



Administrative Regulations

Number AR8-32
Issue 1

Subject: Inter-Department Data Sharing

I. Purpose

The purpose of this Regulation is to establish policy and procedures for the implementation of a data sharing system amongst the twenty-four (24) Departments within the City of Long Beach (City) a single municipal corporation under the laws of the State of California.

II. Scope

This Regulation shall be applicable to all City departments which are directly responsible to the City Manager. In the interest of uniformity, effectiveness and completeness, it is requested that elective offices and other independent offices, commissions, boards, and departments also comply with this Regulation.

III. Amendment

The City Manager may amend the procedures and content set forth in this Regulation as required.

IV. Policy

The City is a single municipal corporation that is made up of twenty-four [24] departments. There is a long history of sharing data and information across departments to better service clients and the public. This Regulation confirms that the City is a single legal entity. As such, City departments may share individually identifiable, protected health, and criminal justice information. This document serves to confirm the City's status for all City departments. All data sharing must comply with all relevant federal, state, and local privacy and protective laws including, but not limited to, California Codes such as Welfare and Institutions Code and Civil Code, Family Educational Rights & Privacy Act ("FERPA"), Health Insurance Portability & Accountability Act ("HIPAA") and Title 42 of the Code of Federal Regulations ("CFR")-Public Health. Data sharing must be done using all

appropriate protective practices, such as encryption procedures and de-identification for the purposes of research. The intent of this Regulation is to better understand individual and aggregate client needs to better align and coordinate services, and better understand the full costs and success rates, for the City as a whole, of servicing individuals and specific populations, including super-utilizers of the criminal justice and health systems. Super-utilizers are individuals who use the justice and health systems frequently.

V. Data Sharing Procedures

A. Defining Specific Populations

The City departments will work together to define specific populations of interest only to improve the success of supportive services and reducing costs for the City. These definitions will be published and can be developed by City departments individually or in collaboration. Each City department agrees that only information about the specific populations of interest defined by the City shall be maintained in an Integrated Data System (IDS).

B. Data to be Shared

For this Regulation, an IDS maintained by the City will be created to house data authorized by this Regulation. Only data that meets local, state, and federal privacy laws and guidelines will be captured in the IDS. Certain health, education, probation, and child welfare data will not be shared in compliance with the relevant privacy laws. A data dictionary of elements will be developed and maintained for this Regulation. Changes to this dictionary may be made through agreement by the IDS governing body as defined below, and only when consistent with the above-mentioned laws and guidelines.

C. Multi-Disciplinary Team (“MDT”) Guidelines

1. Information may only be entered in the IDS by, or disclosed to, City employees designated by the Director of each department.
2. Members of the MDT shall be drawn from the employees designated by each department. Before being granted access to the database, each user must complete a privacy training offered by the City.
3. Before being granted access to the database, and annually thereafter, each user must sign an acknowledgement that he or she understands the requirements for maintaining the confidentiality of data. These requirements include: protected health information as defined in HIPAA, unauthorized dissemination or use of certain data in the Database is a crime that could lead to civil and criminal penalties, the user must comply

with the requirements of state law that confidential information shared by the MDT not be disclosed to anyone other than members of the MDT, the user agrees to abide by the same privacy and confidentiality obligations as the City department initially disclosing the information, and the user agrees to maintain information and records in a manner that ensures the protection of privacy and confidentiality rights of the person who is the subject of the information.

4. Each City department shall establish a system by which unauthorized personnel cannot access the data contained in the system.
5. Each City department agrees to maintain information and records in a manner that ensures the protection of privacy and confidentiality rights of the person who is the subject of the information.

D. General Use of Data

1. The information in the database shall be kept confidential and shall be used solely for the prevention, identification, management, or treatment of a member of one of the specific populations identified by the City pursuant to the terms of this Regulation.
2. When an individual in need is identified by the criteria set forth above, an alert will be sent to a City department MDT member. The alert sent through an encrypted protocol will contain the following information: Name of client, the ID assigned to that person from the City department to which the alert is being sent, and potential severity determined by a priority set by an algorithm designed and published by the City departments who participate in this Regulation.
3. Upon receipt of such an alert, members of the MDT may share data with other City departments that have interacted with the individual solely for the prevention, identification, management or treatment of the individual. This information may be shared in person, over the phone, and in limited electronic means, including through secure emails. However, only the data as described in Section V(b) herein may be made accessible in the IDS.

E. Governance

1. Each City Department Director, or his/her designee, shall participate on a Steering Committee for the IDS.
2. The members of the Steering Committee shall meet on an ad hoc basis to resolve issues concerning the implementation of the IDS pursuant to the terms of this Regulation.

VI. Public Records Act Requests

- A. In the event of a request being made for records pursuant to the California Public Records Act, California Government Code § 6250 et seq., the information gathered pursuant to the provisions of this Regulation will be reviewed by each of the City departments to determine if the information they contributed to the IDS is exempt from disclosure pursuant to the relevant provisions of California Government Code §6254.

- B. The information and data gathered and shared in the IDS is not intended to be a "public record" or a "writing" as defined in Government Code §6252.

APPROVED:



CITY MANAGER



DATE