



COMMONWEALTH of VIRGINIA

DEPARTMENT OF

BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES

Post Office Box 1797

Richmond, Virginia 23218-1797

Telephone (804) 786-3921

Fax (804) 371-6638

www.dbhds.virginia.gov

JAMES W. STEWART, III
COMMISSIONER

MEMORANDUM

TO: Department Central Office Staff

FROM: James W. Stewart, III

SUBJECT: **Procedures for Approving CSB Surveys, Questionnaires, and Data Collection Instruments and Establishing Reporting Requirements**

DATE: March 4, 2011

This memorandum revises and reissues Department procedures for approving CSB surveys, questionnaires, and data collection instruments and establishing CSB reporting requirements initiated by the Department. These procedures were last updated on November 9, 2007, and they continue the Department'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. The Department 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 and developmental services.

As the state authority for public behavioral health (mental health and substance abuse) and developmental services, the Department has a responsibility to ensure that data and information about the services system is as accurate, informative, and usable as possible. The Department will continue to exercise this responsibility in partnership with CSBs per the Community Services Performance Contract Central Office, State Facility, and Community Services Board Partnership Agreement. Several State Board policies and performance contract provisions, included as Attachment D, address development and implementation of data collection and reporting requirements; many of their provisions stress the collaborative nature of the partnership between the Department 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 the Department with applicable State Board policies and performance contract provisions about data collection and reporting;

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- Identify data requests from external sources, such as the General Assembly, the Inspector General, other state agencies, federal agencies, consumer and advocacy groups, and other affiliated activities and organizations, and 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 Department and from external sources;
- Assist with the identification, implementation, and standardization of data reporting requirements;
- Improve data quality and reduce data collection and reporting burdens by streamlining and reshaping data requests and access data from existing sources to the extent possible;
- Focus efforts and facilitate enhanced communication, collaboration, and consultation about data and reporting requirements among the Department and 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 the Department and CSBs in surveys and questionnaires, data collection and reporting requirements, automated applications and systems, and consumer service record documentation requirements.

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

You should adhere to the procedure in Attachment A to secure approval for any survey, questionnaire, or data collection instrument intended for distribution to CSBs on a statewide, regional, or sub-regional basis. If the Department receives a request for data or information from General Assembly members or committee staff, the Governor's Office, 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 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 the Department decides to assist the source in obtaining the data.

Procedure for Establishing Reporting Requirements: The Department 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 for community mental health, developmental, and substance abuse services are contained in the CCS; a few separate reporting mechanisms continue to exist. The DMC and the Department also have worked effectively to monitor the establishment of new reporting requirements in the CCS, ensuring that new data requirements are consistent with the CCS and Taxonomy and represent only the minimum necessary information in the context of the Health Insurance Portability and Accountability Act

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(1996). The Department will continue to work with the DMC to coordinate and integrate any data collection or reporting activities or requirements proposed or developed by the Department in order to improve the consistency, accuracy, completeness, and usefulness of data and information gathered, analyzed, and distributed by the Department and to minimize the administrative burdens of data collection and reporting and documentation on CSBs and the Department.

You should adhere to the procedure in Attachment B to establish new data collection and reporting requirements or modify existing ones that apply to CSBs on a sub-regional, regional, or statewide basis. This procedure covers data collection and reporting requirements: (a) reported electronically or on paper, (b) included in the CCS, performance contract reports (CARS), or separate reporting mechanisms, (c) involving data elements or consumer designation codes, and (d) about consumer, service, funding, outcome, or performance data and information, including requirements associated with the Appropriation Act or federal block grants.

By copy, this memorandum notifies CSB executive directors and the VACSB Data Management Committee 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 the Community Contracting Director if you have any questions about this memorandum.

Enclosures (4)

JWS/prg

pc: CSB Executive Directors and Information Technology Directors
VACSB Mental Health, Intellectual Disability, Substance Abuse, and
Child and Family Services Council and Emergency Services Task Force Chairpersons
VACSB Data Management Committee
Mary Ann Bergeron, VACSB Executive Director
G. Douglas Bevelacqua, Inspector General for Behavioral Health and Developmental
Services

