



# Allegheny County Data Warehouse

The Allegheny County Data Warehouse brings together and integrates client and service data from a wide variety of sources both internal and external to the County. It was created by consolidating publicly-funded human services data (e.g., behavioral health, child welfare, intellectual disability, homelessness and aging) and, over time, expanded to include data from other sources (see Appendix for a list of sources). The Data Warehouse was made possible with support from the Human Service Integration Fund, a flexible funding pool created by a coalition of local foundations for the purpose of supporting integration and innovation within DHS.

The Data Warehouse was designed primarily to improve services to clients, but also to improve the ability of workers to perform their jobs and to support management decision-making; it is also intended to be available as a community resource, making data and information publicly available whenever possible.

## HISTORY

The Allegheny County Data Warehouse was originally conceived as a way to develop a common client management technology system across the disparate programs that were consolidated into a single Department of Human Services (DHS) in 1997. However, a group of Carnegie Mellon University students studied the problem and concluded that a fully integrated system was not possible. Instead, they — along with the Chamber of Commerce and a number of private sector stakeholders — presented a different approach: a Data Warehouse to link client-level data across systems without requiring that those individual systems share a common technology.

In 2000, the local community foundation released a Request for Proposals, and, with \$2.8 million in pooled foundation funding, signed a contract on behalf of Allegheny County with Deloitte Consulting to build the initial Data Warehouse. The Data Warehouse was operational in 2001 and able to integrate client data across DHS's program areas; in 2003, the first external source of data (from the Pennsylvania Department of Human Services) was integrated. A description of the technology involved in integrating data is provided in the Appendix.

Development of the Data Warehouse was possible because of a unique confluence of factors: leadership, supportive political climate and trust. Leadership was evidenced by (1) the political will to invest resources in the technology infrastructure and analysts to do the work and (2) willingness to put the findings into practice. The local political climate was open to the changes required to support integration of human services in Allegheny County. And the success of the initiative was also due to the time and effort spent developing trust between DHS and its data partners. Additionally, creation of the Human Services Integration Fund represented an unprecedented display of support for the newly-integrated department and its integration and innovation efforts.

The cost of maintaining the Data Warehouse, including 28 analysts, seven data leads and technical support, is about \$6.5 million annually. This represents less than 1% of DHS's total budget, which is considered a worthwhile investment when taking into account all the ways in which it supports quality service delivery and more.

### **BUILDING PARTNERSHIPS TO INTEGRATE DATA**

Sharing data within DHS and with other County departments (e.g., Housing Authority, Jail, Probation Office, Health Department, Medical Examiner) was relatively simple, as each is an organizational component of Allegheny County government and operates subject to oversight by the County Executive. Therefore, no formal agreements were determined to be necessary to allow for data sharing. This is not to say that data-sharing among these entities occurs without governance. DHS implemented data governance practices that allow for interoperability and cross-agency sharing. For more information, see [Sharing of Client Information for Service Coordination](#).

Sharing data with non-Allegheny County government entities required more extensive data-sharing agreements. Establishing a Memorandum of Understanding (MOU) that outlines duties, responsibilities, compliance issues and safeguards requires careful negotiation, legal expertise and patience. The partnership with the Pittsburgh Public School district is a good example of what goes into such an agreement.

### Public School/DHS Data-Sharing Agreement

After years of negotiation, a significant milestone in the use of the Data Warehouse occurred in 2009, with the creation of a data-sharing agreement with the Pittsburgh Public School (PPS) district. Since then, similar agreements have been established with 20 local school districts and education entities including charter schools and the Allegheny Intermediate Unit,<sup>1</sup> allowing for service and system activities designed to improve educational and well-being outcomes for school-aged children involved in human services. DHS and PPS attorneys focused on issues of confidentiality inherent in sharing student and client data, including the issue of how to legally obtain consent to use student records. After thinking through various options, the attorneys found a solution in a 2008 FERPA amendment that permitted the release of personally identifiable student data without consent to organizations interested in conducting research to improve student achievement as long as these organizations had a signed MOU that outlined confidentiality parameters and data use protocols. By tying the use of the data to actionable research, these attorneys found an innovative way to draft a legal agreement that met all of the requirements of FERPA and HIPAA. The agreement provides the framework for integrating student data, including confidentiality provisions, the responsibilities of each party, the type of information that can be shared and the purposes for which it can be shared. A key provision authorizes the use of the data for conducting “action research,” which means that 1) DHS will use the data to prepare analytical reports related to students in the school district who receive services from DHS and 2) DHS and the school district will create, implement and evaluate strategies developed from these statistical analyses.

<sup>1</sup> Although MOUs have been established with 20 districts, as of April 2018 only six have developed the technical capacity to share their data.

More information about these data-sharing agreements and the resulting analyses and strategies can be found [here](#).

### USING INTEGRATED DATA

What makes the Allegheny County Data Warehouse unique? Unlike data warehouses that are developed for research purposes or “one-shot” analyses, Allegheny County’s Data Warehouse was designed to support integrated client service and decision-making. Its value is evident in the ways in which it has supported the development of a variety of analytic and decision-making tools that put the power of integrated data into the hands of staff and providers. But DHS didn’t stop at creating tools — it also developed ways to make information and analysis widely available in the form of datasets, publications and visualizations housed on [www.AlleghenyCountyAnalytics.us](http://www.AlleghenyCountyAnalytics.us).

The following table outlines the various analytic tools designed to support the use of integrated data. Each is described more fully in the section that follows.

