

THE INFORMATION IN THIS BOX IS NOT A PART OF THE CONTRACT AND IS FOR COUNTY USE ONLY



Contract Number  
**24-1268**

SAP Number

### Department of Public Health

Department Contract Representative Stephanie Ramos  
Telephone Number 840-587-6596

Contractor Department of Health Care Access and Information  
Contractor Representative Baldev Grewal  
Telephone Number 916-326-3600  
Contract Term Effective Upon Execution  
Original Contract Amount Non-Financial  
Amendment Amount \$0  
Total Contract Amount \$0  
Cost Center NA  
Grant Number (if applicable) NA

**Briefly describe the general nature of the contract:**

Approve Limited Data Request No. CS0002741 to the Department of Health Care Access and Information, to request and receive health-related and population non-public patient level data.

**FOR COUNTY USE ONLY**

Approved as to Legal Form

  
\_\_\_\_\_

Adam Ebright, County Counsel


Date 12/05/2024

Reviewed for Contract Compliance

\_\_\_\_\_

Date \_\_\_\_\_

Reviewed/Approved by Department

  
\_\_\_\_\_

Joshua Dugas, Director

Date 12/05/2024



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## Limited Data Request

Request number - CS0002741

HCAI offers several types of non-public data to licensed California Hospitals and California Local Health Departments. Eligible hospitals and local health departments may request Limited Model Data Sets for Patient Discharge Data, including Inpatient (PDD), Emergency Department (EDD), and Ambulatory Surgery Center (ASD). They may also order Patient Origin/Market Share data (PO/MS), created to assist hospitals and communities facing tremendous budgetary pressures, which makes the need to understand key operating performance issues critical. In addition, there are also Prevention Quality Indicators, a set of measures that can be used with hospital inpatient discharge data to identify quality of care for "ambulatory care sensitive conditions. This is data standardized for the Agency for Healthcare Research and Quality (AHRQ PQI.)

The Limited Data Set includes Inpatient (PDD), Emergency Department (EDD) and Ambulatory Surgery (AS) files. The contents of these files, including descriptions of the variables that they contain, are described in the Non-Public Data Documentation. A cross-referenced list of variables across multiple years is contained in the Master Variable Grid.

All documentation linked on this request form can also be found on the Limited Data Request Landing Page.

§128766 of the Health and Safety Code gives HCAI the legal authority to disclose patient-level data to hospitals, Tribal Epidemiology Centers, local health departments and local health officers, and certain federal agencies conducting a statutorily authorized activity. The law provides that the disclosure be consistent with limited data set standards and limitations under 45 CFR §164.514. Any hospital that receives data under §128766 shall not disclose the data to any person or entity except as required or permitted by the HIPAA medical privacy regulations. The hospital and its contractor(s) are prohibited from re-identifying or attempting to re-identify any information received pursuant to §128766. This form must be completed if you are requesting access to a limited data set from HCAI.

### **Organization Identification/Eligibility**

#### *Contact Information*

#### **Health Officer: First Name**

Sharon

#### **Health Officer: Last Name**

Wang

**State**

California

**ZIP Code**

92408

**Phone number**

(909)893-0000

**Email Address**

david.pratt@dph.sbcounty.gov

**Purpose****Please indicate the purpose for which the data are requested**

*Data used for research purposes will require a Research Supplement to be attached before the form is submitted.*

Public Health  Research

**Please describe the specific limited purposes for which the data is requested**

Surveillance of admissions and diagnosis hospitalizations data for use within the San Bernardino County Department of Public Health- Spatial Analytics, Data, and Epidemiology Unit.

**Please explain how the data meets the stated purpose noted above**

The HCAI limited dataset includes hospitalization admission and diagnosis data which may be used to produce descriptive statistics for health program planning and development within the San Bernardino County Department of Public Health- Spatial Analytics, Data, and Epidemiology Unit.

**Receipt and Use of Data****Data Users Within Organization**

San Bernardino County Department of Public Health- Spatial Analytics, Data, and Epidemiology Unit. - Lap Le, DrPH - Data Manager

San Bernardino County Department of Public Health- Spatial Analytics, Data, and Epidemiology Unit. - David Pratt, MPH - Public Health Epidemiologist

**Will this data be released outside of the organization?**

No

**Requested Data and Data Products****Indicate the database(s) and/or product(s) and year(s) of data you are requesting**

**Please Note:** *Non-patient level data products developed using Limited Data Set confidential data are also available. Although these products are not patient level data, they are not de-identified and the requester must agree to treat the information they contain as Protected Health Information (PHI).*

**Patient Discharge Data (PDD)**

**Desired PDD Data Set**

*A Data Justification Grid is required if you select a Custom Data Set. The Data Justification Grid can be found*

**Combination/merge/coordination with other data set(s) or databases**

Combination/merge/coordination with other data set(s) or databases

**Linked patient-level information**

Describe the method for linking patient-level data across years/datasets

**What final product(s) will be developed from this project?**

**Please Note:** Patient-level data cannot be contained in any product that is distributed beyond the requestor.

The San Bernardino County Department of Public Health (SBC DPH), Spatial Analytics, Data, and Epidemiology (SADE) unit will utilize the HCAI dataset to present prevalence indicator data within public health presentations (needs assessments and reports, and data dashboards) to include descriptive statistics and trend analysis.

**Describe how you will treat small cells to avoid identifying individuals**

SBCDPH SADE follows California Department of Health Care Services Data De-Identification Guidelines for statistical de-identification, including the numerator-denominator condition to avoid identifying individuals. More specifically, the Numerator Condition sets a lower limit for the cell size of cells displayed in a table. The DDG has set this limit as any value representing aggregated or summarized records which are derived from less than 11 individuals (clients). Accordingly, SBCDPH SADE will not produce or display HCAI data at the county or zip code level where the raw value or numerator within a rate calculation is less than 11 individuals. (Note: The Denominator Condition sets a minimum value for the denominator. The DDG has identified the lower limit for the denominator to be a minimum value of 20,000. SBCDPH SADE may produce rate calculations at the county and/or zip code level where the denominator is less than 20,000).

**Data Security****Requesting Department**

See the Appendix Security Guidelines Recommended Practices for Safeguarding Access to Confidential Data. These guidelines are an example of the information needed in the security sections below. Please be very specific about the data security.

Describe the security measures under which you propose to use, maintain, and store the requested data. Address each of the main categories below.

**System on which the data will reside (Standalone computer, host-based, networked, etc.)**

San Bernardino County Department of Public Health data secure network drive.

**Hardware/Software (Antivirus, anti-spyware, firewall, etc.) on department systems**

San Bernardino County Department of Public Health has antivirus software installed on each computer and server machines in our environment. We utilize endpoint detection on each of these devices to detect malware/viruses and have protocols in place to resolve these issues. Network security is in place that includes firewalls, network filtering, and patching of software/applications.

**Access Controls (password requirements and safeguards, VPN use, WiFi use, file sharing, logs, etc.)**

San Bernardino County Department of Public Health follows HIPAA compliance through password complexity, password reset time frame, and unique passwords for each staff member. We only allow employees to access our environment locally or remotely using VPN. We require each staff member to setup Multi-Factor Authentication (MFA) to add a secondary form of verification on each account. We have security groups in place to restrict access to only allow necessary access to data based on job requirements. We utilize enterprise grade SIEM to monitor logs and detect any anomalies. Our WIFI utilizes standard security

