



## **REGULATION RELATING TO “PHILLY FAMILIES CAN” CENTRALIZED INTAKE DATA SYSTEM**

**WHEREAS**, Section 5-301(b) of the Philadelphia Home Rule Charter authorizes the Board of Health to issue Department of Public Health regulations for the preservation and promotion of the health of the people of Philadelphia; and

**WHEREAS**, there is a strong evidence-base establishing that programming that supports the family unit, including home visiting services and community-based case management services (“Family Support Services”), can improve maternal and child health, prevent child abuse and neglect, encourage positive parenting, and promote child development and school readiness; and

**WHEREAS**, in Philadelphia, there are many organizations offering many different models of Family Support Services for families who are expecting or with children ranging from newborns to age 18, with each organization having distinct eligibility requirements and recruitment processes; and

**WHEREAS**, in order to improve coordination among Family Support Services, the Division of Reproductive, Adolescent, and Child Health of the Philadelphia Department of Public Health (“ReACH”) manages Philly Families CAN (“PF-CAN”), a centralized intake system (“CI System”); and

**WHEREAS**, the management of the CI System involves ReACH receiving identifying information about individuals from the individuals themselves and from agencies that participate in the CI System to facilitate referrals to Family Support Services; and

**WHEREAS**, the privacy of individuals using the CI System and the security of information contained in the CI System is a priority for ReACH;

**NOW, THEREFORE**, the Board of Health hereby adopts this “Regulation Relating to Philly Families CAN Centralized Intake Data System,” as follows:

### **Section 1. Definitions**

*CI System.*

The Centralized Intake System is a secure web-based case management system software program used by the Department to collect information about people seeking referrals to family support programs.

*Client.*

A consumer of Family Support Services.

|                                 |   |
|---------------------------------|---|
| <i>Client Information.</i>      | Information stored in the CI System about a Client, including name, date of birth, phone number, demographic information, and Family Support Services referral information. |
| <i>Department.</i>              | The Philadelphia Department of Public Health  |
| <i>Family Support Services.</i> | Programming designed to support parents and families with children ages 0-18, such as home visiting programs and community-based case management.                           |
| <i>PF CAN Team.</i>             | Department staff with responsibility for managing the CI System and conducting referral activities.   |
| <i>Participating Agency.</i>    | Family Support Services program or agency that participates in the CI System.   |
| <i>System User Agreement.</i>   | A user confidentiality and security agreement signed by Participating Agencies that will use the CI System.   |

## **Section 2. Collection of Client Information by PF CAN Team**

- A. The Department authorizes the PF CAN Team to collect Client Information in the CI System pursuant to 45 CFR Sec. 164.512(b)(1)(i) of the Health Insurance Portability and Accountability (HIPAA) Privacy Rule, which permits covered entities to disclose protected health information to public health authorities for public health activities. The Department is conducting the CI System activities pursuant to its status as a public health authority.
- B. Client Information may be entered into the CI System either: (1) by the Clients themselves or (2) by a Participating Agency. Prior to entering Client Information into the CI System, a Participating Agency shall enter into a System User Agreement with the Department.

## **Section 3. Use of Client Information by the Department and Participating Agencies**

The PF CAN Team may use Client Information in the CI System for the following purposes:

1. Providing Participating Agencies with Client Information concerning Clients interested in receiving Family Support Services; and
2. Reviewing notes from Participating Agencies about Clients' enrollment and receipt of Family Support Services.

Participating Agencies may use Client Information in the CI System for the following purposes:

1. Contacting Clients to complete enrollment into Family Support Service; and
2. Providing notes for the PF CAN Team regarding the enrollment outcomes of the Family Support Services provided to Clients.

#### **Section 4. Confidentiality of Client Information**

The Department shall use appropriate safeguards to prevent unauthorized use or disclosure of Client Information, including limiting access to Client Data to those Department staff who are authorized to compile and prepare Family Support Service referrals.

The Department shall maintain the confidentiality of all data collected pursuant to this Regulation in accordance with applicable laws and regulations and in a manner consistent with the confidentiality standards applicable to the Department's maintenance of case records as set forth at 28 Pa. Code § 27.5a.