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

1. Discuss the data you need with designated staff in the Office of Community Contracting, the Office of Information Technology Services, and the applicable program office(s) who have access to Community Consumer Submission (CCS) or Community Automated Reporting System (CARS) data, as appropriate, to ensure that the data you are seeking is not already available in the Department from existing sources or through interpolations or extrapolations of available data. Designated staff for these activities are listed in Attachment C.
2. If the data is not available, discuss what 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), contact the Department's Privacy Officer to ensure compliance with the HIPAA privacy rule and applicable state statutes. If the data you need involves medications, contact the Clinical Pharmacy Services Manager.
3. If, as a result of discussions described in the preceding step, you determine that a survey, questionnaire, or data collection instrument is necessary, consult with staff designated in Attachment C who also have expertise in instrument design for help in developing the survey, questionnaire, or data collection instrument. Any survey, questionnaire, or data collection instrument must be consistent or compatible with the current CCS Extract Specifications and Core Services Taxonomy (Taxonomy) to the greatest extent possible.
4. You should develop any survey, questionnaire, or data collection instrument in collaboration with CSBs whenever possible, ensuring that the interests of CSB executive directors, program staff, financial management staff, 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 revenues or expenditures is involved.
5. Once you have developed the survey, questionnaire, or data collection instrument, e-mail copies of it to the individuals listed in steps 1 and 3. Also share a copy of it with the Department's Privacy Officer if PHI is requested. Staff whom you consulted in step 3 will review the technical aspects of the survey, questionnaire, or instrument, e.g., reliability and methodological acceptability. Designated staff in the Office of Community Contracting will review it for consistency and compatibility with the Taxonomy, CCS, performance contract, and CARS. These reviews should be completed within five business days of receipt of the proposed survey, questionnaire, or data collection instrument.
6. Following these reviews, submit the survey, questionnaire, or data collection instrument to the VACSB DMC for its review and comments. The DMC has agreed to expedite reviews on a quick turnaround (one week maximum, usually only several days) basis using FAX machines or e-mail. Contact designated staff in the Office of Community Contracting for questions about or assistance with accessing the DMC. The survey, questionnaire, or instrument should be

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accompanied by the following information when you send it to the DMC and the DMC'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 data collection instrument.

If the DMC recommends substantive revisions, work with designated staff in the Office of Community Contracting and staff with whom you worked on step 3 to address these recommendations.

7. Before you send out the survey, questionnaire, or data collection instrument, consult with designated staff in the Office of Community Contracting on the planned distribution method. The transmittal cover memo or email (e.g., for SurveyMonkey) for all surveys, questionnaires, or instruments that request data of CSBs on a statewide, regional, or sub-regional basis and are initiated by the Department or received from external sources for distribution by the Department must state that the VACSB Data Management Committee has reviewed the survey, questionnaire, or data collection instrument. CSBs will not be expected to respond to a request for data when it is not distributed with this statement. If the survey, questionnaire, or data collection instrument will be disseminated under the Commissioner's signature, route it through designated staff in the Office of Community Contracting with a copy of the DMC review.

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Attachment B: Procedure for Establishing Reporting Requirements

1. Discuss the new or modified data collection and reporting requirement with designated staff in the Offices of Community Contracting and Information Technology Services to ensure that the data you are seeking is not already available in the Department from existing sources or through interpolations or extrapolations of available data.
2. If the data is not available, discuss the data collection and reporting requirement with the individuals listed in step 1. The new or modified requirement must be consistent or compatible with the current CCS and Core Services Taxonomy to the greatest extent possible.
3. Following this review, provide information about the data collection and reporting requirement to the VACSB DMC for its review and comments. Designated staff in the Office of Community Contracting will assist you with distributing the requirement to the DMC. The requirement should be accompanied by the following information when it is sent to the DMC, and the DMC's review and comments on it should focus on this information:
 - a brief description of the 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 requirement with the 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 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.

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Attachment C: Currently Designated Staff

Position or Office	Currently Designated Staff
Office of Community Contracting	Paul R. Gilding or Joel B. Rothenberg
Office of Fiscal and Grants Management	Rosanna VanBodegom Smith or Nancy C. Ford
Office of Information Technology Services	Sanford L. Hostetter, Adrienne Ferriss, or Hervey Sherd
Office of Mental Health Services	George E. Banks and others with access to CCS data
Office of Child and Family Services	Katherine E. Hunter and others with access to CCS data
Office of Developmental Services	Cheri Stierer, Rupinder Kaur, and others with access to CCS data
Office of Substance Abuse Services	Sterling G. Deal, Ph.D. and others with access to CCS data
Department Privacy Officer	Denise A. Dunn, J.D.
Clinical Pharmacy Services Manager	Michele L. Thomas, Pharm.D

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Attachment D: Applicable State Board Policy Provisions

State Board Policy 1030(SYS) 90-3 Consistent Collection and Utilization of Data in State Facilities and Community Services Boards articulates policy about consistent requirements for the collection and use of individual consumer and service data and information by the CSBs, the Department, and state facilities. This policy states that, in all circumstances, the Department, 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 Department, state facilities, or CSBs to obtain or utilize any data or information necessary to carry out their legal responsibilities, duties, or authorities.

