periodic updates to the County Strategic Plan. With the increased sponsorship, EFP has committed to dedicating a full time staff person to supplement the partial staff time otherwise provided by EFP's professional staff. The need for this additional resource was based on the cumulative experience from prior years' Scan presentations, and particularly with the addition last year of the Introduction to the Strategic Scan and the identification of strategically critical issue areas.

It is apparent from the Grand Jury's report that this finding is based on several misconceptions about this project. Contrary to what is reported by the Grand Jury:

- There is a "published" project plan in the form of a June 5, 2001 memorandum from Deputy County Administrator Scott Ullery to department heads on the subject "Data Warehouse Project with UCSB Economic Forecast Project (EFP) and Strategic Plan" (see attached);
- The project does not entail committing capital funds to "buying" an actual Data Warehouse through UCSB at a cost that "will total \$1,000,000 to \$2,000,000 per year;" and
- There will be no "relinquishing management of...data to an outside agency. Participating departments will maintain full control of all their data.

If these and other misconceptions were in fact true, then we could certainly agree with the finding.

With regard to the Grand Jury's four components of sound business planning as listed in finding 12a: 1. Discussions with and support of the County's ReGIS manager, the Auditor-Controller, Budget Director, P&D Director, General Services Director, and Public Health Director did take place; 2. IT Managers from General Services and the ReGIS Manager were involved early; 3. There was no impasse requiring resolution, and 4. The need/benefits of the project were analyzed fully.

Recommendation 12: Joint technology projects of the County should be carefully planned and formalized, in ISAC and ITAC, to save staff and managerial time in data retrieval for years to come.

Has been implemented.

The bulk of responsibility for carefully planning technology projects is rests with the departments that will be using the new application. All new technology projects of significant size (over \$100,000) are expected to be brought to ISAC for analysis (with technical assistance from ITAC), and many have been. A formal assessment process

has been established and used for this purpose, but not consistently. There are significant technology projects undertaken that are not reviewed and monitored by ISAC, but probably should be. ISAC can and should rededicate itself to being more involved as recommended. ISAC's effectiveness is predicated to a considerable degree on the cooperation of departments.

Finding 13a: Relevant information to be included in any joint technology projects is identified only by discussion between Departments. This is a necessary, up-front cost that must be considered and supported to assure relevant, accurate, and timely data for decision making.

Agree

Finding 13b: Data users and data contributors to a joint technology project do not perceive identical benefits from the sharing arrangement. This can, at times, create lengthy discussions between Departments that are data users and those Departments that are data contributors. These discussions are inevitable and should be accommodated by the budgets. The lines between these two groups, however, blurs if the sharing arrangement is carefully planned—i.e., data users will become contributors and vice-versa.

Agree.

ISSUE V: COSTS OF DATA SYSTEMS

Finding 15a: The capabilities of the ReGIS system and its application to County business are considerable.

Agree.

The Public Health Department has a half-time Geographical Information System (GIS) map technician who works closely with ReGIS to map sewer systems, vulnerable populations, and origin of animals and patients with communicable diseases.

Finding 15b: The technical prowess of the County professionals who created ReGIS, and their familiarity with County business are considerable.

Disagree.

The ReGIS staff is not familiar with the Public Health Department's business needs.

Recommendation 15: The County should support ReGIS through appropriate budget allocations, and not lose the investment that has been made, both in terms of hardware and the professionals who developed it.

Implemented? Implementation is the responsibility of the Treasurer-Tax Collector, County Administrator, and Board of Supervisors, not the departments.

Finding 16b: Data Sharing and the ReGIS initiative are complementary in their access to and quality of data.

Agree.

ReGIS is a data-sharing project that provides accessible and good quality data.

Recommendation 16: Data Sharing should be pursued in combination with the ReGIS initiative to provide the highest quality data in a timely and accessible way to the County.

Has been implemented.

The data warehouse project has begun to identify data sources and data characteristics throughout the County, and is proceeding in concert with the ReGIS project. A product of the both data sharing projects is timely and accessible data.

Finding 17b: The "means" of data sharing need to be considered in the data sharing discussions, because of the costs. The County, as all public and private institutions, prioritizes needs and allocates resources accordingly, since resources are, by definition, scarce.

Agree

Recommendation 17b: The County should have a policy of fostering "open" systems (see footnote 2 on page 3) that make data sharing inexpensive and easy.

Has been implemented.

