

Balancing the Scales: Navigating Data Governance Framework in Social Services

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EXECUTIVE SUMMARY

Data stands as one of the most valuable assets and the biggest liability in the development and delivery of tailored, coordinated client services. There is a compelling need for structured data governance frameworks within social services agencies. As demonstrated in the Santa Clara County Social Services Agency (SSA), robust data governance is crucial for strategic decision-making and maintaining client trust. SSA's Data Governance Committee (DGC) and its System and Data Access Review (SDAR) sub-committee form a multidisciplinary approach that ensures compliance, security, and data integrity amid the growing influx of sensitive information.

The Data Governance Committee's holistic framework balances legal, operational, and ethical considerations while fostering a collaborative culture. By streamlining data sharing through standardized protocols and prioritizing privacy and compliance, SSA improves interdepartmental collaboration, client outcomes, and risk management. This paper serves as a roadmap for Solano County Health and Social Services Department (SCHSSD), emphasizing the importance of investing in data governance to meet stricter federal and state regulations, ultimately providing responsible, client-centered services.

Introduction

In the rapidly evolving data landscape, Solano County Health & Social Services Department (SCHSSD), a superagency managing both health and social services, faces unique challenges that underscore the urgent need for a robust data governance framework. SCHSSD, which handles a vast array of sensitive data, including Protected Health Information (PHI) and Personally Identifiable Information (PII), must navigate complex privacy, security, compliance, and risk management landscapes to maintain client trust and deliver effective services.

The proliferation of data within SCHSSD necessitates a structured approach to data governance to ensure adherence to stringent federal and state regulations such as the Health Insurance Portability and Accountability Act (HIPAA), the California Medical Information Act (CMIA), and various privacy and security agreements mandated by the state healthcare and social services departments. Without a comprehensive data governance framework, the risk of data mismanagement or exposure could severely impact client privacy and the agency's credibility.

Establishing a Data Governance Committee (DGC) is crucial for defining clear management protocols and safeguarding data integrity. Such a committee would provide strategic oversight, establish clear data management guidelines, and enforce rigorous compliance standards, aligning the SCHSSD data practices with both internal policies and regulatory requirements. This paper draws on the experience of the County of Santa Clara's Social Services Agency (SSA) to

illustrate how a similarly structured DGC can enhance operational efficiency, facilitate better risk assessments, and promote ethical data usage within Solano County. Through a detailed review of SSA's Data Governance Committee and System and Data Access Review Sub-Committee's functions, there are actionable insights that can guide the development of Solano County's data governance initiatives, ultimately supporting the development of an integrated data system and the creation of Multi-Agency Release of Information (MAROI) form to support an integrated data system to better coordinate care and provide client-centered services.

Background

The County of Santa Clara's Social Services Agency (SSA) serves a large and diverse population in California's Silicon Valley, an area renowned as a global technology hub and home to over 1.9 million residents from a wide range of ethnicities and socioeconomic backgrounds. The high cost of living in this region drives a significant demand for social services. In contrast, Solano County, while also diverse, represents a different demographic mix with a smaller population facing varying economic challenges. These differences influence the demand and nature of the services required. SSA primarily manages social service programs, whereas SCHSSD uniquely administers both healthcare and social services, integrating a broader spectrum of sensitive client data. This dual role not only complicates the regulatory landscape but arguably amplifies the need for a comprehensive and robust data governance framework to manage the intricacies of both PHI

and PII, ensuring ethical and efficient service delivery.

Before establishing a Data Governance Committee, SSA identified a critical opportunity to enhance its organizational structure by improving the proactive and organized access and sharing of confidential information, thereby continuing to protect service recipients' rights.

In response to these needs, SSA chartered the Data Governance Committee (DGC) in December 2018 and the System and Data Access Review (SDAR) sub-committee in 2022. This initiative marked a paradigm shift aimed at integrating the review of confidential information access or exchange requests through a stakeholder group with appropriate disciplines. This was intended to streamline previously parallel and difficult-to-track processes, enhancing data governance to ensure better protection and utilization of sensitive data.