### Analytic and Decision-Making Tools

TOOL	PURPOSE	AVAILABILITY
<a href="http://www.AlleghenyCountyAnalytics.us">www.AlleghenyCountyAnalytics.us</a>	Hosts data sets, publications and visualizations	Publicly available
QuickCount	Allows for queries about participation in a wide range of services from data integrated in the DHS Data Warehouse.	Publicly available
Client View	Information about individual clients and their service involvement	Authorized DHS users, provider agencies and clients
Allegheny Family Screening Tool (AFST)	Predictive model to support child welfare call screening decision-making	Child welfare call screening staff and supervisors
Outcomes Tool	Monitor the success of various programs/ services by assessing the performance of participants	DHS staff
Alerts	Notification about clients' key life events	DHS staff
Reports Portal	Location for viewing automated reports and dashboards	DHS staff
Dashboards	Visualizations that show demographic, service and utilization information of a service or system; data can be manipulated by users to provide a custom view	DHS staff



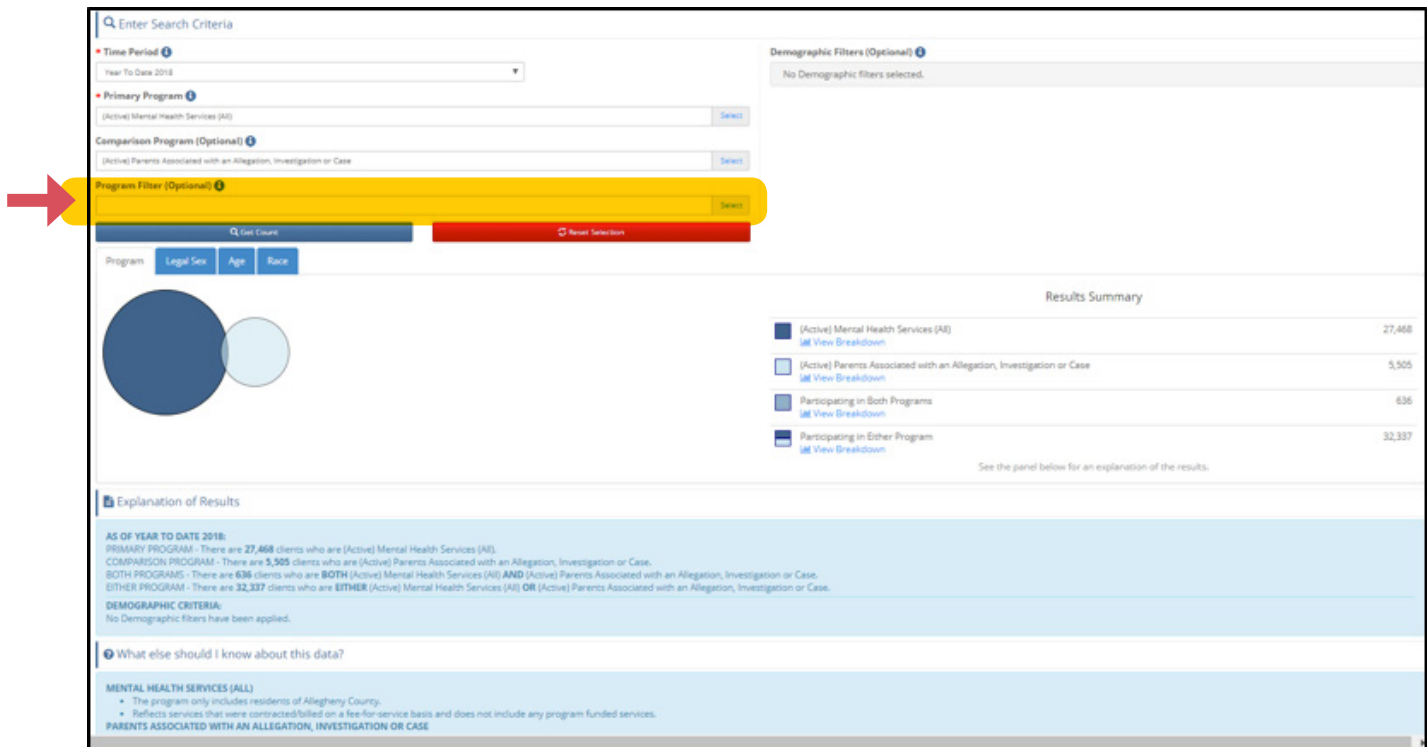
### QuickCount

[QuickCount](#) is a publicly-available resource that allows for queries about participation in a wide range of services from data integrated in the Data Warehouse. In addition to the ability to compare two programs, users can sort by time period, view participation in multiple services, and filter counts demographically and geographically. QuickCount provides data that helps community groups, providers, researchers and other stakeholders to understand the types and scope of services utilized and to use this information for service planning.

**QuickCount Search Screen** — as seen below, users select a **primary program (1)** and, if desired, a **comparison program (2)**. Users indicate a specific time period and may also select demographic and geographic filters from the **menu on the left (3)**.

The screenshot displays the QuickCount Analytic Tool interface. On the left, a sidebar contains a 'Filter Menu' (3) with options like Legal Sex, Age, Race, Municipality, Neighborhood, School District, Zip Code, PA State House District, PA State Senate District, PA Congressional District, Allegheny County Council, and Pittsburgh City Council. The main search area features a 'Time Period' (1) dropdown set to 'Year To Date 2018'. Below it, the 'Primary Program' (1) section shows a list of services under 'All Human Services' and 'Non-DHS Services'. The 'Comparison Program (Optional)' (2) section has a dropdown menu. At the bottom, there is a 'Program Filter (Optional)' dropdown, a 'Get Count' button, and a 'Reset Selection' button. A 'Demographic Filters (Optional)' section on the right indicates 'No Demographic filters selected.'

**QuickCount Search Results** — the screen below shows the number of clients active in mental health services compared to the number of parents associated with a child welfare allegation, investigation or case; it also shows the overlap between the two. Users may view these results by program as well as any of the **filters selected on the search screen** (sex, age, race, municipality, neighborhood, school district, zip code and governmental jurisdictions).



While [AlleghenyCountyAnalytics.us](http://AlleghenyCountyAnalytics.us) and [QuickCount](#) are publicly available, the following tools and dashboards — for privacy and confidentiality reasons — were designed for use only by staff and contracted provider agencies.



### Client View

*Client View* provides information about individual clients and their service involvement across all data sources in the Data Warehouse. Demographic information is also available, as well as service plans, assessments and electronic documents. Client View is available only to authorized users within DHS and contracted provider agencies, as well as to individual clients who are able to view their own service data.

**Client View Search Screen** — Users may search for a client by **name (1)** or **social security number (2)** or click on **advanced search (3)** to search by other criteria.

