

Procedures for Approving CSB Surveys, Questionnaires, and Other Data Collection Instruments and New or Revised CSB Reporting Requirements



COMMONWEALTH of VIRGINIA

DEPARTMENT OF

BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES

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MEMORANDUM

TO: DBHDS Central Office Staff

FROM: S. Hughes Melton, M.D., MBS, FAAFP, FABAM, Commissioner

SUBJECT: **Procedures for Approving CSB Surveys, Questionnaires, and Other Data Collection Instruments and New or Revised CSB Reporting Requirements**

DATE: 4-17-19

This memorandum revises and reissues the Department of Behavioral Health and Developmental Services (DBHDS) procedures for approving CSB/Behavioral Health Authority (BHA) surveys, questionnaires, and other data collection instruments and establishing or revising CSB reporting requirements initiated by the DBHDS. Section 7.d.4.) of the Community Services Performance Contract with each CSB requires the DBHDS to comply with these procedures. These procedures were last updated by Interim Commissioner Jack Barber on June 23, 2017, and they continue DBHDS's agreement with the Virginia Association of Community Services Boards (VACSB) and its Data Management Committee (DMC) on this topic. Commissioner Howard M. Cullum issued the original memorandum on this subject, Community Services Board Surveys and Data Requests, on December 1, 1987. DBHDS and CSBs continue to share a commitment to improving data about services and individuals receiving services, and to using this data to enhance the quality and effectiveness of behavioral health (mental health and substance use disorder) and developmental disability services.

As the state authority for public behavioral health and developmental services, DBHDS has a responsibility to ensure that data and information about the services system are as accurate, informative, and usable as possible. DBHDS will continue to exercise this responsibility in partnership with CSBs in accordance with provisions in the Community Services Performance Contract and the Partnership Agreement, which are available on the DBHDS web site at <http://www.dbhds.virginia.gov/office-of-management-services>

State Board policy and performance contract provisions in Attachment E address development and implementation of data collection and reporting requirements. Many of these provisions stress the

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collaborative nature of the partnership between the DBHDS and CSBs. The Partnership Agreement states in several places that decisions or determinations will be made jointly by the partners or at least with the fullest possible participation and involvement by the other partners.

These procedures are intended to:

- Support compliance by CSBs and DBHDS with applicable State Board policies and performance contract provisions about data collection and reporting
- Identify data requests from external sources, such as the General Assembly, the Office of the State Inspector General, other state agencies, federal agencies, consumer and advocacy groups, and other affiliated activities and organizations, and describe the most effective and realistic way for CSBs to respond to those requests
- Address CSB concerns about the number, scope, and nature of data requests emanating from the DBHDS and from external sources and reduce data collection and reporting burdens by streamlining and reshaping data requests and accessing data from existing sources to the extent possible
- Assist with identification, implementation, and standardization of data reporting requirements
- Focus efforts and facilitate enhanced communication, collaboration, and consultation about data and reporting requirements among DBHDS staff and with the CSBs
- Improve the quality and availability of data about the public behavioral health and developmental services system; and
- Support development and maintenance of a common data dictionary for use by DBHDS and CSBs in surveys and questionnaires, data collection and reporting requirements, automated applications, electronic health records, and service record documentation requirements.

DBHDS and CSBs have collaborated very effectively through the VACSB DMC on the Community Consumer Submission (CCS) to identify, define, and implement individual consumer and service data collection and reporting requirements. However, for various reasons, not all of these requirements are contained in the CCS; other separate reporting mechanisms continue to exist or be developed. The DMC and DBHDS also have worked effectively to monitor establishment of new data collection instruments or reporting requirements, ensuring that they are consistent with the CCS and Core Services Taxonomy (Taxonomy) to the greatest extent possible and represent only the minimum necessary information in the context of the Health Insurance Portability and Accountability Act (HIPAA). DBHDS will continue to work with the DMC to coordinate and integrate any data collection activities or reporting requirements proposed or developed by DBHDS in order to improve the consistency, accuracy, completeness, and usefulness of data gathered, analyzed, and distributed by DBHDS and to minimize the administrative burdens of data collection and reporting and documentation on CSBs and DBHDS.

