



City of Jackson's

Lead Safe Jackson Housing Program

**HIPAA Data Sharing & Partnership w/ Local Health
Department**

JACKSON
Mississippi



Lead Safe Jackson Housing Program Overview

Understanding what is HIPAA

HIPAA (Health Insurance Portability and Accountability Act of 1996) is United States legislation that provides [data privacy](#) and security provisions for safeguarding medical information.

(searchhealthit.techtarget.com/definition/HIPAA)



What are the requirements and how to manage the data you have?

HIPPA REQUIREMENTS:

- Data protection
Patient information is to stored in a secured manner such as an encrypted file
- Confidentially Clauses
Agency/Organization includes verbiage to protect the client/patient personal information

Managing Data (COJ):

- Does not maintain personal health records
- EBLL levels, phone numbers, and names are kept confidential
- Only units that have received interventions are available to the public, addresses ONLY.
- Clients are aware of this during intake

- Client files are kept in secured locations, electronic files are kept through ETO with limited personnel access.
- Hard Copies are maintained in a secured location with LSJHP staff ONLY



MISSISSIPPI STATE DEPARTMENT OF HEALTH

MS Department of Health manages and maintains EBLL data for the City of Jackson. COJ partnered with MSDH to assist clients with children who have EBLs.



MS Department of Health PARTNERSHIP ATTEMPTS

- **2012** – Applied for Lead Hazard Control Grant as a sub-recipient with the MS Department of Health
- **2014** – Applied for Lead Hazard Control Grant alone
 - No cooperation from MDOH on receiving Lead Poisoning Data
- **2015** – Applied for Lead Hazard Control Grant and received a letter from the MDOH only supporting our application with lead exposure and health hazard reduction education materials and presentations.
 - Received Lead Poisoning Data
- **2016** – Awarded Lead Hazard Control Grant Funding
 - Received Lead Poisoning Data
 - Executed Data Use Agreement March 2018



LEAD DATA SHARING BETWEEN AGENCIES (COJ AND MSDH)

Children with EBLLS must be reported to the MS Department of Health:

- MSDH agreed to partner with the City as a referral agency
 - To date COJ has received 2 referrals from MSDH
 - Was told HIPAA prevented MSDH from providing additional clients
 - City signed a Data Use Agreement to receive, review, and report EBLL information

MISSISSIPPI STATE DEPARTMENT OF HEALTH Data Use Agreement Protected Health Information

This Data Use Agreement ("DUA") is effective on the 29 day of January, 2018, ("Effective Date") by and between the Mississippi State Department of Health ("MSDH") ("Data Custodian"), and City of Jackson ("Recipient"), located at 219 S President St Jackson MS 39201 collectively hereinafter referred to as the "Parties".

MSDH ("Data Custodian") is a "Covered Entity" as defined in the Health Insurance Portability and Accountability Act of 1996, as amended ("HIPAA"); and MSDH is providing Recipient with Protected Health Information ("PHI") as defined in 45 Code of Federal Regulations (CFR) §160.103. This DUA shall not be construed as creating HIPAA liabilities if HIPAA is not applicable to the data use and disclosure provided for under this agreement.

The Parties agree to the provisions of this DUA in order to address the requirements of HIPAA and to protect the interest of both Parties.

Description of Data Requested:

Data will be used for annual HUD elevated blood lead level (EBLL) reporting.

This is required information from the Office of Lead Hazard Control and Healthy Homes (OLCHHH).

1. **DEFINITIONS.** Except as otherwise defined herein, any and all capitalized terms in this DUA shall have the definitions set forth in HIPAA. In the event of any inconsistency between the provisions of this DUA and mandatory provisions of HIPAA, as amended, the HIPAA provision shall control. Where provisions of this DUA are different than those provided in HIPAA, but are permitted by HIPAA, the provisions of this DUA shall control. PHI shall mean Individually Identifiable Health Information.

Please find below the data requested regarding children tested and identified with blood lead levels $\geq 5\mu\text{g/dL}$ during Calendar Year 2017 for the following zip codes: 39201, 39202, 39203, 39204, 39205, 39206, 39207, 39209, 39210, 39211, 39212, 39213, 39215, 39216, 39217, 39225, 39236, 39250, 39269, 39271, 39282, 39283, 39284, 39286, 39289, 39296, 39298.

Capillary Results

ZIP	Number
39204	3
39206	2
39209	4
39211	2
39212	4
Grand Total	15

Venous Results

ZIP	Number
39202	3
39204	4
39206	5
39209	4
39212	4
39216	1
Grand Total	21

Information received after Data Use Agreement was approved.



Impacts on data sharing agreements

The City of Jackson currently has an executed Data Use Agreement with the Mississippi State Department of Health.

However, the data we receive is limited to number of elevated blood lead level results for zip codes in Jackson, MS.

- The data is not useful
- The data does not yield to us any viable candidates for Lead Intervention activities



How to approach a data partner with a new understanding of what you can share

- The State Department of Health has agreed to send families with children with elevated blood levels a flyer about the City's Lead Safe Jackson Housing Program
- COJ is actively seeking other methods of approach to encourage a stronger partnership with MSDH
- Currently, outreach activities are being conducted in the areas where eblls were reported (hoping to locate the families represented in the very limited data that was received)

The City of Jackson, has decided to take the following steps to ensure that we can reach the families with children at risk for Lead Poisoning:

- Outreach at Elementary Schools, and Daycare Centers
- Attend community events and health fairs that are marketed to families
- Meetings with Property Owners



COJ Process of Data Acquisition

- In addition to what is already implemented, the City also does the following to acquire data:
 - Each applicant provides the City with an EBLI report from the child's physician:
 - The parent/guardian requests the information (doesn't violate HIPAA)
 - Information is received to the City from the parent/guardian
 - City is not requesting information directly from clinics and/or hospitals
 - Local clinics and pediatricians have agreed to share program contact information with parents/guardians of children with EBLIs of any level

THE CITY MAINTAINS ITS' COMMITMENT TO HIPAA COMPLIANCE. ALL DATA IS SECURE AND CLIENT INFORMATION IS CONFIDENTIAL. NO INFORMATION IS SHARED OR DISPLAYED WITHOUT CLIENTS KNOWLEDGE AND PERMISSION.

**City of Jackson
Department of Planning
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