The screenshot shows the 'Client Search' interface of the Allegheny County ClientView system. At the top, there is a navigation bar with the 'CV' logo, 'Allegheny County ClientView' text, and links for 'New Search', 'Recent Clients', 'Follow Up List' (with a count of 0), and 'Other Resources'. A user profile for 'Sarah Thurston' is visible in the top right. The main heading is 'Client Search', followed by a note: 'Last Name or Social Security Number is required to search.' Below this, there are three primary search options, each highlighted with a yellow box and a red circle containing a number: 1. 'Last Name' (with a text input field), 2. 'Social Security Number' (with a text input field), and 3. 'Advanced Search' (with a 'Show' button). A 'Search' button is located below the 'Advanced Search' box. A yellow arrow points from the 'Advanced Search' box to a detailed 'Advanced Search' modal window on the right. This modal window includes a 'Hide' button, a note: 'If Last Name or SSN is unavailable, Street Address or MCI ID is required to search.', and several input fields: 'Street Address', 'City', 'Zip', 'State' (a dropdown menu), 'Date of Birth', 'Approximate Age' (a dropdown menu), and 'MCI ID'. A 'Search' button is at the bottom of the modal. In the bottom left corner of the main interface, there is an 'Announcements' section.

***Client View Demographics and Service Info Screen*** — the search provides demographic information about the client as well as a list of services in which the client is involved. Users may choose to see the **service timeline view (1)** or select from tabs that will show **documents (2)** related to the client, the client's **service plans and assessments (3)**, or a **listing of the client's workers (4)**.

38 years old, Female

☐ Add to Follow Up List

Demographics and Service Info

2

eDocuments

3

Service Plans and Assessments

4

Client's Workers

Basic Information

SOCIAL SECURITY NUMBER

Click here to view full SSN

DATE OF BIRTH

MCI ID

MA RECIPIENT NUMBER

STATE MCI NUMBER

Generate PIN

Address(es)

