

CIE Toolkit In Depth

Webinar 4: CIE Toolkit In Depth: Prepare a Legally Compliant Framework & Adopt an Interoperable Technology

March 21, 2019

10:00 am – 11:30 am (Pacific)



Introductions



Beth Johnson, MPH

Director of Strategic
Initiatives



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Vice President Of Health
and Community Impact



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Chief Technology Officer



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Legal Consultant

What is a Community Information Exchange (CIE)?





Person-Centered Model

www.ciesandiego.org/toolkit



This toolkit was made possible through a generous grant from the Schultz Family Foundation

Why a Toolkit?

- Share San Diego's long history developing, growing, and maintaining its CIE
- Support the nationwide movement around capture and use of social determinants of health data to promote individual well-being as a foundation for more holistic approach to community health
- Provide communities across the country with insights and strategies on how to approach development of a local CIE



Toolkit Sections



Section 1: What is a Community Information Exchange

Learn about the features and benefits of developing a CIE, including how the CIE creates community impact.



Section 2: State of the Field

Discover the influences that shaped the conceptualization and evolution of the CIE.



Section 3: Insights and Strategies

Explore the six strategies essential to developing an effective and sustainable CIE.

Toolkit Features



Purpose



Action Checklist



Practical Application



Glossary



Resources/Templates

Section 3: Insights and Strategies

www.ciesandiego.org/toolkit



This toolkit was made possible through a generous grant from the Schultz Family Foundation

- I** Identify the CIE Vision and Governance
- M** Mobilize the Community Network
- P** Prepare a Legally Compliant Framework
- A** Adopt Interoperable and Scalable Technology
- C** Cultivate Sustainability
- T** Transform the Movement





Prepare a Legally Compliant Framework



Why is this important?

- Sharing data among multiple partners requires a solid legal framework and protocols that comply with federal, state and local regulations.
- CIEs that include health providers are required to meet **Health Insurance Portability and Accountability Act (HIPAA)** requirements for sharing **Protected Health Information (PHI)**.
- Other federal compliance regulations govern the use of **personally identifiable information (PII)**.





Action Checklist

1. Set Standards for Network Partners
2. Establish Standard Consent
3. Define Roles for Health and Non-Health Partners
4. Establish Standard Security and Privacy Measures



1. Set Standards for Network Partners



Create a Team of
Legal Advisors



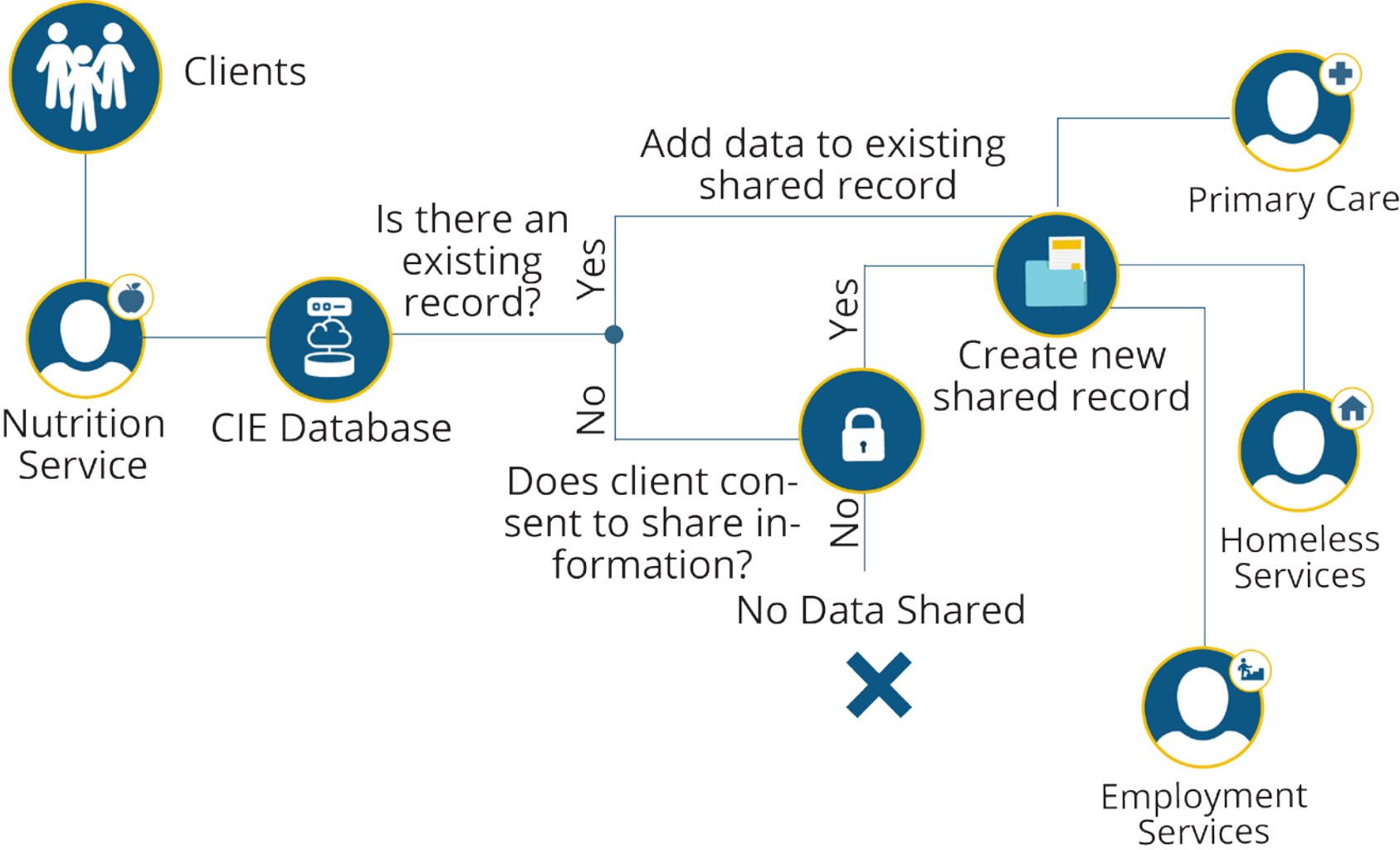
Develop Formal Data-
Sharing Agreements

Create a Team of Legal Advisors

- Become familiar with health information privacy and security laws
- Create a legal team that understands the CIE vision
- Create a legal framework that complies with the privacy and confidentiality guidelines