Procedure for Approving CSB Surveys, Questionnaires, and Other Data Collection

Instruments: You should adhere to the procedure in Attachment A to secure approval for any survey, questionnaire, or other data collection instrument intended for distribution to CSBs on a statewide, regional, or sub-regional basis, including only a few CSBs. If DBHDS receives a request for data or information from General Assembly members or committee staff, the Governor's Office,

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or the Office of the Secretary of Health and Human Resources that requires a response in less than 72 hours, you should follow as much of this procedure as possible, particularly steps 1 through 3; but you may abridge or omit steps to meet the deadline.

Requests for CSB data from external sources should be handled through this process if the source wants to obtain meaningful participation by CSBs in a survey, questionnaire, or other data collection instrument. Please make sure that external sources with which you work are aware of this procedure. You should coordinate the Central Office and VACSB DMC review of any CSB survey, questionnaire, or other data collection instrument that you receive from an external source if DBHDS decides to assist the source in obtaining the data. Please coordinate your requests thru Susan Elmore, PhD, Special Projects Coordinator, DBHDS, at Susan.Elmore@dbhds.virginia.gov or 804.371.2478.

Procedure for Approving New or Revised CSB Reporting Requirements: You should adhere to the procedure in Attachment B to establish new reporting requirements or modify existing ones that apply to CSBs on a statewide, regional, or sub-regional basis, including only a few CSBs. This procedure covers reporting requirements:

- a. submitted electronically or on paper;
- b. included in the CCS, performance contract reports (CARS), or separate reporting mechanisms;
- c. related to data elements or consumer designation codes; or
- d. about consumer, service, funding, outcome, or performance data and information, including requirements associated with the Appropriation Act or federal block grants.

Attachment D contains the form that Central Office staff use to request data outputs from the Office of Support Services using data from CCS, CARS, and AVATAR. Attachment D contains selected applicable State Board Policy and Performance Contract provisions related to CSB surveys and reporting requirements.

By copy, this memorandum notifies CSB executive directors, VACSB councils, and the VACSB DMC about these procedures. Following these procedures should result in fewer CSB concerns about data requests, thereby eliciting increased cooperation and more useful and accurate data from CSBs. Thank you for your cooperation in supporting our partnership efforts in this area by following these procedures. Please contact Susan Elmore, PhD, Special Projects Coordinator, at Susan.Elmore@dbhds.virginia.gov, if you have any questions about this memorandum or the procedures.

Attachments (5)
SAE/sae

pc: CSB Executive Directors and Information Technology Directors
VACSB Mental Health, Developmental, Substance Use Disorder, Child and Family Services,
Emergency Services, Prevention, and Quality Leadership Council Chairpersons
VACSB Data Management Committee Co-Chairpersons
Jennifer Faison, VACSB Executive Director

Procedures for Approving CSB Surveys, Questionnaires, and Other Data Collection Instruments and New or Revised CSB Reporting Requirements

Attachment A: Procedure for Approving CSB Surveys, Questionnaires, and Other Data Collection Instruments