This policy also states that all current and future requirements for individual consumer and service data and information shall be consistent, to the greatest extent possible, with each other and with the current core services taxonomy, the current community consumer submission, and the current version of AVATAR and other state facility information systems. All current and future requirements for individual consumer and service data and information shall be identified and addressed collaboratively by the Department, state facilities, and CSBs in accordance with the partnership agreement established in State Board Policy 1034. The core services taxonomy and community consumer submission shall be developed and revised collaboratively by the Department, state facilities, and CSBs in accordance with that partnership agreement.

This policy further states that the Department 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 Department, 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.

State Board Policy 1037 (SYS) 05-4 Individual Consumer Information and the Community Consumer Submission articulates policy for the collection and use of individual consumer and service information and for establishing the community consumer submission as the mechanism through which this information will be collected, reported, and utilized for consumers receiving services from CSBs. This policy states that, in all circumstances, the Department 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 Department or CSBs to obtain and utilize any data or information necessary to carry out their legal responsibilities, duties, or authorities.

This policy also states that data and information about individual consumers receiving services from CSBs and about the services that they receive shall be collected through the community consumer submission (CCS) to the greatest extent practicable. The Department and CSBs shall use the CCS whenever possible to collect, report, and utilize all required data and information about consumers receiving services from CSBs and the services that they receive and

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shall avoid the development and implementation of other separate, stand-alone data collection and information system applications. In order to address needs for particular data that are not included in the CCS, the Department and CSBs shall develop and implement a special report function for the CCS. This function will link data elements in the CCS with additional data elements needed to enable the Department and CSBs to manage, monitor, and evaluate special projects and initiatives funded by the Department and report these additional elements through the CCS extract. The special report function will eliminate duplicate data entry of information already in the CCS, while allowing CSBs to collect and the Department to receive additional information required for special projects.

Finally, the policy states that all current and future requirements for individual consumer and service data and information shall be consistent with each other and with the current core services taxonomy and the current community consumer submission, which includes the CCS data element definitions. All current and future requirements for individual consumer and service data and information shall be identified and addressed collaboratively by CSBs and the Department in accordance with the partnership agreement established in State Board Policy 1034. The core services taxonomy and community consumer submission shall be developed and revised collaboratively by the Department and CSBs in accordance with that partnership agreement.

Applicable FY 2011 Community Services Performance Contract Provisions

6. Board Responsibilities

c. Reporting Requirements

- 3.) **Subsequent Reporting Requirements:** In accordance with State Board Policy 1037, the Board shall work with the Department to ensure that current data and reporting requirements are consistent with each other and the current Core Services Taxonomy, the CCS 3, and the Treatment Episode Data Set (TEDS) and other federal reporting requirements. The Board also shall work with the Department in planning and developing any additional reporting or documentation requirements beyond those identified in this contract, such as the federal mental health and substance abuse National Outcomes Measures (NOMS) when they become effective, to ensure that such requirements are consistent with the current Core Services Taxonomy, the CCS 3, and TEDS and other federal reporting requirements.

7. Department Responsibilities

d. Reporting Requirements

- 1.) In accordance with State Board Policy 1037, the Department shall work with representatives of Boards, including 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 with the current Core Services Taxonomy, the Community Consumer Submission 3 (CCS 3), and TEDS and other federal reporting requirements. The Department also shall work with representatives of Boards, including the DMC, in planning and developing any additional reporting or documentation requirements beyond those identified in this contract, such as the federal mental health and substance abuse National Outcomes Measures (NOMS) when they become effective, to ensure that such requirements are consistent with the current Core Services Taxonomy, the CCS 3, and TEDS and other federal reporting requirements.

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- 3.) The Department shall work with representatives of the Boards, including the DMC, to reduce the number of data elements required whenever this is possible.
- 4.) The Department shall ensure that all surveys and requests for data have been reviewed for cost effectiveness and developed through a joint Department and Board process. The Department shall comply with the Procedures for Approving CSB Surveys, Questionnaires, and Data Collection Instruments and Establishing Reporting Requirements, issued by the Commissioner Reinhard on November 9, 2007.
- 5.) The Department shall work with representatives of the Boards, including the DMC, to review existing reporting requirements outside of the current CCS to determine if they are still necessary and, if they are, to streamline those reporting requirements as much as possible.

Applicable FY 2011 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 7)*

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 7)*

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)*