In comparison, Solano County Health & Social Services, as a superagency managing both health and social services, confronts additional complexities. SCHSSD faces challenges with data silos, data quality, and legality, particularly around defining types of data, consistently documenting justification and risk for access and disclosure of sensitive data, compliance, and privacy protections. SCHSSD strives to deliver integrated services that efficiently meet the needs of their community, necessitating a robust data governance system that can manage the intricacies of health and social data under one unified strategy. This approach not only supports compliance

with health and social service regulations but also enhances the capacity for coordinated care, improving overall service delivery.

Formation of the Data Governance Committee

DGC is composed of members from diverse SSA and County functions (Privacy, IT, Security Risk) (see Appendix Figure 1). Their expertise ensures a holistic understanding of the data governance landscape, enabling comprehensive policymaking.

The DGC benefits from wide-ranging representation, ensuring decisions are informed by diverse perspectives in legal compliance, technical security, and business efficiency. This diversity aligns committee decisions with the agency's mission and ensures a balanced approach.

Executive sponsorship from senior SSA officials is crucial, lending high-level support to the DGC's decisions and integrating their recommendations into the broader agency policies. This reinforces the significance of data governance throughout the organization.

The success of the System and Data Access Review sub-committee is significantly attributed to its flat hierarchical structure and collaborative culture. This approach promotes open discussion and the exchange of ideas, allowing committee members to contribute their expertise without reservation. Such an environment not only protects client data but also supports the operational requirements of SSA departments and external partners. By fostering respectful debate and inclusivity, the SDAR Committee

commits to ethical decision-making and effective consensus-building, ensuring the development of data governance policies that optimally serve the needs of clients and stakeholders.

The SDAR sub-committee, part of the DGC, is tasked with managing data-sharing requests, developing standardized protocols, and providing strategic guidance on data management. Key responsibilities include ensuring compliance, reducing data-sharing risks, educating stakeholders, addressing gaps in SSA's privacy policies, and fostering an ethical data-sharing culture. The SDAR sub-committee has implemented a comprehensive governance framework that outlines access levels, data quality, lifecycle principles, sharing protocols, and adherence to privacy and security standards. It prioritizes minimal necessary data sharing and adheres to the Federal Data Ethics Tenets (see Appendix Figure 2), ensuring all actions maintain the highest levels of data integrity and protection.

Budget Allocation

Originally, the establishment of the DGC did not involve a comprehensive budget that typically would include personnel, IT infrastructure, and training costs. By leveraging existing SSA staff Program Managers and Co-Executive Sponsors manage the responsibilities as other duties assigned, without a formal budgeting process. This grassroots approach evolved over time into the structured committee that exists today. As the DGC matured, the need for a more robust budget became apparent to meet the growing administration demands and the need for training,

software solutions, and infrastructure enhancements as they were identified.

As the committee's responsibilities have expanded, so too have the budget considerations. Currently, personnel costs primarily include salaries for the dedicated Program Managers (FTE 0.8) and Management Analyst (FTE 1.0), along with the time allocated by DGC members and data stewards. Training expenses have grown to cover participation in industry conferences, such as the Data Governance and Information Quality Conference sponsored by DATAVERSITY, which are crucial for keeping the team informed and skilled.

Moving forward, IT costs are anticipated to encompass advanced solutions for data cataloging, a digital SDAR process, and the development of a comprehensive database. This database will document decision outcomes and support documents for audits, facilitating transparency and accountability in data governance practices. For SCHSSD, which manages both healthcare and social services, it is recommended that resources be strategically allocated to address the dual demands of PHI and PII data governance. The budget should prioritize staffing by allocating funds for two full-time positions dedicated to data governance, ensuring ongoing expertise, and focusing on managing the complex data landscape of a superagency. Investment in strong IT infrastructure is critical, supporting integrated data management across health and social service programs with secure data-sharing platforms and advanced data protection technologies. Additionally, continuous professional development for data governance staff

is essential, encompassing workshops, certifications, and conferences to keep pace with regulatory changes and technological advancements. These recommendations aim to ensure that SCHSSD's data governance framework is not only compliant and effective but also resilient and adaptable to the evolving data privacy regulations and the needs of the community it serves.