1. Discuss the data you need with Susan Elmore, PhD, Special Projects Coordinator. If needed a meeting with designated staff listed in Appendix C who have access to Community Consumer Submission (CCS), Community Automated Reporting System (CARS), or OneSource (data warehouse) data, will be scheduled, to ensure that the data you are seeking is not already available at DBHDS from existing sources or through interpolations or extrapolations of available data.
2. If the data is not available, complete the Data Request Form in Attachment D and discuss the data you need and the best way to obtain it with the designated staff listed in Attachment C. If the data includes any protected health information (PHI) or personally identifiable information (PII), contact the DBHDS's Privacy Officer to ensure compliance with the HIPAA privacy rule and applicable state statutes and regulations and DBHDS Instructions. If the data you need involves medications, contact the Pharmacy Services Manager.
3. If, as a result of discussions described in the preceding steps, you determine that a survey, questionnaire, or other data collection instrument is necessary, consult with applicable staff designated in Attachment C, some of whom also have expertise in instrument design for help in developing the survey, questionnaire, or other data collection instrument. Any survey, questionnaire, or other data collection instrument must be consistent or compatible with the current CCS Extract Specifications and Taxonomy to the greatest extent possible.
4. You should develop any survey, questionnaire, or other data collection instrument in collaboration with CSBs whenever possible, ensuring that the interests of CSB executive directors and program, financial management, and information technology staff, as appropriate, are well represented in any collaborative effort with as broad representation and participation as possible. CSB information technology staff representatives must be included whenever data from CCS or about services is involved, and CSB financial management staff representatives must be included whenever data from CARS or about funds or expenditures is involved. Current versions of the CCS Extract Specifications and Taxonomy are available on the DBHDS's web site at <http://www.dbhds.virginia.gov/office-of-management-services>
5. Once you have developed the survey, questionnaire, or other data collection instrument, e-mail copies to Susan Elmore, PhD, Special Projects Coordinator, who will review it for consistency and compatibility with the Taxonomy and CCS. Tiffany Ford will review for compliance with the performance contract, and CARS. Susan Elmore, will share with others who were identified in step 3. Staff whom were consulted in step 3 will review the technical aspects of the survey, questionnaire, or instrument, for example, for reliability and methodological acceptability. These reviews should be completed within ten business days of receipt of the proposed survey, questionnaire, or other data collection instrument.
6. Following these reviews, Susan Elmore, will send the survey, questionnaire, or other data collection instrument to the VACSB DMC Survey Review Committee (SRC) for its review and

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comments. The DMC has agreed to expedite reviews on a quick turnaround basis (one week maximum, usually only several days) using e-mail. The survey, questionnaire, or other instrument should be accompanied by the following information when you send it to the SRC, and the SRC's review and comments on it should focus on this information:

- a brief description of the survey, questionnaire, or instrument with the due date and an explanation of the need for it, citing the appropriate federal or state requirement if applicable, and a brief description of its benefits;
- a description of the congruence of the survey, questionnaire, or instrument with Taxonomy and CCS definitions and data elements, including the data elements that could be collected through the CCS;
- an identification and explanation of any additional unique (non-CCS or non-Taxonomy) data element or documentation requirement in the survey, questionnaire, or instrument;
- a proposed method or mechanism for satisfying the additional requirement; and
- the projected administrative burden associated with the data collection and reporting activities required by the survey, questionnaire, or other data collection instrument.

If the SRC recommends substantive revisions, please work with Susan Elmore, PhD, Special Projects Coordinator to address these recommendations.

7. Before the survey, questionnaire, or other data collection instrument, is distributed; please consult with Susan Elmore, PhD, Special Projects Coordinator on the planned distribution method and dates. The transmittal cover memo or email for all surveys, questionnaires, or instruments that request data from CSBs on a statewide, regional, or sub-regional basis and are initiated by the DBHDS or received from external sources for distribution by the DBHDS should state that the VACSB DMC has reviewed the survey, questionnaire, or other data collection instrument. CSBs will not be expected to respond to a request for data when it is not distributed with this statement. The survey, questionnaire, or other data collection instrument will be disseminated through Susan Elmore, PhD, Special Projects Coordinator.

Procedures for Approving CSB Surveys, Questionnaires, and Other Data Collection Instruments and New or Revised CSB Reporting Requirements