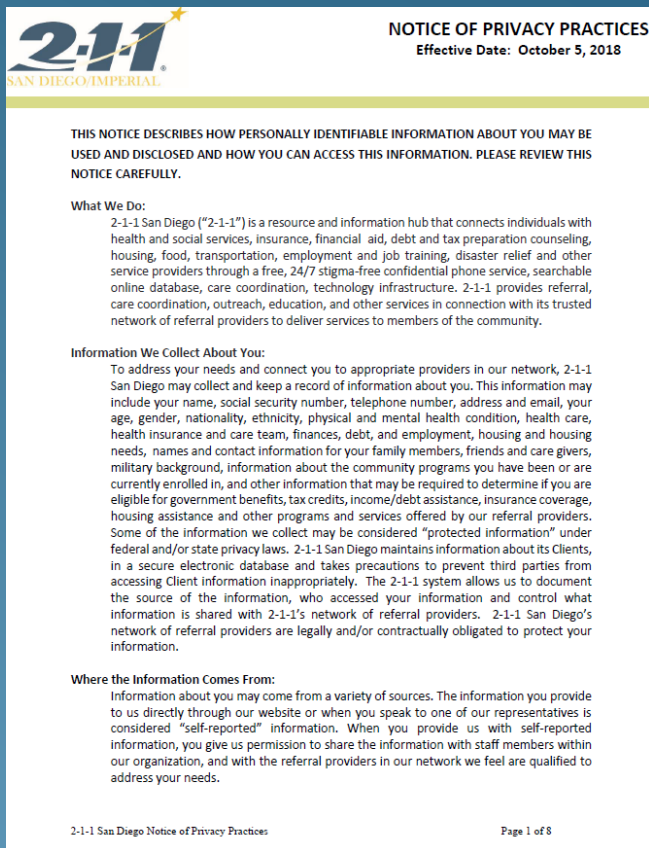


Decision Tree

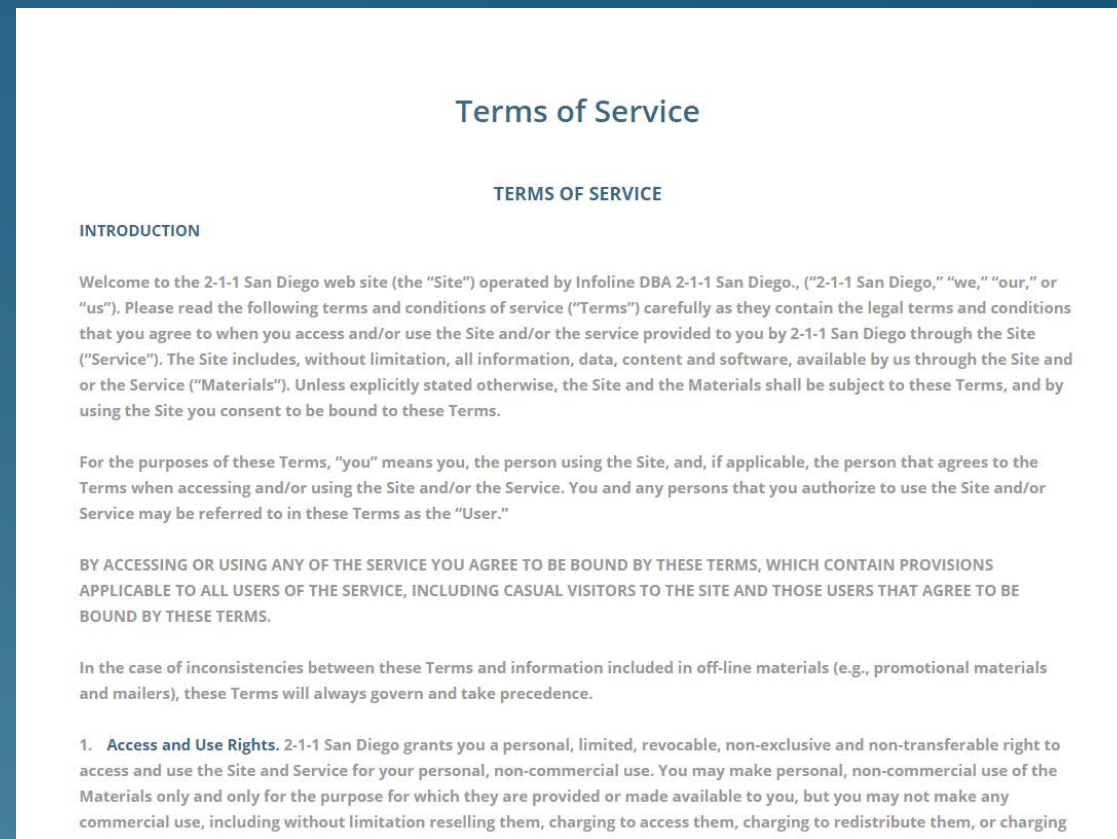




Develop Formal Data-Sharing Agreements



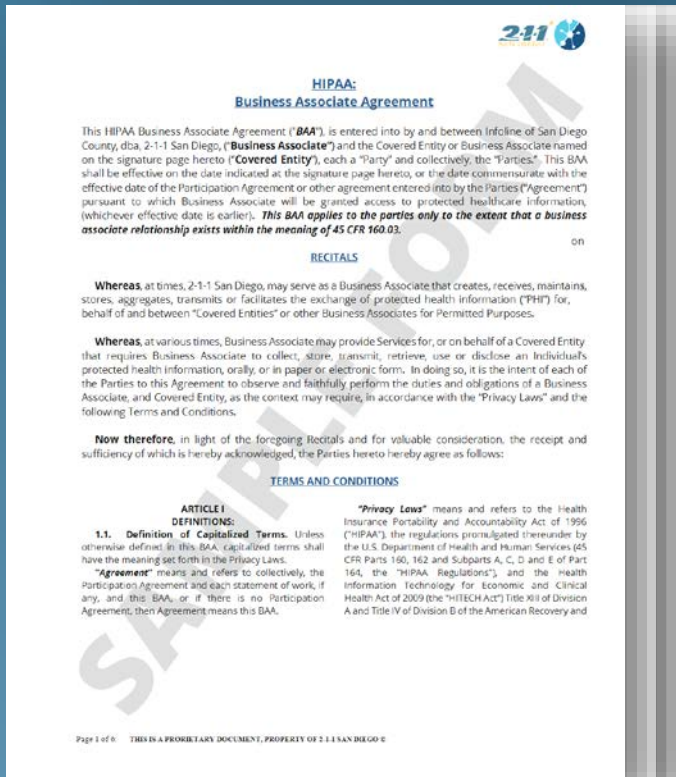
Privacy Practices



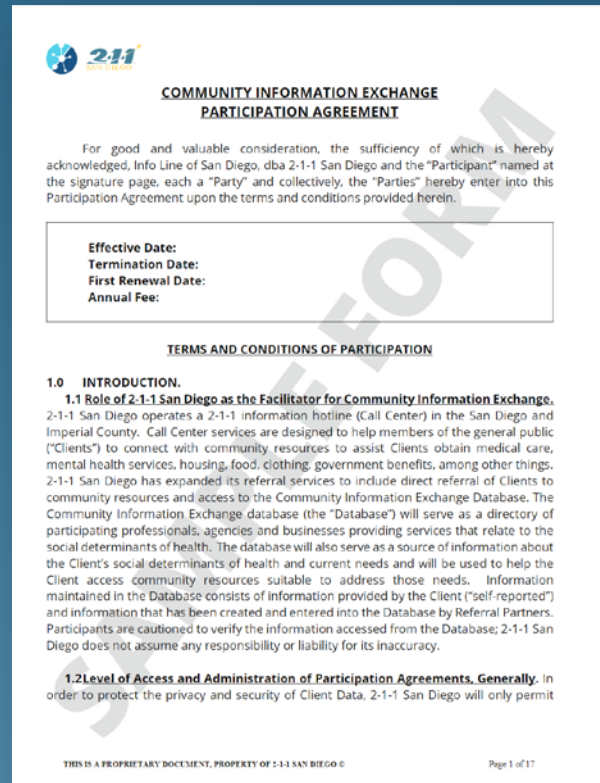
Terms and Services



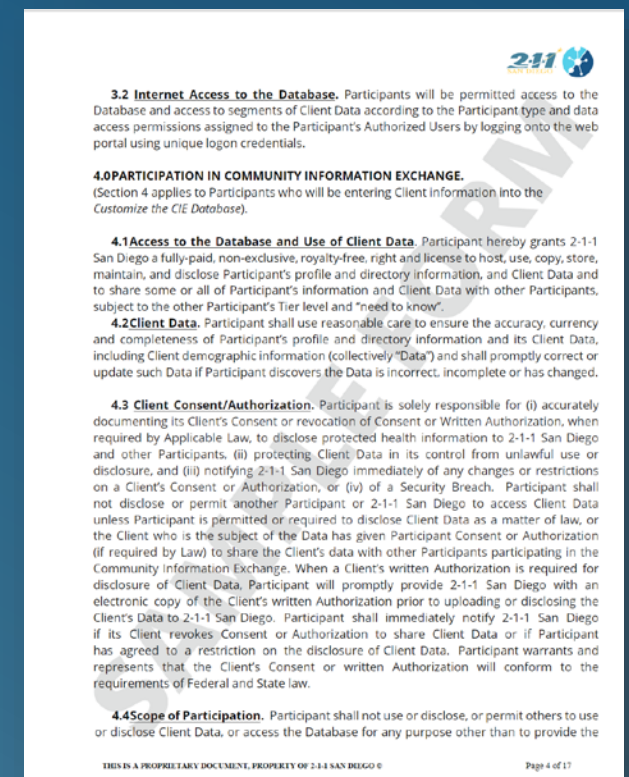
Develop Formal CIE Agreements



Business Associates Agreement





Participation Agreement



Service Level Agreement



Partnership Agreements: Data Use Agreement

 211 SAN DIEGO – COMMUNITY INFORMATION EXCHANGE PARTICIPANT DATA USE AGREEMENT	 211 SAN DIEGO – COMMUNITY INFORMATION EXCHANGE PARTICIPANT DATA USE AGREEMENT
PARTICIPANT: Participation Agreement Date: _____ Business Associate Agreement Date: _____ Primary Services Provided by Participant to Clients: Individuals experiencing homelessness Data Access: <input type="checkbox"/> View Only <input type="checkbox"/> View with Download Capability – One Way <input type="checkbox"/> View with Download Capability plus Exchange (Bi-Directional) <input type="checkbox"/> Other: _____	DATE: _____ transmitted to the CIE through an electronic interface, Participant, at Participant's sole expense, shall cause its software vendor to either (i) develop a work around or custom software for the interface, or a fix to correct any system errors, or (ii) Participant will utilize another method for transmitting Data to the CIE in regular, agreed upon intervals. (c) The CIE and the Participant has obtained their Client's consent to share Data with the CIE and CIE Participants. Participant will not disclose PHI to the CIE or other Participants through unless otherwise permitted by Applicable Law, and/or the client's written authorization. (d) Members of Participant's Homeless Information Management System (HMIS) who are also CIE Network Partners of the CIE do agree to share all available Data noted in Addendum 1 (e) Agreement to this DUA for organizations who are both HMIS Members and CIE Network Partners are captured in Addenda 2 – 24 and is effective as of the Date indicated in the corresponding Addendum
Data Use Terms and Conditions	Term: This DUA shall commence on the Effective Date and terminate commensurate with the Participation Agreement. Following termination, Participant shall continue to protect Data in its possession as required by the terms and conditions of the Participation Agreement, and Business Associate Agreement (if any), which by their terms, survive termination of this DUA.