ADDRESS

MUNICIPALITY

14 records available

Search this Address

View 911 data

Contact

No Information Available

Other Info

RACE

Unable to Determine

ETHNICITY

No Data

MARITAL STATUS

No Data

LIVING ARRANGEMENT

No Selection

14 records available

1

Service Involvement

All Records

TimeLine View

First Service

Last Activity

Program Area

Filter by

Provider/SCU

Filter by

Service

Filter by

10/22/2003

Family Support Center

East Liberty Family Support Center

Talk with FSC Staff about Problems

10/23/2003

Family Support Center

East Liberty Family Support Center

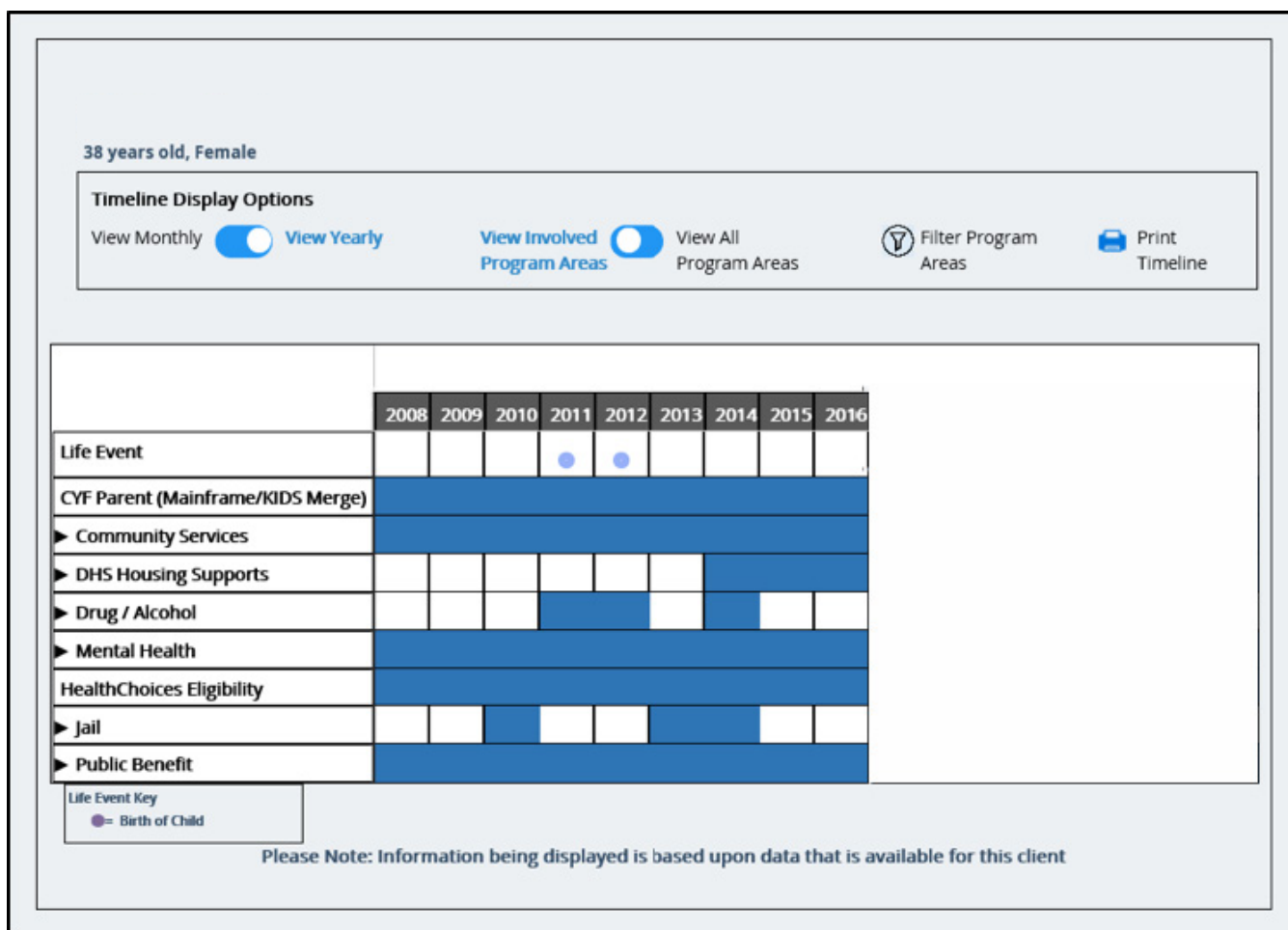
Legal Assistance

Export to Excel

Showing 1 to 10 of 100 entries



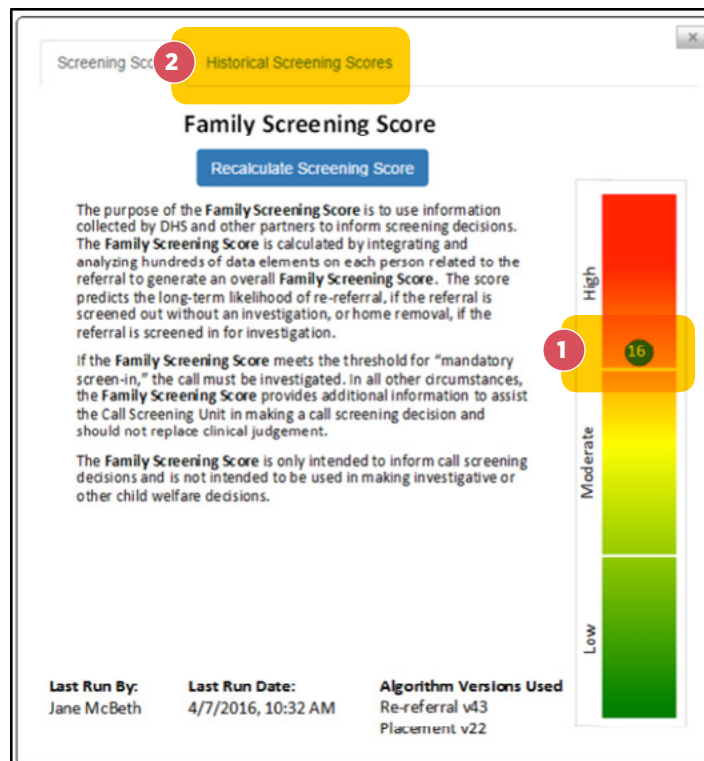
The **Client View Timeline Screen** provides a variety of viewing options. For example, the below screen provides a yearly view of life events (2 children born since 2008) and services in which the individual was involved.



### Allegheny Family Screening Tool

The Allegheny Family Screening Tool (AFST) is DHS's first predictive analytics tool and was designed to support child welfare call screening decisions. Implemented in 2016, the AFST calculates a score by integrating and analyzing hundreds of data elements; the score predicts the long-term likelihood of re-referral, if the referral is screened out without an investigation, or home removal, if the referral is screened in for investigation. The Family Screening Score is intended to provide additional information — in conjunction with clinical judgement — to assist child welfare workers in making a call screening decision. Read more about the AFST at [Developing Predictive Risk Models to Support Child Maltreatment Hotline Screening Decisions](#).

**AFST Score View displays the *risk score (1)*, locating it on the “thermometer” to indicate whether the risk is low, moderate or high. The user may also view *historical screening scores (2)* for a perspective over time.**





### Outcomes Tool

The Outcomes Tool is designed to help DHS staff monitor the outcomes of various programs or services. That information can be used to measure a program's success by assessing the performance of program participants. At the present time, the Outcomes Tool is operational in the criminal justice, education and child welfare systems.

#### Outcomes Tool Sign-in Screen

Outcomes Sign In

Username

Password

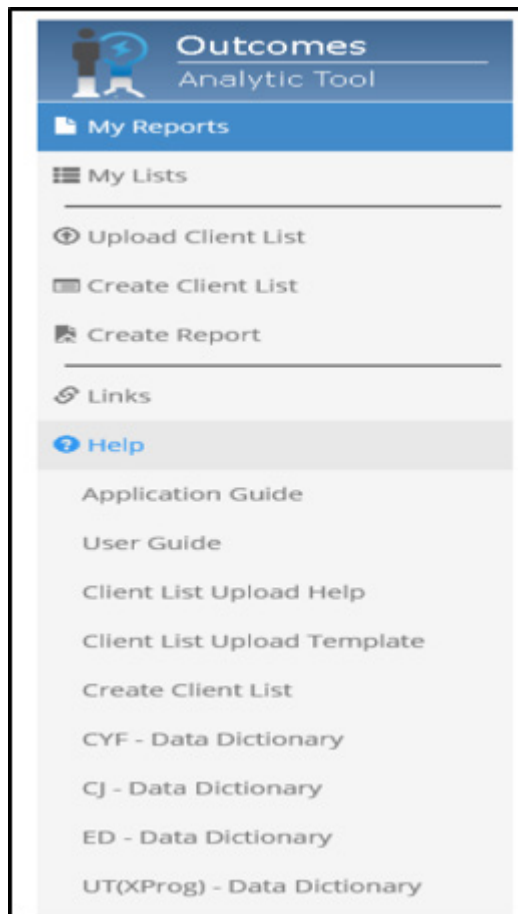
Required.

Sign In

Are you a new user? ( [Request Access](#) )

**Disclaimer:** You are about to enter the private network of Allegheny County. All information on this site is confidential. Access is limited to persons with user identification assigned by Allegheny County. Unauthorized access to this system or unauthorized use of the information contained therein is a violation of County, State and Federal Laws, and will be punished to the full extent of the law.

*The **Outcomes Tool Navigation Menu** allows a user to choose to view reports and lists that have already been created, create/upload client lists and create new reports. There are also guides, templates and data dictionaries to assist the user.*



**The Outcomes Tool My Reports Screen lists all of the user's existing reports and allows for *editing the name of the report, creating charts from the data and deleting the report.***

My Reports

Create Report Refresh

Show 10 entries Filter:

ID	Report	Report Info	Created	Delete On	Options
901	Name: Demo Group: Program Analysis (Utility Tool) Outcome: Cross Program Analysis Program Count: 12	SUCCEEDED: 02/19/2018 11:24 [Run] List: {1104} Demo #1 Records Comment: N/A	02/19/2018	03/10/2018 [30 Days]	[Edit] [Chart] [Delete]
841	Name: Demo 2 Group: Criminal Justice Outcome: Re-Incarceration	RUNNING: 03/08/2018 15:25 [Stop Report] List: {843} cjdoc #7573 Records Comment: N/A	01/05/2018	06/06/2018	[Edit]
837	Name: Demo 3 Group: Criminal Justice Outcome: Re-Booking	SUCCEEDED: 01/03/2018 15:55 [Run] List: {843} cjdoc #7573 Records Comment: N/A	01/03/2018	06/06/2018	[Edit] [Chart] [Delete]

Showing 1 to 3 of 3 entries Previous 1 Next

Below is an example of an **Outcomes Tool Report**, showing the percentage and number of clients involved in a specific program by gender and race. While this screen displays participation information, scrolling down will display additional metrics about program outcomes. By clicking on the orange buttons, users can **view the actual data and additional metrics or download the data into an Excel file.**



The **Outcomes Tool Create List Screen** allows the user to define the parameters of a new list and to use additional **custom filters** to select on multiple criteria. For example, a user may select a cohort of offenders in the Allegheny County Jail for a specific time period and then use custom filters to narrow down that list to members of the cohort who also had an episode of homelessness and an episode of mental health treatment within six months prior to their Jail stay.