Attachment B: Procedure for Approving New or Revised CSB Reporting Requirements

1. Discuss the new or revised data-reporting requirement with Susan Elmore, PhD, Special Projects Coordinator to ensure that the data you are seeking is not already available in the DBHDS from existing sources or through interpolations or extrapolations of available data.
2. If the data is not available, a meeting will be scheduled discuss the data collection and reporting requirement with the individuals listed in step 1. The new or revised requirement must be consistent or compatible with the current CCS and Taxonomy to the greatest extent possible.
3. Following this review, provide information about the data reporting requirement to the VACSB DMC SRC for its review and comments. Susan Elmore, PhD, Special Project Coordinator will distribute the request to the SRC. The requirement should be accompanied by the following information when you send it to the SRC, and the SRC's review and comments on it should focus on this information:
 - a brief description of the reporting requirement with an explanation of the need for it, citing the appropriate federal or state requirement if applicable, and a brief description of its benefits;
 - a description of the congruence of the reporting requirement with the Taxonomy and CCS definitions and data elements;
 - an identification and explanation of any additional unique (non-CCS or non-Taxonomy) data element or documentation in the requirement;
 - a proposed method or mechanism for satisfying the requirement; and
 - the projected administrative burden associated with the requirement.
4. Following this review, a decision will be made about establishing the data collection and reporting requirement by the DMC and the DBHDS.

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Attachment C: Currently Designated Staff

Position or Office	Currently Designated Staff
Special Projects Coordinator (Lead Point of Contact)	Susan Elmore, PhD ¹
Office of Management Services	Tiffany Ford
Office of Fiscal and Grants Management	John Moore and Eric Billings
Business Analytics Center of Excellence	Allen Wass
Office of Adult Community Behavioral Health Services	Mira Signer
Office of Child and Family Services	Nina Marino
Division of Developmental Services	Cherice Jackson
	Kevin Hankins
Division of Forensic Services	Michael Schaefer, PhD or designee
DBHDS Privacy Officer	Denise A. Dunn, J.D.; Greg Bell
Pharmacy Services Manager	Michele L. Thomas, Pharm.D., BCPP
Office of Data Quality and Visualization	Jodi Kuhn ¹
Office of Human Rights	Deb Lockart, Taneika Goldman
IT Production Support: TEDS & CCS 3 developer	Herve Sherd

¹Knowledgeable about instrument or survey design.

Attachment D: Form to Request Data

Please complete this form and submit it via email to Susan Elmore. Please provide as much lead time as possible, at least one week and at least two weeks for complex requests.

1. Staff Requesting Data:	2. Office:
3. Date of Request (mm/dd/yyyy):	4. Phone No:
5. Date When Data Need was Known by Requester (mm/dd/yyyy):	
6. Date When Data is Needed by Requester (mm/dd/yyyy):	
7. Consequence if this Date is not Met (Please be specific): 	
8. Purpose of Request (e.g., for a grant application or report, legislative report, presentation [to whom?], response to inquiry [e.g., from legislator or legislative committee or staff; state or local agency; advocacy group; reporter; FOIA request]) - please list specific name(s) and contact info.:	
9. What Question or Requirement will the Request Address or How will the Data be Used? 	
10. Will the Data Request be One-time or Recurring? <input type="checkbox"/> One-Time <input type="checkbox"/> Recurring; if recurring, please specify, e.g., weekly, monthly, quarterly, annually:	
11. Does the Request Include Protected Health or Personally Identifiable Information?¹ <input type="checkbox"/> Yes <input type="checkbox"/> No; if yes, explain how it will be protected (e.g., encryption, business assoc. agreement):	
12. Please Describe the Specific Data Requested in as Much Detail as Possible. a. Identify the Source of the Data if Known (e.g., CCS 3, AVATAR, or CARS): b. Indicate the Type of Data (e.g., consumer, financial, service, or other - specify): c. List Specific Data Elements Needed and specify any ranges or other values such as age ranges, employment types, or languages; particular funds, expenditures, or costs; or types of services; refer to current CCS 3 Extract Specifications ² and Core Services Taxonomy: ³	

Attachment D: Form to Request Data

d. Identify Scope of Data (specify statewide, regions, sub-regions, or specific CSBs and indicate whether data should be unduplicated at the specified level or if duplicated data is acceptable):

e. Identify Time Period (specify fiscal years or other periods):

f. Does the Data Need to be Aggregated or Individualized?

Aggregated Individualized

g. Describe Other Data Parameters:

14. Has Requesting Staff Verified Data isn't Available Elsewhere (e.g., from other data bases or reports or other sources outside DBHDS)?