Whereas, 211SD seeks to promote the efficient, confidential and effective use of Data in connection with referral and other services provided to Clients by 211SD, and its CIE Network Partners. Whereas, some or all of the information to be disclosed to CIE (Data) or disclosed by CIE to a CIE Network Partner may be protected under Applicable Law, including without limitation, HIPAA, CMLA and the California Privacy Act of 2018. Now Therefore, Participant agrees to provide CIE and CIE Network Partners, who are participants of the CIE, access to Participant's Data in accordance with this DUA and Applicable Law.	Fees: Unless otherwise specified in the Participation Agreement, Participant shall pay CIE a fee for access and use of the CIE and Data as follows: Use of the System. Participant will use good faith efforts to participate in the CIE and use the System in compliance with 211SD Policies and Procedures which are available at www.211sandiego.com and all Applicable Laws. Participant shall regularly submit Data to the CIE as indicated in the Addendum 1, in a format to be agreed upon when the parties commence onboarding activities. In every case, Data transmitted over the internet shall be encrypted.
TERMS AND CONDITIONS FOR DATA USE AND EXCHANGE	Authorized User Training. Participant will, at its own expense, provide to all persons who will be accessing Data ("Authorized Users"), appropriate training regarding, without limitation, proper use of the System and Data exchanged with the CIE and/or, viewed, accessed or downloaded to the Participant's system from the CIE. Participant will maintain reasonably detailed logs and records of its Authorized Users, notify CIE promptly if any Authorized User's access is terminated or Data Access Privileges have changed, and Authorized User training activities, which shall be provided to 211SD pursuant to an audit, from time to time. Use of Data. Participant (and its Authorized Users) shall limit their access to the CIE and use of Data to a Permitted Purpose, as defined in the Participation Agreement. Violation of this provision may result in immediate termination of both this DUA and the Participation Agreement.
Page 1 of 28 CIE: Data Use Agreement 01032019	Page 2 of 28 CIE: Data Use Agreement 01032019