**Outcomes Analytic Tool**

My Reports  
My Lists  
Upload Client List  
Create Client List  
Create Report  
Links  
Help

**Filter Menu**

- Legal Sex
- Age
- Race
- Municipality
- Neighborhood
- School District
- Zip Code
- PA State House District
- PA State Senate District
- PA Congressional District
- Allegheny County Council
- Pittsburgh City Council

**Create List**

List Type: Program Analysis (Active)

List Name:

Start Period: Feb 2017

End Period: Jan 2018

**Select Programs**

Select All | Clear Selection | Download

- All Human Services
  - DHS Services
    - Aging
    - CYF Child
    - CYF Parent (Mainframe/KIDS Merge)
    - Community Services
    - DIIS Housing Supports
    - Drug / Alcohol
    - Early Intervention
    - Independent Living
    - Intellectual Disabilities
    - Mental Health
  - Other Services
    - Assisted Housing
    - Courts
    - HealthChoices Eligibility
    - Jail
    - Medical Examiner
    - Public Benefit
    - Public Schools
    - Birth Certificates

**Demographic Filters (Optional)**

No Demographic filters selected.

**Spells (Optional)**

(At Least) (Type)

-- Select Spell -- Add

No Spells selected.

**-- Select --**

- Programs Currently Active
- Jail Bookings
- Jail Stays
- Drug and Alcohol Assessment
- Drug and Alcohol Inpatient Detoxification Service Spells
- Drug and Alcohol Inpatient Rehabilitation Service Spells
- Mental Health Crisis Services
- Mental Health Emergency Service Spells
- Mental Health Inpatient Service Spells
- Months Since Drug and Alcohol Substance Abuse Diagnosis
- Months Since Mental Health Diagnosis

Comment:

Create Reset

## Alerts

Recognizing that there are a number of key events in a family's life that may have an impact on the safety of the home environment, we designed an approach, leveraging the Data Warehouse, to alert DHS staff and providers when any one of these key events occurs. The alerts show up when a user logs into a case management or workflow management application; they may also be texted or emailed to the user. Examples of events that may trigger an alert are birth of a child, charges filed against a parent or client, and school truancy. Alerts are categorized as immediate, urgent, or informational and, whenever available, links are provided to documents that contain more information about the alert.

## Reports Portal

The reports portal provides one convenient location for viewing automated reports and dashboards in areas such as Basic Needs, Children and Families, Disabilities, Individual and Community Health, Older Adults, Safe Measures and Administration.

**Reports Portal Landing Page** — in the screen below, the user has selected **Child Welfare (2)** under **Children and Families (1)** and a report about **referrals by allegation (3)**.