Yes No; if no please explain:

15. Please Describe the Format for Presentation of the Data (e.g., charts, graphs, tables) **and Any Software or Application Requirements** (e.g., Word, Excel, SASS, or Tableau):

16. Other Information Related to the Data or Report Request:

¹Departmental Instructions are at: <http://codie.dbhds.virginia.gov/documents/DIs/di1001.pdf> and <http://codie.dbhds.virginia.gov/documents/DIs/di1002.pdf>.

² CCS 3 Extract Specs define consumer characteristics, service units, transactions, and diagnoses at: <http://www.dbhds.virginia.gov/assets/doc/BH/oss/ccs-3-extract-specifications-fy-2020.pdf>

³ Core Services Taxonomy 7.3 defines core services used in CCS 3; it is available at: <http://www.dbhds.virginia.gov/assets/doc/BH/oss/2010coreservicestaxonomy72v2.pdf>

Thank you for completing this data request form. Staff will contact you as soon as possible to discuss your request and clarify any details.

Attachment E: Selected Applicable State Board Policy and Performance Contract Provisions

State Board Policy 1030 (SYS) 90-3 Consistent Collection and Use of Data About Individuals and Services articulates policy for the collection and use of data and information about services and individuals receiving services by the DBHDS, CSBs, and state facilities and establishes the CCS as the mechanism to collect, report, and utilize data and information about individuals receiving services from CSBs. This policy states that, in all circumstances, the DBHDS, state facilities, and CSBs shall identify collaboratively the minimum data needed to satisfy a specific requirement or accomplish a particular task or responsibility in order to limit the imposition of additional workload burdens on direct service and administrative support staff. The policy further states that nothing in it should be construed to limit the abilities of the DBHDS, state facilities, or CSBs to obtain or utilize any data or information necessary to carry out their legal responsibilities, duties, or authorities.

The policy also states that all current and future requirements for individual and service data and information shall be consistent to the greatest extent possible with each other and with the current Core Services Taxonomy, CCS, and AVATAR and other state facility information systems. All current and future requirements for individual and service data and information shall be identified and addressed collaboratively by the DBHDS, state facilities, and CSBs in accordance with the partnership agreement established in STATE BOARD POLICY 1034. The Core Services Taxonomy and CCS shall be developed and revised collaboratively by the DBHDS, state facilities, and CSBs in accordance with that partnership agreement. Further, the policy states that data and information about individuals receiving services from CSBs and the services they receive shall be collected through the CCS to the greatest extent practicable. The DBHDS and CSBs shall use the CCS whenever possible to collect and report all required data and information and avoid the development and implementation of separate, stand-alone data collection and information system applications.

Finally, the policy states that the DBHDS shall provide for formal liaison with the Virginia Association of Community Services Boards to ensure the VACSB's involvement in issues pertaining to:

- data collection and reporting activities of the DBHDS, CSBs, and state facilities;
- the development of uniform definitions and conventions used in data collection, reporting, and analysis activities; and
- the review of procedures to ensure that they comply with the Health Insurance Portability and Accountability Act and other statutory or regulatory confidentiality requirements.

The complete policy is available at <http://www.dbhds.virginia.gov/about-dbhds/Boards-Councils/state-board-of-BHDS/bhds-policies>

Applicable Community Services Performance Contract Provisions

6. Board Responsibilities

c. Reporting Requirements

- 3.) Subsequent Reporting Requirements:** In accordance with State Board Policy 1030, the CSB shall work with the DBHDS through the Virginia Association of Community Services Boards Data Management Committee (DMC) to ensure that current data and reporting requirements are consistent with each other and the current Core Services Taxonomy, the current CCS, and the Treatment Episode Data Set (TEDS) and other federal reporting requirements. The CSB also shall work with the DBHDS through the DMC in planning and developing any additional reporting or documentation requirements beyond those

identified in this contract to ensure that the requirements are consistent with the current taxonomy, the current CCS, and the TEDS and other federal reporting requirements.