2. Establish Standard Consent



Set Standards Based
on Information Sharing



Establish Consent
Model



Opt-In Data Sharing



AUTHORIZATION FOR THE USE AND DISCLOSURE OF INFORMATION

Community Information Exchange

You are authorizing Infoline of San Diego County, dba Community Information Exchange (CIE) and its Partner Agencies to use, store and share your personal, financial and health information with each other in order to assess your needs, coordinate your care and provide services to you. Partner Agencies participating in the CIE are listed at www.211sandiego.org.

This Authorization covers, without restriction, all information disclosed and re-disclosed to CIE by you, your family, Partner Agencies including your care team, or any other person involved in your care while this Authorization is in effect. CIE and its Partner Agencies may share your personal, financial and health information. You agree to notify CIE if your information changes or is incorrect. Information disclosed pursuant to this Authorization may be re-disclosed and no longer be protected under applicable privacy laws. Your refusal to sign this Authorization will not adversely affect your ability to receive health care or services from Referral Agencies directly.

Notice of Privacy Practices posted at www.211sandiego.org explains how CIE uses and protects information, how to get a copy of this Authorization and your record. You can revoke this authorization at any time by sending notice to CIE at revoke@211sandiego.org, allowing a minimum of **five business** days to process. Revocation will not affect any information previously disclosed in reliance on this Authorization. Unless revoked earlier, this Authorization will expire in **Ten (10) Years, or on the following Date:**

☐ I authorize for CIE to use and disclose information relating to, Drug/Alcohol/-Substance Abuse, Mental Health, and HIV/AIDS.

If you agree, sign your name below:

CLIENT INFORMATION

Today's Date: ____/____/____

Client's Full Name: _____

DOB: ____/____/____ Last 4 or full SSN/4 digit

PIN: _____

Client's Signature: _____

Agency Name: _____ Care Coordinator

Name: _____

THIS IS A PROPRIETARY DOCUMENT, PROPERTY OF 2-1-1 SAN DIEGO ©



Community
Information
Exchange

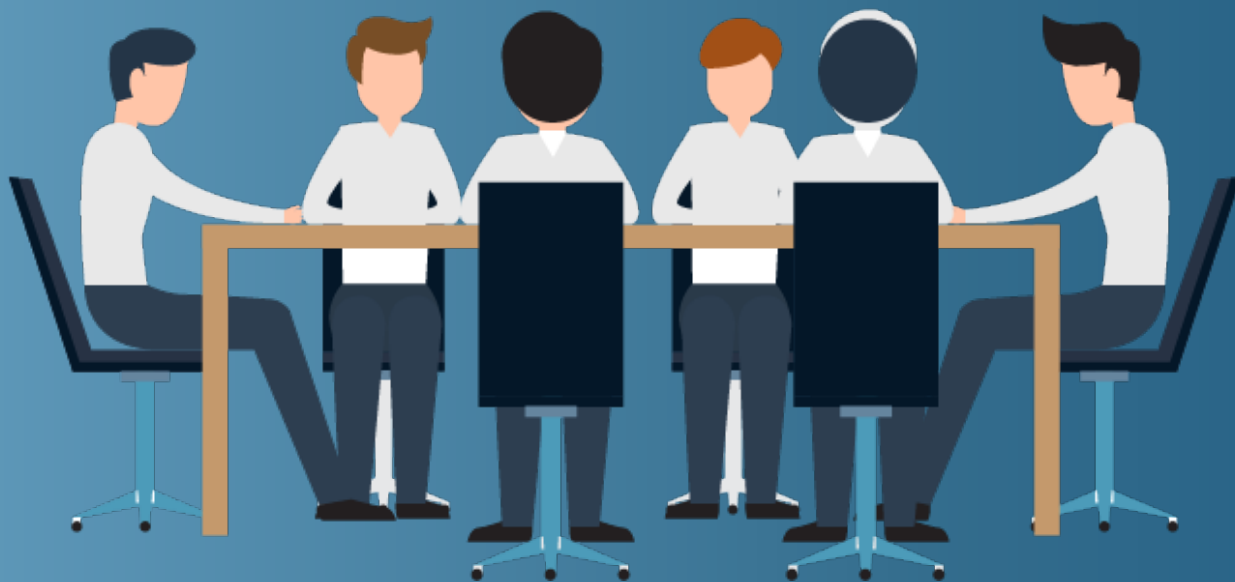


Define Roles for Health and Non-Health Partners

Profile	User License	Role	Type	HIPAA/ PHI Access	Account: Person Account	Contact	Assessment	Domain	Intakes & Forms	Actions	Tasks	Referrals	Surveys	Barrier & Unmet Needs	Agreements	Relationships	Care Teams	Program Enrollments	SMS	Alerts	Account: Agency	Services	Taxonomies	Serv
211 Agent	Salesforce	Agents	Internal 211	E/NV	E/V	NE/V	E/V	NE/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	NE/NV	NE/V	NE/V	NE/V	NE/V
211 Navigator	Salesforce	Agents	Internal 211	E/V	E/V	NE/V	E/V	NE/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	NE/V	NE/V	NE/V	NE/V	NE/V
211 Admin	Salesforce	System Admin	Internal 211	E/V	E/V	E/V	E/V	NE/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	NE/V	E/V	E/V	E/V	E/V
211 R&D	Salesforce	Operations	Internal 211	NE/NV	E/V	E/V	NE/V	NE/V	NE/V	E/V	E/V	E/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	E/V	E/V	E/V	E/V
FACT Agent	Salesforce	FACT Agent	Internal FACT	NE/NV	E/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V	NE/V
211 Tier 1 Partner	Customer Community Login	n/a	External Partner	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/V	NE/V	NE/NV	NE/NV
211 Tier 2 Referral Manager	Customer Community Plus	under Operations	External Partner	NE/NV	NE/V	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/V	NE/V	NE/NV	NE/V	NE/V	NE/V	NE/V	NE/NV
211 Tier 2 Care Coordinator	Customer Community Plus Login	under Operations	External Partner	NE/NV	NE/V	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/NV	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/V	NE/V	NE/NV	NE/V	NE/V	NE/V	NE/V	NE/NV
211 Tier 3 Referral Manager	Customer Community Plus	under Operations	External Partner	E/NV	NE/V	NE/V	NE/V	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/V	NE/V	NE/NV	NE/V	NE/V	NE/V	NE/V	NE/NV
211 Tier 3 Care Coordinator	Customer Community Plus Login	under Operations	External Partner	E/NV	NE/V	NE/V	NE/V	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/V	NE/V	NE/NV	NE/V	NE/V	NE/V	NE/V	NE/NV
211 Tier 3 Referral Manager	Customer Community Plus	under Operations	External Partner	E/V	NE/V	NE/V	NE/V	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/V	NE/V	NE/NV	NE/V	NE/V	NE/V	NE/V	NE/NV
211 Tier 3 Care Coordinator	Customer Community Plus Login	under Operations	External Partner	E/V	NE/V	NE/V	NE/V	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/NV	NE/NV	NE/NV	NE/V	NE/V	NE/V	NE/NV	NE/V	NE/V	NE/V	NE/V	NE/NV
System Administrator	Salesforce	System Admin	Informatica	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V
System Administrator	Salesforce	System Admin	Internal 211	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V	E/V



Adopt Interoperable and Scalable Technology



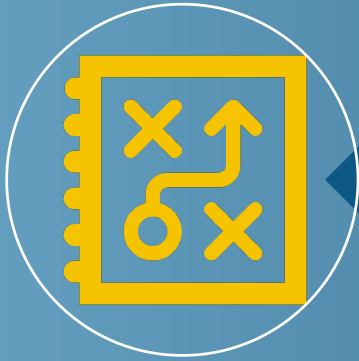


Action Checklist

1. Analyze Data Systems and Information Sharing Environment
2. Establish a Dedicated Multidisciplinary Design/Technology Team
3. Set Needs for Technology
4. Select Technology that Supports Interoperability and Shared Record



1. Analyze Data Systems and Information Sharing Environment



Create a Community Data Asset Map



Infrastructure/Systems

- HMIS (Homeless Management Information System)
- Health Information Exchange (HIE)
- ConnectWell (HHSA)
- Emergency Medical Services across cities
- Food Bank
- Career/Workforce (WIOA funds)
- School Systems

Platforms

- ETO/Social Solutions
- Salesforce
- Electronic Medical Record
 - EPIC, CERNER, NextGen, OCHIN
- CC3
- Service Point
- Excel
- Clarity
- Oasis
- WATER
- ACCESS
- CommunityOS
- CalJobs
- STAR
- FileMaker
- CSTAR
- Trilogy





