

Colorado Children and Youth Information Sharing (CCYIS)

Educational Stability Summit

April 10, 2015





CCYIS Establishment

- Created from a need for information sharing out of two state initiatives in 2007:
 - Collaborative Management Program (CMP or HB 1451)
 - Prevention Leadership Council (PLC)
- Prioritized through the MOU process for CMP and PLC executed by Executive Directors of CDHS, CDPHE, CDPS, CDE, HCPF as well as the CO State Court Administrator



Colorado Children and Youth Information Sharing (CCYIS)

- Multi-agency effort to improve information sharing (IS) across systems that serve children, youth and families
 - Included families as key members of CCYIS
- Status:
 - Several state and federal grants supported CCYIS work



CCYIS Vision And Mission

- **Vision:**

Children, youth and families experience seamless and collaborative services and supports that are responsive to their interests and needs. This is facilitated by information sharing that safeguards their privacy at both the state and local level.

- **Mission Statement:**

To develop strategies for sharing information to optimize services available and delivered to children, youth and families in Colorado.



CCYIS – Major Goals

- Establish a foundation of an effective, cross-discipline collaborative governing body to improve information sharing for children and youth in Colorado.
- Manage a comprehensive assessment of data, legal authority, technology and related policies of participating agencies.
- Develop children and youth information sharing strategic plan.
- Develop cross-system protocols and explore technological solutions for information sharing.



CCYIS and Families

Since it began, the CCYIS was committed to including a family member, a family-driven organization, community and youth representatives as part of the process to develop effective information sharing practices.



Began with Focus Groups

- Conducted over 10 focus groups across the state
- Central themes:
 - Need for common consent forms
 - Need for adequate privacy protocols
 - Need for information sharing memorandums of understanding among local community agencies
 - Need for policies and procedures regarding information sharing



Focus groups with families and youth findings

- Ask for clinical and relevant information
 - “(It) kind of feels like half the state wants to know your business”
- Assure security of the information
 - Am I agreeing to share information that could be harmful to my family?
- Involve the clients as much as possible
 - Involve them early on and at every opportunity
- Provide explanations
 - With whom will information be shared?



Myths and Other Issues

- You can share any information, at any time with anyone *within* your organization
- Sharing information is dependent upon **who** you know
- You always need **consent** to share
- Security and privacy are the same thing
- HIPAA is a barrier to cross agency information sharing
- Agencies that work together and that already have our information 'already share it' –
- If it's FERPA related – you cannot share it!





Conducted Consent Form Analysis

- Collected over 45 consent forms from the CCYIS membership
- Agencies brought in multiple forms used by divisions and departments
- Privacy and Security SME and NJISI project team conducted a review and analysis:
 - Data collected
 - Purpose for the form (mental health, substance abuse, common informed consent)
 - Documented age of form and disclosures provided to recipient
 - Signatures required – disclaimers provided by agencies/organizations



Privacy and Confidentiality Laws – An Overview

- Health Insurance Portability and Accountability Act (HIPAA)
- Federal Drug & Alcohol Confidentiality Law (42 CFR, Part 2)
- Family Educational Rights and Privacy Act (FERPA)

HIPAA

Health Privacy and
Health Security

Physical Health
and
Mental Health
Information

42 CFR Part 2

Alcohol and Drug
Abuse Information



What is HIPAA?

The Health Insurance Portability and Accountability Act (HIPAA) of 1996 is Federal legislation enforcing:

- the **portability** of health care coverage;
- the **security and privacy** of health information; and
- **an accounting** of how individual health care information is handled and protected.

H

Health

I

Insurance

P

Portability and

A

Accountability

A

Act of 1996

If a state or federal law contains stricter requirements than HIPAA, the more restrictive law takes precedent.



What is 42 CFR, Part 2?

- Federal regulation which governs the confidentiality of drug and alcohol abuse treatment and prevention records
- A written consent must contain certain elements and be narrowly tailored to limit disclosure to the specific parameters in the consent.