Allocating resources for a structured DGC framework was vital for a solid SSA data management foundation to ensure scalability for a comprehensive view of the population served by multiple SSA departments. By doing so SSA will be able to identify gaps in services, thereby improving the client's outcome. This holistic perspective enables SSA to:

- **Tailor Services Effectively:** Design and implement services to client's needs, leading to more personalized and impactful care.
- **Ensure Data Security and Compliance:** Protect sensitive PII and PHI, ensuring compliance with Federal and State regulations. Prevent breaches and legal consequences, maintaining trust with clients.
- **Enhance Decision-Making and Collaboration:** Accurate data allows for informed decision-making, improving interdepartmental collaboration to address complex social and health issues.
- **Maximize Efficiency:** Streamlined data management reduces errors and bureaucracy, saving time and resources. Allowing staff to focus on

delivering services instead of data issues.

IT Solutions

Prior to implementing the SDAR sub-committee and workflow, the Data Governance Committee conducted a thorough evaluation of SSA's IT infrastructure. While the assessment revealed strong foundational aspects, it also pinpointed opportunities for enhancement, such as data cataloging, consent management, secure data-sharing platforms, a comprehensive database for decision documentation, and tools for automated data classification. Key criteria for selecting IT solutions were identified as security features (like encryption and masking), regulatory compliance, scalability to accommodate growth, and user-friendly interfaces for ease of use.

SSA's Data Governance Implementation Process

The Data Governance Committee spent seven months developing a structure, identifying key stakeholders, establishing policies and protocols, and clarifying roles and responsibilities, culminating in the initiation of the SDAR sub-committee workflow. Monthly meetings are held to outline authority and set expectations for attendance, participation, decision-making, and frequency. This phased approach has facilitated the inclusion of multiple perspectives, including business operations and legal counsel, to thoroughly vet and document changes, and to identify areas needing new or updated policies. This process supports the integration of policies into business operations, allowing flexibility to adapt

as challenges arise. Early in the process, the DGC engaged all relevant stakeholders to secure their buy-in and involvement, demonstrating how a data governance framework aligns strategically with the SSA's mission and vision. This engagement fostered a culture of compliance and accountability, creating a shared understanding and ownership of data governance objectives that support SSA's priorities.

To enhance the capabilities of DGC members, the Data Governance Program Manager leveraged their IT partners' expertise and industry conferences to impart key principles of data management. This knowledge has been disseminated among stakeholders to bolster data literacy, security protocols, and consistent application of best practices in data governance.

The implementation process used by SSA, which took seven months to establish a comprehensive data governance framework including stakeholder engagement and policy development, may not directly transfer to SCHSSD due to its dual management of health and social services. Solano's need for a more integrated approach to handle PHI and PII under stricter regulatory standards suggests a potentially longer and more complex implementation phase. The engagement strategy effective in SSA's context, aimed at aligning data governance with the agency's mission and vision, should be adapted for Solano, ensuring it encompasses the broader scope of healthcare regulations. Additionally, while SSA's method of using IT partner's expertise and conferences for capacity building proved beneficial, Solano County may require more tailored

training programs to address its unique operational and compliance challenges.

Implementing a Data Governance Committee (DGC) in SCHSSD is expected to face challenges such as resistance to change and technological limitations. Employees may be wary of new procedures due to concerns over increased workload. To mitigate these concerns, it is crucial to implement change management strategies, including detailed training sessions that highlight the benefits, and pilot programs that demonstrate the practical advantages on a smaller scale.

The existing IT infrastructure might require upgrades to meet the new governance standards. Collaborative efforts with IT are essential to ensure that technology solutions are scalable and tailored to meet specific needs. Additionally, harmonizing data-sharing policies across SCHSSD's diverse divisions will involve forming an interdisciplinary DGC to standardize protocols, ensuring consistent access and privacy standards across all areas.

Maintaining transparency and actively engaging stakeholders are also key. Regular updates and open channels for feedback will enhance stakeholder trust and reinforce support for the data governance initiatives.