2. Establish a Dedicated Multidisciplinary Design / Technology Team



Identify Primary Sectors of Influence



Ensure Oversight of the Technology Requirements



Create Community Ownership



Continuously Explore Opportunities for New Functionality

Identify Primary Sectors of Influence



Person-Centered Care



Technology



Data Analytics



Public Health Informatics



Project Management

Multidisciplinary Team

Ensure Oversight of the Technology Requirements



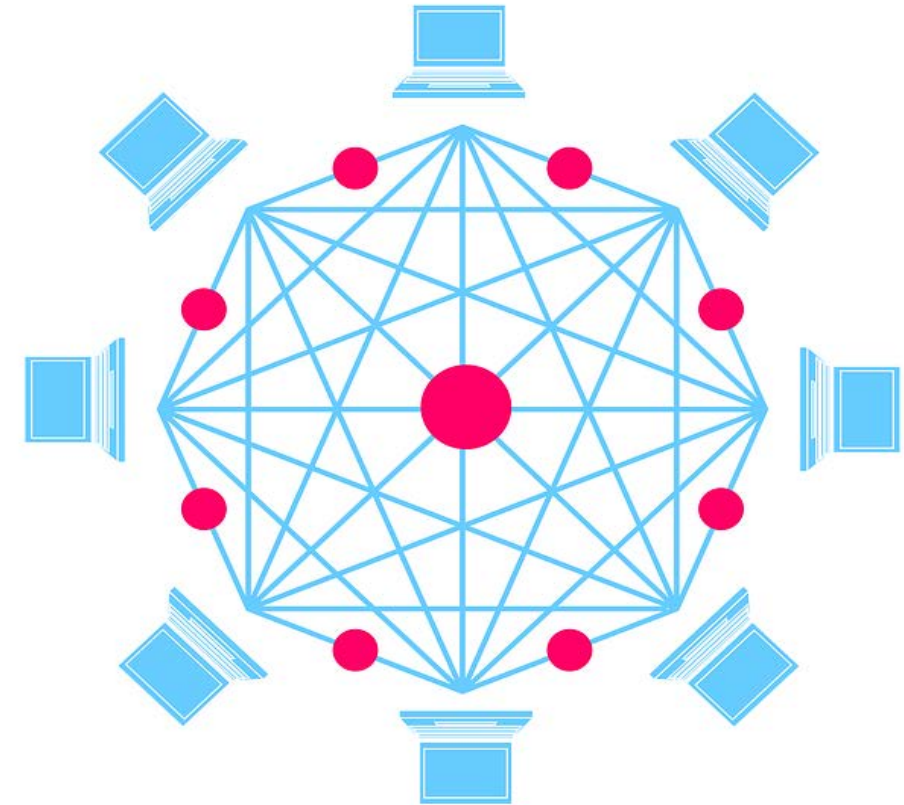
Create Community Ownership

- Engage end users from community partner organizations in the design and testing phases of development
- **Build shared buy-in and ownership** of the system and ensure that the platform will meet the needs of end users.



Continuously Explore Opportunities for New Functionality

- Identify situations where real-time upstream alerts could improve care coordination
- Explore opportunities to integrate data from prevention efforts
- Monitor trends in using **blockchain technology** for service coordination applications





Technology Platform Design

During 2-1-1 San Diego's the three-month design phase, the team invited potential users to attend multiple sessions to test and provide feedback on the system.



Executive Sponsor



Product Owner



Project Manager



Call Center Service
Subject Matter Expert



Community Subject
Matter Experts



IT / System Subject
Matter Experts



Salesforce
Administrator



Architect / Developer



3. Set Needs for Technology



Identify Current and
Future Technology Needs



Prioritize Needs and
Compare Technology
Vendors

Prioritize Needs and Compare Technology Vendors

Evaluation Criteria	Requirements	Maximum Possible Score	Reviewer Score
Qualifications and Expertise	<ul style="list-style-type: none">• Organizational experience as it relates to the scope of this project• Depth and relevance of staff technical expertise and experience• Adequacy of staff to perform work	20	
Costs	<ul style="list-style-type: none">• Reasonableness of costs	20	
Record of Past Performance	<ul style="list-style-type: none">• Relevant work examples• Client testimonials and references• Demonstrated ability to complete work tasks within project timelines and project budgets	10	
Merit of Proposal	<ul style="list-style-type: none">• Thoroughness, clarity, and approach of Proposal• Extent to which the proposed solutions meet the scope and needs of this project• Demonstrated understanding of project and requirements	10	
Interview Questions	<ul style="list-style-type: none">• Appropriateness and quality of responses to questions• Demonstrated unique or exceptional knowledge of the work required	40	
	TOTAL	100	



4. Select Technology that Supports Interoperability and a Shared Record



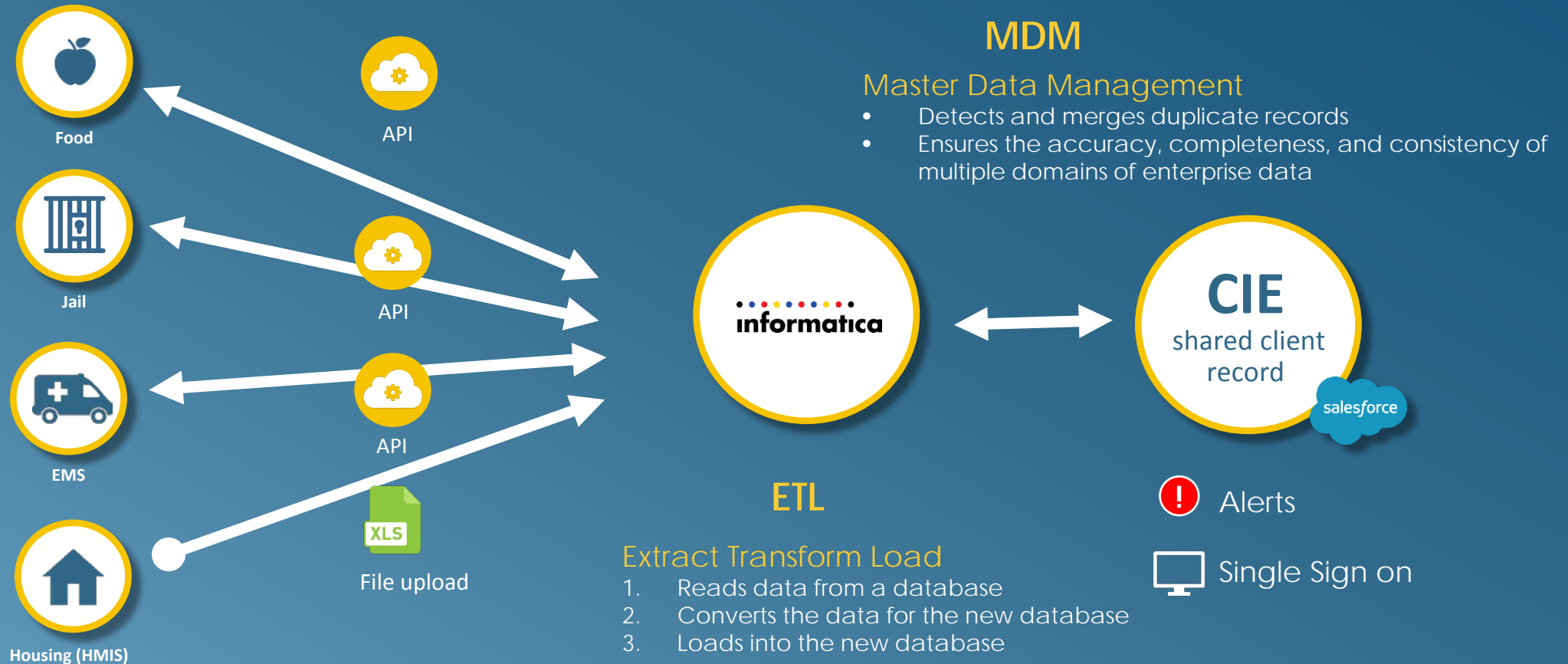
Assess
Functionality



Facilitate Data
Integration



Selecting a Technology Platform



Shared Client Record

?