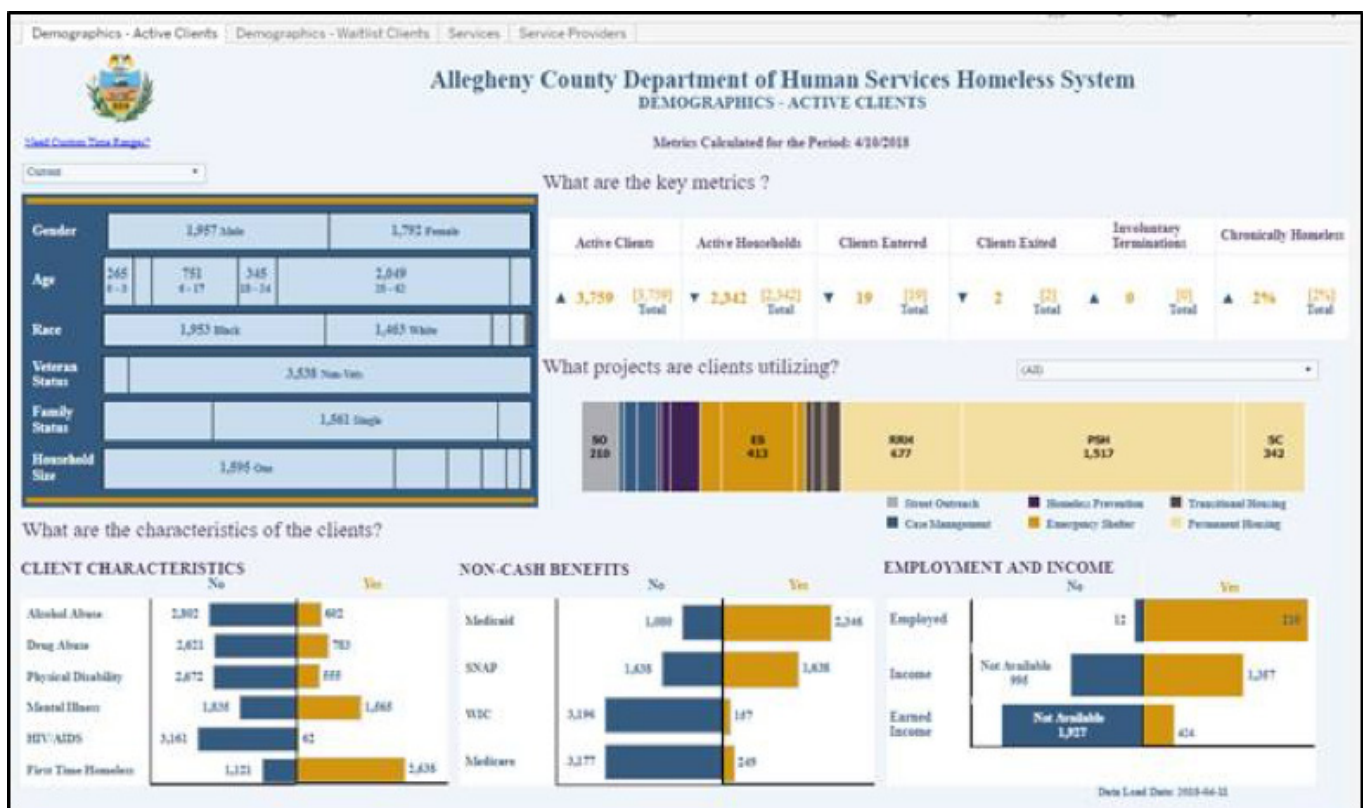




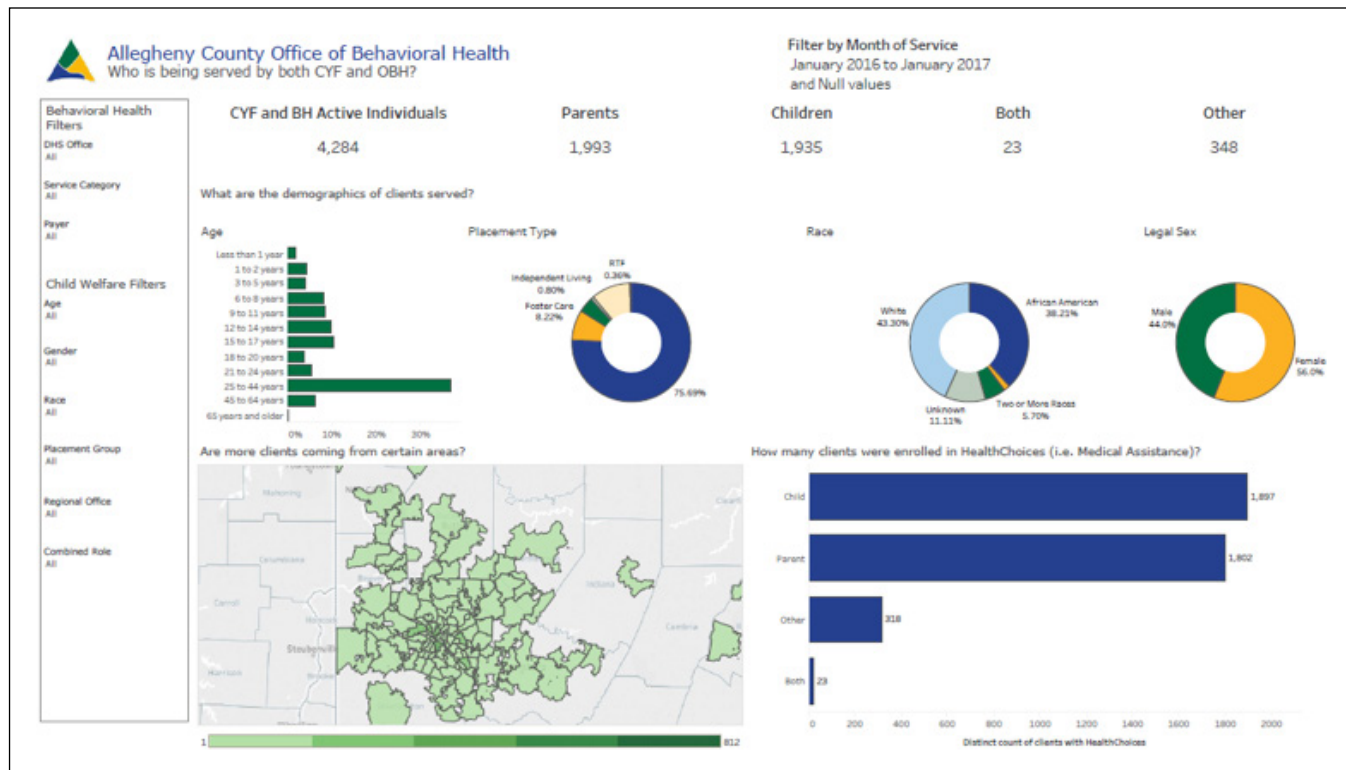
## Dashboards

More than 30 dashboards are available on the Reports Portal and on [AlleghenyCountyAnalytics.us](http://AlleghenyCountyAnalytics.us). Dashboards are designed to support internal and external planning and decision-making, and allow the viewer to view demographic, service and utilization information. Dashboards can be manipulated to specify client demographics, service/diagnosis, year and cost as well as comparisons and trends over time. Following are two examples of dashboards: Allegheny County Department of Human Services' Homeless System and Behavioral Health/Child Welfare.

**The Homeless System dashboard provides detailed information about one system. Users can view current or historical information about active clients, clients on the waiting list, services and/or service providers.**



*The **Behavioral Health/Child Welfare** dashboard provides integrated information about two systems: behavioral health and child welfare. It allows the user to see who is receiving services from both systems, by month/year, payer, service category and demographics.*



### WHAT'S NEXT?

We are building predictive risk models and interventions designed to prevent child abuse and neglect as well as models to triage calls for homeless services and to prevent homelessness. We are also pioneering the mining and use of unstructured administrative data to support case work and quality assurance and advancing “next generation” nudging projects.

### TO LEARN MORE ABOUT THE DATA WAREHOUSE

The DHS Data Warehouse has been studied extensively, written about in a number of publications and recognized for its innovation in information technology. A selection of articles that appeared in national publications, as well as a podcast and a DHS-presented paper about the Data Warehouse, are available below.

[Software for the Social Good: One County's Model Warehouse](#)

Government Technology, December 1, 2017

[How Allegheny County's Data Warehouse is improving human services through integrated data](#)

GovInnovator podcast, February 17, 2016

[Data Warehouses: Using New Technology to Improve Human Services Administration](#)

Re-issue of June 11 article below

Government Technology, June 12, 2014

[Allegheny County, Pennsylvania: Department of Human Services' Data Warehouse](#)

Data-Smart City Solutions, Harvard University, June 11, 2014

[Gaining Ground: A Guide to Facilitating Technology Innovation in Human Services](#)

Data-Smart City Solutions, Harvard University, May 28, 2014

[Allegheny County's Data Warehouse: Leveraging Data to Enhance Human Service Programs and Policies](#)

University of Pennsylvania, May 2014

[Human Services: Sustained and Coordinated Efforts Could Facilitate Data-Sharing While Protecting Privacy](#)

U.S. Government Accountability Office, February 2013.