The County's adopted technology of the network and file servers is designed to support open systems. ODBC compliant NT/SQL Server has been the de facto standard for systems development since 1995. The county is in the process of migrating to Windows 2000, which includes the open Web Services and .NET initiatives. Also, ISAC's evaluation criteria for new systems favors open systems.

Recommendation 17c: IT managers should be involved at the early stages of virtually all administrative policy and operating discussions.

Has been implemented.

This is the general practice in County departments for policy and operational matters that involve information technology. Whether or not the job scope for IT managers includes involvement in virtually all administrative policy and operating discussions is the prerogative of each department director.

The Public Health Department's IT Manager serves on the Grant Team and reviews computer needs of all grant applications. The PHD IT Manager is a member of the "Cabinet" or divisional managers level decision-making team.

Recommendation 17d: To encourage more data sharing, the County should set aside funding, apart from current operating budgets, for worthy data sharing projects for which the Departments could compete. This would encourage more data sharing and accelerate the process of improving County data communication.

Will not be implemented.

Collaborative rather than competitive data sharing is already being fostered. To set one department against another in competition for funding is antithetical to the concept of data sharing. All county budgets are established within the policy guidelines and principles of the Board of Supervisors.

Data sharing proposals should generally be encouraged, and each proposal should be evaluated on its merits. Achieving meaningful data sharing will likely require more than "set(ing) aside funding...for which the Departments could compete." Legal, institutional, technological, and other impediments to data sharing need to be understood and addressed. Also, data sharing projects will have a greater likelihood of success if they are based on collaborative efforts rather than competition. The Data Warehouse Project and IT Assessments will reveal a number of opportunities and impediments to data sharing, and is thereby an important step toward identifying worthy data sharing projects and encouraging more data sharing.

Finding 18a: Management responsiveness is an important factor in retaining good staff. Included in managerial responsiveness is user training of County employees, which is relatively inexpensive and available.

Agree.

Technical training programs are expensive, however, most Employee University class are only \$50 each.

Finding 18b: Despite the published information, not all Department managers are cognizant of the advantages of both the technical and organizational training available through the Employees University. Some do not actively encourage their staffs to avail themselves of these pertinent opportunities.

Disagree.

All Public Health Department managers and supervisors are aware of Employee University training programs. Staff is routinely encouraged to take classes as one of the Employee Performance Review work objectives.

Finding 18c: For security of the data sharing, and the efficiency of all users, training should occur prior to any inter-departmental access of data.

Agree.

Recommendation 18a: Considering the costs of hiring individuals in the open market, user training in technology tools should always be considered and budgeted for as part of the system development/acquisition cycle. The County should pay for this important technical training.

Has been implemented.

System development and acquisition projects always include user training as a budgeted component of the projects.

Recommendation 18c: The Employees University should pursue an alliance with SBCC to offer a broader range of specialized technical courses. The EU should organize and act as fiscal agent for inter-departmental technical courses provided by outside vendors at the request of the Departments involved.

Will not be implemented.

The EU does have an "alliance" with SBCC, but not for this purpose. Specialized technical training is not the mission of the EU.

Finding 19b: Departments that do not employ Systems Analysts, but hire outside vendors to implement isolated systems, or purchase off-the-shelf solutions without proper review, may lose the opportunity to make this valuable comparison of incremental costs of any new technology.

Agree.

Systems adopted without proper review can result in lost opportunities.

Finding 19c: At times, there can be problems with the reluctance of some Departments to share data, even though it is legal for them to do so. Some may cite spurious confidentiality issues if they feel that their data may reflect poorly on their Department.

Agree

There may be some departments reluctant to share data, but there may well be reasons other than “spurious confidentiality” claims or fear of looking bad.

Data sharing often raises legitimate confidentiality concerns, which need to be addressed through various security measures. Departments may be unable to share data easily because of increased costs of system development; systems supplied or mandated by the State or other agencies.

Recommendation 19a: All Departments should undertake a process study, based on the Probation model, as part of the planning process prior to any implementation of technology projects. This data-sharing process should be conducted with clerical and line-staff and should include data survey, IT management conferences, and formalized agreements.

Will not be implemented.

Process analyses are required for new system approval. The Probation model may not be applicable to every Department.

Recommendation 19b: All Departments should request their clerical staffs periodically to make lists of the information that is routinely requested of and by other Departments.

Will not be implemented.

Department clerical staff is not the only or best source for this information. Significant information requests are made of and by professional, technical, management, and executive staff. All departments are encouraged to be sensitive to input from all employees when studying process improvements.