Reports

SADIE TEST23

Details

Nutrition

Client

View

Account Name

SADIE TEST23

Age

28

Email

andrew.barnhart@...

Social Security Number

123456789

Monthly Income Amount

2,500.00

Phone

(770) 402-5192

Percent Of FPL

144.37%

Military Service Status

Data not captured

Birthdate

1/17/1990

Gender Identity

Man

Health Insurance Type

Military (TRICARE)

Employment Status

Data not captured

Highest Level Of School Completed

Data not captured

Last Assessment

9/14/2018 4:00 PM

Account Owner

211-Nav Test [Change]

Domain

Domain

Nutrition

Assessment

Action

More

Prescreen Completed: Not likely eligible because:

Not Applicable

Declined Prescreening

☐

If selected, skip rest of form and click next

Language

Data not captured

Including yourself, how many people live in your household that you purchase and prepare meals with regularly?

3

What is your household's gross income in the last 30 days?

2,500

Does your household have any more than \$100 in resources?

Data not captured

Includes money in checking/savings/credit union accounts and any cash on hand

Domains

Nutrition (Thriving)

Last Assessment: 9/14/2018 4:00 PM

Actions: 11 Referrals: 12

Transportation (Critical)

Last Assessment: 9/13/2018 11:37 AM

Actions: 3 Referrals: 2

Primary Care (Vulnerable)

Last Assessment: 9/12/2018 4:18 PM

Actions: 1 Referrals: 0

Housing (Thriving)

Last Assessment: 8/14/2018 3:05 PM

Actions: 13 Referrals: 9

Utility (Thriving)

Last Assessment: 9/5/2017 9:22 AM

Actions: 5 Referrals: 5

Social/Community Connection (Critical)

Last Assessment: 8/17/2018 12:15 PM

Actions: 4 Referrals: 7

Health Management (Thriving)

Last Assessment: 8/16/2018 3:28 PM

Actions: 5 Referrals: 3



CIE Technical Specifications

Design and
Technology
Planning Team

Planning
Requirements

System
Requirements

Security and
Privacy

Reporting

Additional
Functionality



System Requirements

User Types and
Log-Ins

Uniform Data
Standards

Longitudinal
Record

Bi-Directional
Closed-Loop
Electronic
Referrals

Care Team
Management

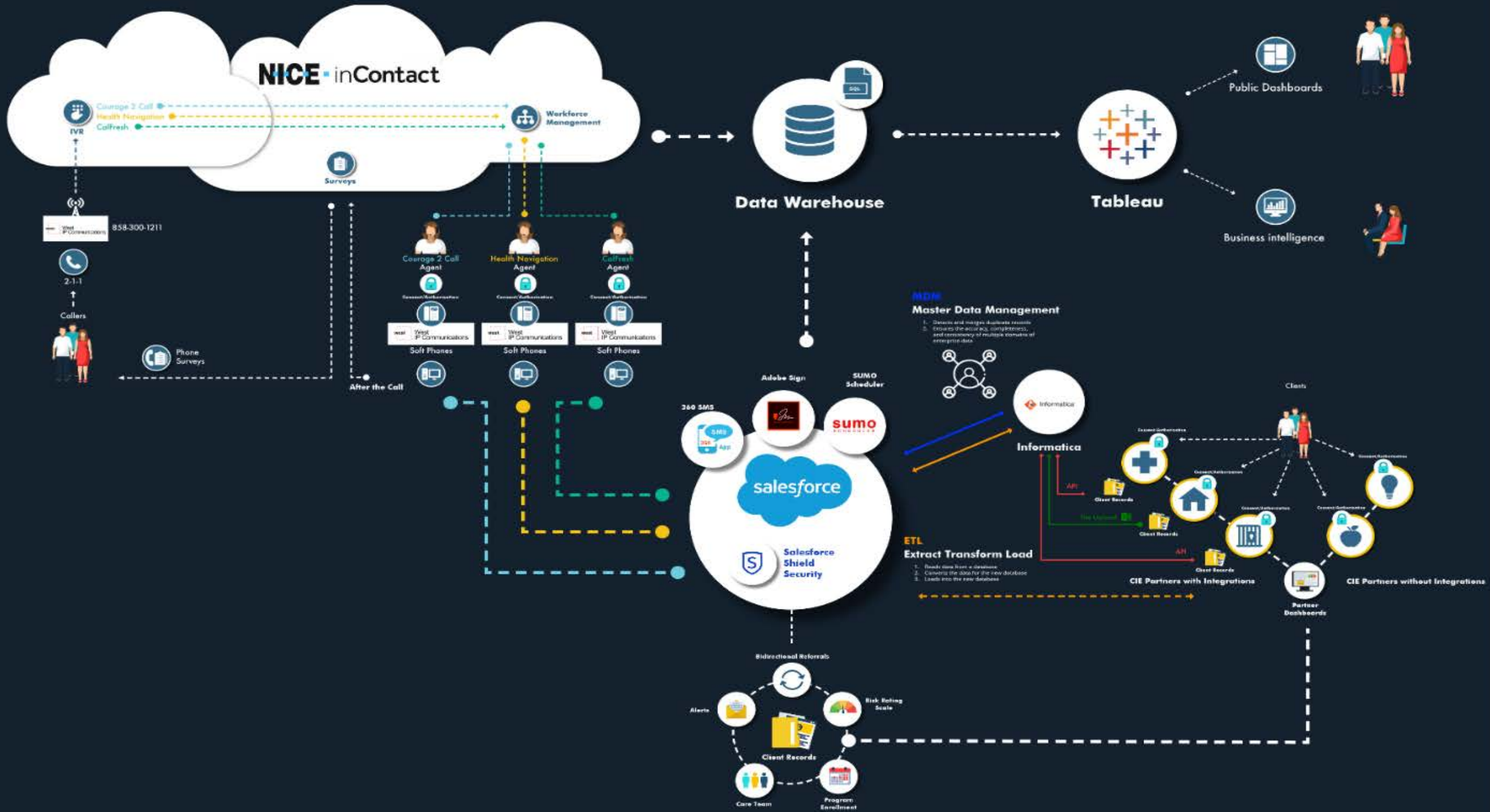
Push
Communication
Tools

Interoperability

Open Source

Security and
Privacy

Reporting



CIE Technology Platform



Find in Explorer...