By proactively addressing these challenges, SCHSSD can significantly improve the likelihood of a successful DGC implementation, leading to sophisticated data management capabilities that enhance service delivery and client outcomes. This strategic approach should include resource allocation, infrastructure upgrades, and stakeholder engagement, ensuring that the DGC is well-equipped

to manage the complex data landscape effectively and sustainably.

Recommendations and Conclusion

By establishing a Data Governance Committee, SCHSSD can significantly enhance the department's capabilities, ensuring data security, compliance, and integrity. This alignment with legal and ethical standards mitigates the risk of breaches and compliance violations while bolstering stakeholder trust and improving the department's reputation through a commitment to ethical data handling.

The DGC will advance data literacy across SCHSSD, empowering employees to make informed decisions and thereby enriching the department's data culture. Operationally, it standardizes data policies, streamlines processes, and bolsters collaboration, thus reducing delays and sharpening decision-making accuracy. As data demands evolve, the DGC's scalable framework will accommodate complex data management needs, keeping SCHSSD adaptable and forward-looking.

To bolster SCHSSD's operational effectiveness and compliance, several strategic recommendations are proposed:

- Establish a comprehensive Data Governance Framework that outlines procedures, standards, and responsibilities for secure and efficient data management.
- Define clear mission and goals for data governance to align with SCHSSD's strategic objectives,

ensuring a shared understanding among stakeholders. Formally charter a Data Governance Committee to oversee data governance strategies, enforce policies, and enhance cross-departmental collaboration.

- Conduct a thorough evaluation of the current IT security landscape and review data use agreements to identify potential vulnerabilities and ensure regulatory compliance.
- Secure adequate funding to support the sustainability of these initiatives, including budget allocations for ongoing training, technology upgrades, and necessary staffing to maintain effective DGC operations.

These steps will lay a robust foundation for managing integrated health and social services data, leading to enhanced service delivery and improved client outcomes for SCHSSD.

To continue enhancing data governance, SCHSSD should implement department-wide education campaigns, conduct periodic audits, and update governance policies regularly. Additionally, expanding the DGC's responsibilities to include proactive data analysis and equity evaluations can prevent disparities among marginalized communities and support the development of a Multi-Agency Release of Information (MAROI) form with an integrated data system.

For SCHSSD, recognized as a "superagency," the implementation of a robust data governance framework is crucial due to the combined

management of PHI and PII across health and social service programs. Adhering to stringent standards like HIPAA and CMIA is essential for effectively balancing privacy, legal, compliance, security, and operational efficiency. This strategic framework will not only streamline service delivery across SCHSSD but also enhance data sharing capabilities with external partners, reinforcing trust with clients and stakeholders and affirming SCHSSD's commitment to delivering client-centered services while safeguarding privacy rights.

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Appendix

Figure 1: **SSA- Data Governance Committee**

SSA – Data Governance Committee		
Members	Roles	Expertise
Executive Sponsorship (2)	Chief Deputy Director of SSA	Agency Goals / Vision
	IT Director, SSA	IT Solutions Strategy
Dedicated Program Manager (2)	Agency Operations	QI/Project Management
	Technology Services & Solutions (TSS)	Program/ Project Management
County Privacy Office	Privacy Officer or delegate	Privacy / Compliance
County Counsel	County Counsel	Legal
Information Security Officer	Information Security Officer	IT Security
Contracts/Risk Management	Contracts/Risk Management Officer	Contracts & Risk
Dedicated Operations Managers	Department Representative (4)	Program Operations
IT Business Relationship Manager	Manager for each division	IT

Figure 2: **Federal Data Ethics Tenets**

Federal Data Ethics Tenets
▪ Uphold Applicable Statutes, Regulations, Professional Practices, and Ethical Standards
▪ Respect the Public, Individuals, and Communities

▪ Respect Privacy and Confidentiality
▪ Act with Honesty, Integrity, and Humility
▪ Hold Oneself and Others Accountable
▪ Promote Transparency to internal stakeholders, reporting out to Executives, and for all audits
▪ Stay Informed of Development in the Fields of Data Management and Data Science