Recommendation 19c: All Departments should meet, as necessary to discuss what information is needed from one another.

Has been implemented.

The various departments meet on a regular basis:

- Interagency Policy Council Meeting – 1st Monday each month
- MISC Cross Agency Managers Meeting – 1st Tuesday each month
- MISC Deputies Meeting – 1st Thursday each month
- Fiscal Managers Meeting – as needed
- CalWIN – as needed

- New Vistas Executive Oversight –monthly
- Welcome Every Baby (WEB) – weekly (in development)
- HIPAA – as needed, currently every month

Recommendation 19d: Data Processing Managers should meet periodically, as information accrues from other Departments, to evaluate opportunities for operational efficiency.

Has been implemented.

The new Probation system, Payroll system and Purchasing system are some recent examples of how this process has been followed.

Also, ITAC provides an additional forum for regular meetings and information exchange among IT managers.

The Health and Human Services agencies have regular meetings for HIPAA and CalWin.

Recommendation 19e: Technological assessments of specific data sharing should be used to create formalized agreements (MOU, contracts, etc.) between Departments. Legal review of the agreements should be obtained.

Has been implemented.

State mandated data and summary information can be shared without formal agreement.

Client specific data is only shared if individuals who will be using the agreement sign confidentiality agreements. The issue is more than an agreement between Departments. More important is the understanding of the individual employee who has access to the data. Annual training on the confidentiality of client-specific data is performed by the attorney at Risk Management Services in the Public Health Department and Alcohol, Drug, and Mental Health Services.

Confidentiality agreements are reviewed by the attorney at Risk Management Services, not County Counsel.

Recommendation 19f: There should be a mediation process to resolve data sharing disputes between Departments when a Department refuses to share allowable data. Perhaps the County Administrator's office, the CIO (should one be hired), or the County Counsel could act as broker to resolve such disputes.

Will be implemented.

On the infrequent occasions when serious disputes arise between departments, the County Administrator's Office has a role mediating and resolving disputes. To date, no serious data sharing disputes have been brought forward to the County Administrator. If any such disputes do occur, ISAC will investigate the situation and recommend action by the County Administrator.

The Health and Human Services departments share information routinely when permissible. These departments are unaware of any data sharing disputes.

Recommendation 20: The County should consider Web-enabled data storage and transfer as a necessary adjunct to the WAN. The Web-based and browser-based systems are the wave of the future (meaning the next three to five years).

Has been implemented.

Web-enabled systems are being considered and evaluated.

Web enabled systems are being installed including Special Districts, Probation and Payroll. For optimum efficiency in data sharing, the WAN should continue to be a shared common resource. Departments should be discouraged from building separate independent networks. Similarly, a shared common authentication directory structure should be encouraged for optimum data sharing.

The Public Health Department is developing web-enabled Public Health Nursing database and participating in three web-enabled collaborative projects: Tri-counties immunization registry, the Welcome Every Baby (WEB) program, and the Care Data Exchange project.

Recommendation 21: Established and emerging expertise in the County in Web-enabled data storage and transfer should be utilized to expand the full potential of operational and technical issues associated with Data Sharing. This would be cost-effective, given the expense of consultants and the benefits of Data Sharing for County service delivery.

Has been implemented.

County staff resources are being used and are continuously increasing their skills.

Finding 22: The County already has, and is developing additional, Web-enabled databases in many of its Departments. These Web-enabled databases are significant resources that will allow easy access to this valuable archival information, for timely design of County services. The Board of Supervisors can spur more and quicker improvement of County service with appropriate encouragement.

Agree.

Recommendation 22a: The County should prioritize more and better utilization of the County-wide Data Processing network, as well as creating Web-enabled databases (Data Sharing) between Departments involved in collaborative grants, in order to improve County service. This will also assure that grant funds, based on service reports to granting agencies, will continue to support County needs.

Has been implemented.

The County as a whole is making use of these technologies. General Services is undertaking a two-year project to migrate the existing Token Ring network infrastructure to a high speed, Switched Ethernet, IP based infrastructure. The project is focused on the infrastructure that switches and routes data traffic within the County WAN environment and to other public and government networks.

Recommendation 22b: All IT projects of the County should go through needs/cost assessment processes and publish project plans so that priorities are well defined and understood, and so that County planning is comprehensive.

Has been implemented.

Each department is responsible for assessing its needs and planning projects. All proposed projects with a cost of \$100,000 or more are evaluated by ISAC, with technical assistance from ITAC.