- 4.) **Data Elements:** The CSB shall work with the DBHDS through the DMC to standardize data definitions, periodically review existing required data elements to eliminate elements that are no longer needed, minimize the addition of new data elements to minimum necessary ones, review CSB business processes so that information is collected in a systematic manner, and support efficient extraction of required data from CSB electronic health record systems whenever this is possible.
- 5.) **Streamlining Reporting Requirements:** The CSB shall work with the DBHDS through the DMC to review existing reporting requirements including the current CCS to determine if they are still necessary and, if they are, to streamline and reduce the number of portals through which those reporting requirements are submitted as much as possible; to ensure reporting requirements are consistent with the current CCS Extract Specifications and Core Services Taxonomy; and to maximize the interoperability between DBHDS and CSB data bases to support the electronic exchange of information and comprehensive data analysis.

7. DBHDS Responsibilities

d. Reporting Requirements

- 1.) **Subsequent Reporting Requirements:** In accordance with State Board Policy 1030, the DBHDS shall work with CSBs through the Virginia Association of Community Services Boards Data Management Committee (DMC), to ensure that current data and reporting requirements are consistent with each other, and the current Core Services Taxonomy, the current Community Consumer Submission (CCS), and the Treatment Episode Data Set (TEDS) and other federal reporting requirements. The DBHDS also shall work with CSBs through the DMC in planning and developing any additional reporting or documentation requirements beyond those identified in this contract to ensure that the requirements are consistent with the current taxonomy, the current CCS, and the TEDS and other federal reporting requirements.
- 3.) **Data Elements:** The DBHDS shall work with CSBs through the DMC to standardize data definitions, periodically review existing required data elements to eliminate elements that are no longer needed, minimize the addition of new data elements to minimum necessary ones, review CSB business processes so that information is collected in a systematic manner, and support efficient extraction of required data from CSB electronic health record systems whenever this is possible.
- 4.) **Surveys:** The DBHDS shall ensure that all surveys and requests for data have been reviewed for cost effectiveness and developed through a joint DBHDS and CSB process. The DBHDS shall comply with the Procedures for Approving CSB Surveys, Questionnaires, and Data Collection Instruments and Establishing Reporting Requirements, reissued by Commissioner James Stewart on March 4, 2011.
- 5.) **Streamlining Reporting Requirements:** The DBHDS shall work with CSBs through the DMC to review existing reporting requirements including the current CCS to determine if they are still necessary and, if they are, to streamline and reduce the number of portals through which those reporting requirements are submitted as much as possible; to ensure reporting requirements are consistent with the current CCS Extract Specifications and Core Services Taxonomy; and to maximize the interoperability between DBHDS and CSB data bases to support the electronic exchange of information and comprehensive data analysis.

Selected Applicable Community Services Performance Contract Central Office, State Facility, and Community Services Board Partnership Agreement Provisions

The goal of this agreement is to establish a fully collaborative partnership process through which CSBs, the central office, and state facilities can reach agreements on operational and policy matters and issues. In areas where it has specific statutory accountability, responsibility, or authority, the central Office will make decisions or determinations with the fullest possible participation and involvement by the other partners. In all other areas, the partners will make decisions or determinations jointly. The partners also agree to make decisions and resolve problems at the level closest to the issue or situation, whenever possible. *(2nd paragraph, page 1)*

Section 7: Accountability

The Central Office, State Facilities, and CSBs agree that it is necessary and important to have a system of accountability. *(1st paragraph, page 8)*

Where possible, joint work groups, representing CSBs, the Central Office, and State Facilities, shall review all surveys, measures, or other requirements for relevance, cost benefit, validity, efficiency, and consistency with this statement prior to implementation and on an ongoing basis as requirements change. In areas where it has specific statutory accountability, responsibility, or authority, the Central Office will make decisions or determinations with the fullest possible participation and involvement by the other partners. In all other areas, the partners will make decisions or determinations jointly. *(2nd paragraph, page 8)*

Desirable and Necessary Accountability Areas

1. Mission of the System. As part of a mutual process, the partners, with maximum input from stakeholder groups and individuals receiving services, will define a small number of key missions for the public community and state facility services system and a small number of measures of these missions. State facilities and CSBs will report on these measures at a minimum frequency necessary to determine the level and pattern of performance over several years. *(page 8)*