## APPENDIX: DATA WAREHOUSE SOURCES

1. **Aging** — publicly-funded services and supports provided to individuals age 60 and above
2. **Substance Use** — publicly-funded services and supports designed to treat substance use disorders
3. **Mental Health** — publicly-funded services and supports for individuals with a mental health diagnosis
4. **Family Support Centers** — publicly-funded services provided to children (age 3 and under) and their families through any of Allegheny County's family support centers
5. **Homeless and Housing Supports** — individuals or families receiving housing and supportive services provided by DHS and DHS-contracted providers due to a housing crisis. Services include housing assistance, case management, prevention and outreach.
6. **Allegheny County Jail Collaborative** — data on services and supports for offenders, including the Reentry program, designed to prevent recidivism and improve community safety, developed through a partnership of County agencies, the Courts and community organizations
7. **Child Welfare** — children and youth 18 years old or younger, and their families, associated with a child welfare allegation, investigation, or case
8. **Public Housing** — low-income individuals receiving housing assistance through the Housing Authority of the City of Pittsburgh and the Allegheny County Housing Authority
9. **Allegheny County Jail** — individuals who are admitted to the Allegheny County Jail and assigned a jail bed.
10. **Public Schools** — children and youth enrolled in kindergarten through twelfth grade in one of the DHS data-sharing partner school districts:
  - a. Pittsburgh Public School District
  - b. Clairton City School District
  - c. Duquesne School District
  - d. Penn Hills School District
  - e. Woodland Hills School District
  - f. Propel Charter Schools
11. **Adult Probation** — data on cases, charges, sentences, violations and detainers for adults supervised by Allegheny County Adult Probation
12. **Birth records** — birth certificate records of births that occurred among mothers who resided in Allegheny County at the time of delivery
13. **Courts** — information on court cases — such as filings, charges, dispositions, and sentences — collected by Magisterial District Courts and the Court of Common Pleas in Allegheny County.

14. **Public Benefits** — individuals who have received services from Allegheny County DHS and who are also receiving public benefits from the Pennsylvania Department of Human Services (PA DHS). PA DHS public benefits include cash assistance, the Supplemental Nutrition Assistance Program (SNAP), help with childcare, health care coverage, home heating assistance (LIHEAP), school meals, Select Plan for Women, and long-term living services.
15. **Intellectual Disability** — publicly-funded services provided to individuals over the age of 18 with intellectual disabilities
16. **Early Childhood** — infants, toddlers and young children up to three years of age who are receiving Early Intervention (EI) services. EI provides developmental and social emotional screenings, supports and services for young children who have a developmental delay or are at risk for developmental delay.
17. **Juvenile Justice** — data on allegations, charges, disposition and placements, as well as assessments, for youth under the age of 18 who are supervised by Allegheny County Juvenile Probation
18. **Autopsied Deaths** — individuals who died in the County and whose deaths were recorded in autopsy reports by the Allegheny County Medical Examiner's Office. The Medical Examiner investigates cases of homicide, suicide, overdose, accidental deaths and natural deaths that are sudden, unexpected or medically unattended.
19. **Independent Living** — youth ages 14 to 24 who had at least 30 days of placement services with child welfare on or after their 14th birthday and are receiving publicly-funded services designed to prepare them for living independently as adults
20. **Labor and Industry** — employment, earnings and unemployment insurance benefits information
21. **Workforce Training Programs** — Partner4Work (formerly known as the 3 Rivers Workforce Investment Board) shares job search assistance, career counseling and vocational training data from Pennsylvania's Commonwealth Workforce Development System

## APPENDIX: INTEGRATING DATA

Each new data source added to the Data Warehouse involves a process that requires the development of trust and a shared vision as well as coordinating details such as the form in which data will be provided. Most partners send information weekly, and it is loaded into the Data Warehouse through an Extract, Transform and Load (ETL) Platform. The ETL is set up to accept data in different formats and load them into the central data area. At DHS, a team of programmers use IBM DataStage to create each ETL, and Oracle database management software to store it. Setting up the ETL is the most complex function involved; it accounts for about 80 percent of the technological work of the Data Warehouse.

Once client data are loaded into the Data Warehouse, each client is assigned a unique identifying number. In this way, all client-specific information can be pulled together to provide a comprehensive picture of client needs. It also ensures that individuals are not counted more than once.

The Data Warehouse requires ongoing data quality management. This is accomplished by an administrator who coordinates data, a support team that loads information, and an operational team that does weekly maintenance and performs data archiving.

### Data Warehouse Composition

CLIENT DEMOGRAPHICS	PROVIDER INFORMATION	SERVICE INFORMATION	FISCAL INFORMATION
<ul style="list-style-type: none"><li>• Name</li><li>• SSN</li><li>• Gender</li><li>• DOB</li><li>• Address</li><li>• Race</li><li>• Marital Status</li><li>• Education/Employment</li><li>• Living Arrangement</li></ul>	<ul style="list-style-type: none"><li>• Services and Specialized Services Offered</li><li>• Location of Services</li></ul>	<ul style="list-style-type: none"><li>• Service Type</li><li>• Service Location</li><li>• Clients Served</li></ul>	<ul style="list-style-type: none"><li>• Units of Service</li><li>• Cost of Services</li></ul>

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

**From:** Marc Cherna, Director, Department of Human Services

**Date:** January 27, 2015

**To:** Allegheny County Department of Human Services (DHS)-Contracted Service Providers

**Subject:** Sharing of Client Information for Service Coordination and Quality Improvement Activities

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For some time now, the Allegheny County Department of Human Services (DHS) has been a vocal proponent of data and information sharing to support the quality and coordination of services provided to Allegheny County residents. In pursuit of this goal, DHS undertook several initiatives during 2014 to make the information that DHS collects available to both service providers and clients.

This memo is designed to inform you of these initiatives, our efforts to better understand the regulations governing the sharing of client information, and how that understanding has informed the development of our approach to data sharing.

### **Background**

**As an oversight and coordination entity, DHS takes the care and confidentiality of its clients seriously.**

Thus, our goal is to achieve an appropriate and respectful balance that ensures quality care and services through collaboration and coordination, supported by appropriate use and sharing of client data. Under the federal Health Insurance Portability and Accountability Act (HIPAA), DHS is a covered component of Allegheny County, which means that we must comply with HIPAA's privacy and security rules with respect to any client information we receive.

