

CalOMS & Confidentiality

What is CalOMS?

CalOMS is a California DADP (Department of Alcohol & Drug Programs) reporting requirement. **CalOMS is 42CFR compliant & HIPAA compliant.** CalOMS addresses several system-wide data collection needs:

1. Federal Outcome Reporting Requirements (tied to funding)
2. Evaluation & Guided Evolution of the Treatment System, including:
 - Population served
 - Best practices
 - Effective practices
 - Treatment gaps
 - Funding needs
 - Funding justification

Some of the data that CalOMS asks for seems invasive to a treatment system that is particularly aware and diligent regarding client confidentiality. These same questions were asked throughout the CalOMS development process, and providers and staff across the state are asking the same questions now that the system is being implemented. These are valid questions that speak to the commitment of the AOD field to their client's right to privacy. The answers to these questions are discussed here.

It is important to understand the difference between CalOMS and SWITS. Just as was the case with CADDs, all counties and all treatment providers who receive funding from the state are required to meet the CalOMS requirements, or jeopardize their state funding. The CalOMS requirements come from the state, and SWITS requirements come from the County. The state did not provide the actual data collection tools that are necessary for collecting CalOMS information. They required the data elements and acceptable responses and formats, but required the counties to develop their own tools for meeting those requirements.

SWITS is the tool Sonoma County has chosen in order to meet the CalOMS requirements, as well as other state, federal, and internal data management needs. SWITS has been (and continues to be) developed with input from all county contracted provider organizations.

This means that:

- The state does not have access to any data entered into the SWITS system
- Only specific pieces of information entered into the SWITS system are extracted from SWITS and sent to the state in order to meet CalOMS requirements

Why CalOMS?

Why haven't prior data collection practices met these needs? What makes CalOMS different?

CADDs has not met the data collection needs stated above. Some of these needs were not known or understood when CADDs was implemented. It was the first attempt to collect this type of data, and only as the CADDs data began to be

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evaluated did it become clear how the data could and should be used to improve the system overall. This new and evolving understanding of the purpose for collecting this data eventually led to the development of CalOMS. CalOMS is specifically designed to address the problems discovered with the CADDs data collection, namely:

- Inability to collect outcome data
- Lack of a common language regarding the data being collected by those who collect it (ex: definitions of the various discharge statuses, and terms such as “episode” and “admission,” etc.)
- Inability to verify the integrity of the data collected (ex: what are the true demographics of the clients being served- are they duplicate clients- are providers collecting data on all clients served- are they collecting it with the client present, or after the fact, etc.)
- Inability to answer questions posed by the legislature, the public, and the treatment system regarding the current and evolving system of care and client population

Specific Data Elements

Why would the state need this identifying information about clients?

Some of the specific data elements that have been discussed include the client's name, their Social Security Number, and their Drivers License Number. All three of these fields are used to help minimize the chance that client information is being duplicated or falsified, which was an ongoing concern with CADDs data.

Also, with this level of identifying information we are able to view a client's episode from a statewide perspective that may involve many different providers in many different counties. If the same client is treated in Sonoma County and Santa Barbara County within a certain period of time, we will be able to include all of that information in one episode and get a much better picture of the amount and types of treatment that contributed to that client's outcome.

In addition, the Drivers License Number is one of the most telling and concrete ways to determine how functional our client population is and how prepared they are to support themselves. It is also a strong indicator of the progress a client makes during the treatment episode.

It is also important to remember that CalOMS is self-reported by the client, and **they have the option to decline to state their SSN or Drivers License Number.** We are required to ask the question, but they are not required to provide the information if they are not comfortable with doing so. This is not true for all CalOMS questions, but it is the case for all personally identifying pieces of information other than the client name.

County & State Responsibility

What happens to this data after the county, and then the state, receives it?

Ultimately, the goal is to contact each client 6 months after discharge in order to collect outcome information. At the beginning of treatment and again at discharge if possible, clients are agreeing to be contacted for follow-up purposes. This phase of

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CalOMS has not yet been implemented, and the decision regarding who will be responsible for this level of detailed post-treatment data collection has not yet been finalized. This could become the responsibility of each provider, or each county, or the State of California. Whoever is given the responsibility of collecting the outcome information will need to know precisely whom they are contacting, as well as how to contact them. This is an aspect of the outcome collection issue that is certainly being considered, along with the significant drain on resources for whoever becomes the responsible party.

Client identifying information collected by CalOMS is diligently protected per 42CFR and HIPAA regulations, even when it is submitted to the state. At no time and under no circumstance will the county or the state use this information for any purpose outside of the validation of each client record. The information will not be shared with any other agency, either public or private, and the client will not be contacted unless they have consented to a follow-up contact. All reports developed from CalOMS data and shared with other agencies or the public will be summaries of the data, and will exclude any client-specific information. In addition, any report that the state creates that results from client-specific data (such as CalOMS) must be reviewed by an independent Institutional Review Board, whose job it is to verify the appropriate, ethical, and compliant use of the data.

Client Education

How can we help clients feel more secure about the confidentiality of their information?

There are several ways that providers around the state are helping clients understand and become more comfortable with these new reporting requirements. Some providers are giving clients a CalOMS fact sheet or CalOMS brochure when they come in for treatment, which explains many of the points described above in a client-friendly format. Some are discussing CalOMS specifically with their clients during the intake and/or admission process. Some are choosing to focus on the comfort level of the staff, and are not placing particular importance on CalOMS data as opposed to other types of data when speaking with clients, unless the client voices concerns.

In all instances, it is important for counselors and other staff to be comfortable with the CalOMS process, because clients react instinctively to the comfort level of the interviewer. Our goal is to use CalOMS and SWITS to enhance and improve the client's treatment experience, not distract from or impair that experience. Fostering an open, trusting, and positive environment is a critical component of effective treatment. This environment can really only occur if the interviewer is comfortable with the process and helps the client be comfortable with the process as well.

- For more information about the history and purpose of CalOMS, feel free to visit the California Department of Alcohol and Drug Programs website at <http://www.adp.cahwnet.gov/CalOMS/CalOMSmain.shtml>
- For more information about SWITS, feel free to visit the Sonoma County Alcohol and Other Drug Services website at <http://www.sonoma-county.org/health/aods/wits.htm>
- You may also contact Sarah Moore at smoore3@sonoma-county.org if you have specific questions that have not been addressed here.