SCREEN INPUT FIELDS

Additional_Infor...
Additonal_Infor...
Declined_Presc...
Household_Siz...
Text_message_...
Total_Gross_M...

SCREEN CHOICE FIELDS

Calfresh_Queu...
Calfresh_Queu...
CF_Language
CountyScreen
Does_your_hou...
Prescreen_Com...

CHOICES

Cantonese
Data_not_captu...

Description

Properties Usage

Label: Prescreen Next Steps-
Must Make a Selection
on the CalFresh
Prescreen

Unique Name: Calfresh_Queue_Assign
ment

Record Lookup
Query Contact

Screen
Screen1

Record Lookup
Nutrition
Domain Look...

Record Lookup
Lookup
Domain Action

Decision
Calculate
Income

Screen
Eligible Screen

Assignment
Likely Eligible

Assignment
Set Last Page

Decision
Nutrition
Prescreen Ac...

Screen
Not Eligible
Screen

Decision
Re-Assign to
Queue

Assignment
Not Likely
Eligible

Assignment
Set Last Page

Decision
Nutrition
Prescreen Ac...

Decision
Queue

Record Lookup
lookupAssigne
eSetting

Decision
Nutrition
Prescreen Ac...

Decision
Under 150 In
resources

Record Create
Create Domain
Action

Record Create
Create Cal
Prescreen Ta...

Record Create
Create
Screening

Record Update
UpdateAction

Record Create
Create Domain
Action

Record Create
Create Cal
Prescreen Ta...

Record Create
Create
Screening

Record Update
UpdateAction

Record Lookup
LookupService

Establish Standard Security and Privacy Measures

- Standardize technical requirements
- Provide ongoing privacy monitoring



Security & Breach Notification Guidance for
Community Information Exchange Partner Network:
2018

2-1-1 is excited to work with you to better the lives of residents in our community. 2-1-1 extends that commitment to the community by protecting the privacy and security of individuals' information. This provides guidance for Partner Agencies on software and hardware and to know how to identify a potential breach, investigate that breach and notify appropriate agencies.

Software and Hardware:

Software:

1. In order to use the Salesforce CRM, the following link provides a list of supported browsers: https://help.salesforce.com/articleView?id=salesforce_browser_overview.htm&type=Q
2. All points of entry to the system should be supported and updated to Operating System Manufacturer specifications.
3. Anti-Virus software is installed and current.
4. 2-1-1 strongly recommends the use of encryption when data is stored or transmitted over the internet.
5. Each user must have their own log-in to the software (Salesforce) and all passwords must be protected. Sharing log in information is strictly forbidden.

Hardware:

6. Accessing the Salesforce CRM must be on a private network connection
7. Hardware that is accessing Salesforce CRM must have password protection and auto-locking capabilities and passwords may not be shared.

Breach Notification:

In the event of any suspected breach of information, please notify privacy@211sandiego.org immediately. If you believe you are the victim of cyber crime, you may also notify the authorities by dialing 9-1-1 or at www.critchteam.org. The following guidance is designed to help you in determining what to do if you suspect a breach impacting 2-1-1 information.

In addition to this guidance, you are responsible for understanding your legal requirements for reporting directly to state and federal agencies if any exist.

Definition of a Breach

- 1) Reasonable belief that unencrypted personal information was acquired, or reasonably believed to have been acquired, by an unauthorized person; or in the case of encrypted personal information, it is reasonably believed that the encryption key or security credential was acquired by an unauthorized person and could render the healthcare or personal information readable.
- 2) A breach is, generally, an impermissible use or disclosure that compromises the security or privacy of the protected health information under the Privacy Rule or of personally identifiable information under California's Information Practices Act. An impermissible use or disclosure of protected health information or personally identifiable information is presumed to be a breach unless the agency that maintains or transmits computerized data, demonstrates that there is a low probability that the protected health information or personally identifiable information has been compromised based on a risk assessment.

Security Guidance for Community Information Exchange

Instructions for Sections 4 to 8:

Use "✓" in appropriate column.

Responders are encouraged to record the governing procedure name/number, revision and/or date along with objective evidence of compliance. To the extent possible, Responders are encouraged to reference and attach supporting response documentation.

4. QUALITY MANAGEMENT SYSTEM

QUESTION	YES	NO	N/A	SUPPORTING DETAIL*
Does an independent Quality structure exist for quality control and assurance (Independent of Product Development and Support)?				
Does the organization operate in accordance with formal procedures? If yes, are they written and approved by management?				
Does documented evidence exist to demonstrate compliance with procedures?				
Does the Quality unit conduct audits of vendors or suppliers?				
If yes, do formal, written procedures exist for the process?				
Are regular IT audits performed?				
Explain the scheduling procedure for internal audits or other methods of compliance checks.				

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Partner IT Privacy and Security Questionnaire



Community
Information
Exchange



Q&A

CIE Toolkit In Depth

Webinar 4: CIE Toolkit In Depth: Prepare a Legally Compliant Framework & Adopt an Interoperable Technology

March 21, 2019

10:00 am – 11:30 am (Pacific)

Recording will be posted at www.ciesandiego.org/events



Next Time

CIE Toolkit In Depth: Cultivate Sustainability &
Evolve and Shape the Movement / CIE Summit
Overview

April 18, 2019

10:00 am – 11:30 am (Pacific)

Register today at www.ciesandiego.org/events



The 2nd Annual Community Information Exchange Summit

Driving Cross-Sector Collaboration and Data Sharing to Create Healthier Communities

April 24 – 26, 2019

Marriott Marquis San Diego Marina

www.ciesandiego.org/ciesummit2019



Thank You!

Please provide your feedback!

Visit: <https://www.surveymonkey.com/r/CIWeb4>