As part of our due diligence concerning data confidentiality, DHS hired an independent expert, John Petrila, to examine how our use of data complies with federal and state laws on the privacy and security of individually identifiable health information. Mr. Petrila is an attorney, a professor and the Chair of the Department of Mental Health Law & Policy at the Florida Mental Health Institute, University of South Florida. With his assistance, we were able to develop a data-sharing approach that is in keeping with the letter and the spirit of the applicable laws.

### **Philosophy and Legal Approach**

- **DHS believes fundamentally that sharing protected information is critical to the provision of care.** The appropriate sharing of client information promotes good care, and is essential to the continuity and overall quality of care provided to DHS clients.

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MARC CHERNA, DIRECTOR  
DEPARTMENT OF HUMAN SERVICES  
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- **DHS defines itself as a covered component under the privacy rule and security rule of HIPAA.** DHS defines itself as a covered component for all program areas and business operations, requiring that all of those areas comply with the HIPAA privacy and security regulations. Similarly, all providers are required to comply with HIPAA regulations (and other applicable state and federal regulations) either directly or under the terms of their contract as a DHS-contracted provider of services.
- **DHS has a right to clients' protected information in its role as contracting entity.** By virtue of its role as a government service coordination and oversight entity – one that contracts and pays for services and must ensure the quality, coordination, and continuity of those services – DHS has a right to request and receive protected data about the clients served by contracted service providers. This includes (as relevant to the contracted service) information about a client's physical health, mental health, and substance abuse treatment.
- **As a government service coordination and oversight entity, DHS may re-disclose protected information for the purposes of treatment and treatment coordination.** Both the Pennsylvania Mental Health (MH) Procedures Act and HIPAA allow for the unconsented release of protected client information for purposes of treatment and treatment coordination (state and federal substance abuse laws are excluded in this discussion about sharing for treatment purposes).
- **It is not always feasible to obtain consent for re-disclosure of client information in a way that facilitates expedient treatment and coordination of care.** Although DHS supports and prefers obtaining direct client consent for the sharing of protected client information for these purposes, when possible, obtaining timely direct consent is not always reasonable and may create a barrier to DHS's standards for quality client care and service coordination. Neither HIPAA nor the MH Procedures Act requires consent for the sharing of information for treatment purposes. However, both permit the practice, so consents may be used. DHS encourages as a minimum standard the use of Privacy Notices as a mechanism for contracted providers to inform clients about the ways in which their information may be shared for the purposes of treatment.
- **DHS interprets the law to mean that DHS is responsible for maintaining the privacy and confidentiality of protected client information once the data is entered, transmitted or otherwise stored in our system.** The service provider maintains responsibility for the security and confidentiality of any paper or electronic data stored or retained in their files and information systems, as well as protecting from misuse any DHS system logins and security access privileges granted to them. However, the provider is not liable for any subsequent sharing or use of the data by DHS, once the data is in DHS's possession.

We believe that the above-described approach promotes quality client care while respecting each client's privacy and confidentiality; we further believe that this approach complies with the legal requirements of federal and state laws. It is important to note that these laws were not designed to prohibit appropriate sharing of data. In fact, they recognize the crucial role that appropriate sharing of information plays in providing quality care. HIPAA specifically authorizes the release of protected health



information (PHI) without consent, for the purposes of treatment, payment and operations. This authorization takes into account the reality that an attempt to obtain a separate, individual consent for each of these purposes is a barrier to providing effective care.

The MH Procedures Act also allows for the sharing of protected information in the interest of providing clients with the best care possible. The section of the act regarding the nonconsensual release of client information (55 Pa. Code § 5100.32) specifically authorizes the release of information “to those actively involved in treating the individual.” Furthermore, protected client information may be shared with “the administrator” under this section. In Pennsylvania, administrator duties are shared between the PA Department of Human Services (formerly the Department of Public Welfare) at the Commonwealth level and the agency responsible for mental health services in each county.

**Psychotherapy notes are excluded from this discussion.** Such information is outside the scope of what DHS needs to ensure the effective provision, coordination and continuity of quality care, and neither HIPAA nor the MH Procedures Act authorizes the sharing of these notes.

### **Client View and the Data Warehouse**

In keeping with the philosophy and legal approach explained above, and as part of DHS’s ongoing effort to improve care for Allegheny County residents by supporting the collection and provision of a more comprehensive human service client record, Allegheny County has begun developing a secure, externally-accessible tool, Client View, to give contracted providers access to client data available in the DHS Data Warehouse.

This **Data Warehouse**, created and maintained by DHS, contains person-specific information from internal and external data sources. The Data Warehouse provides information regarding the service activity of any of these individuals across the multiple programmatic service areas administered by DHS (e.g., child welfare, mental health, drug and alcohol, homelessness, aging, intellectual disability and other community services) as well as additional individual client-level information provided to DHS by external sources (e.g., Public Housing Authorities, the Pennsylvania Department of Human Services and the Allegheny County Jail).

**Client View** will allow users to view data in the Data Warehouse on a client-by-client basis for those individuals whom they currently serve. Users can search by client demographics such as first name, last name, social security number, date of birth, Master Client Index ID, and address. The application will be able to retrieve basic demographic information, service coordination and services rendered activity, child welfare and juvenile probation out-of-home placement information, services plans, and assessments.

This capability was developed, in part, to address feedback from participating providers who indicated that this kind of information, which was not always readily available to them, would greatly improve their ability to serve clients if made available. Of course, access to some information (e.g., drug and alcohol data) must be limited, but DHS believes that most information can be shared and that appropriate sharing of that information is the core intent of laws such as HIPAA.

**DHS also believes that clients should be able to view and access their own personal information collected by DHS**, so in the third phase of Client View development, we will create a client accessible portal. Through this portal, clients and select family members will be able to view their own service information and use it for their own self-directed case management.

## **Conclusion**

DHS takes its role as a government coordination and oversight agency seriously. Requesting and receiving information about the clients served by contracted providers is a critical part of our mission. It is not only our right, but our responsibility, to collect protected client information for this purpose, and to share it in ways that support quality, transparency, and coordination of care.

We are readily available to address any specific questions about this document or the described data requests. Thank you for your ongoing cooperation and commitment to providing excellent human services to the residents of Allegheny County.