<http://www.healthinfolaw.org/sites/default/files/article-files/FF-%20Part%202.pdf>



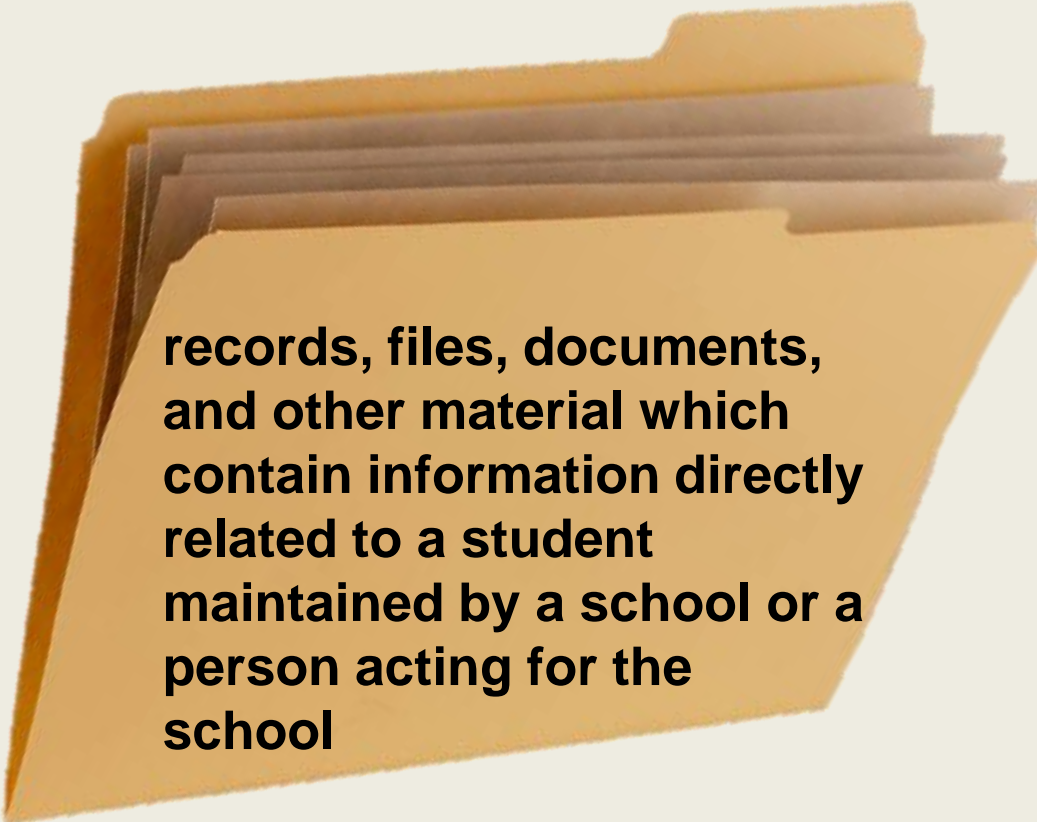
What is FERPA's purpose?

- Protect privacy interests of students' education records
- Prohibits schools from disclosing personally identifiable information without consent of parent



What does FERPA do?

Governs access to and release of educational records by public and private schools **that receive federal funding.**



**records, files, documents,
and other material which
contain information directly
related to a student
maintained by a school or a
person acting for the
school**

HIPAA

School-based health centers run by covered entities

Private schools that get no federal funding

School health care providers submitting payments electronically

FERPA

Health care information entered by school staff

School health care centers



Standardized Authorization/Consent Form

- Includes all agency contact information
- Includes youth information and identifiers for youth
- Has a section for ‘consenter’ – person authorized to provide legal consent for information sharing
- Provides list of agencies and service providers
- Allows form to be filled out online or manually
- Gives a clear understanding of the purpose of the information sharing that will occur
- Provides a list of disclaimers by record types
- Allows requester to review record types or categories with families in the process

Demo of Authorization/Consent to Release Information Form



Implementation of Form and Process Changes

- Piloted form with Jefferson County Juvenile Assessment Center staff
- Reviewed outcomes of the Pilot
 - Changes and improvements identified
 - Redeployment of form
- Implemented with SB94 staff
 - Changes and improvements identified
 - Reviewed training needs and tools
- Final changes deployed
- Presented new form to state leadership; received endorsement
- Hosted 6 Summits across the state, trained 550 multi-system staff



Needs from the Field

- Training on Information Sharing including HIPAA, FERPA, 42 CFR
 - Make this a part of each agency's core training
- Common Consent/Authorization to Release Form
 - Mandate/encourage its use by your systems
- Continue to work toward interoperability with your IT systems
 - Use the data exchanges, CCYIS documents and processes, if not the CCYIS Collaborative itself to guide the information sharing future for Colorado



Resources

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Website with links to documents and training:

<http://dcj.oajja.state.co.us/>