

## **Apricot Use Policy**

### **City of Oakland Department of Violence Prevention**

The Department of Violence Prevention (DVP) has a mandate to reduce levels of gun violence, intimate partner violence, commercial sexual exploitation, and trauma associated with these forms of violence in Oakland. Each year, the DVP distributes approximately \$13 million to community-based organizations (CBOs) in Oakland that deliver intervention services related to these forms of violence. The DVP also provides direct services in the areas of intensive life coaching and violence interruption.

#### **A. Purpose**

The Apricot data management system, developed by Bonterra (formerly Social Solutions Global, Inc.), enables the DVP and its funded CBOs to track information that is essential to effective service delivery and grant management. Direct service staff use the system to enter data on enrollment, service engagement, milestone achievement, and outcomes for individuals served, as well as attendance, duration, and content for group services. Supervisory staff use the system to monitor services delivered by direct service staff and track performance metrics. Grant management staff use the system to track budget spenddown, track progress on contract deliverables, and receive and process quarterly invoices. DVP program staff use the system to coordinate services across agencies and support the effective implementation of services. DVP data and evaluation staff use the system to summarize service delivery and outcome data for external reports, monitor the completion of participant consent forms and adherence to service eligibility criteria, and identify and remediate data entry errors. Lastly, external evaluators use data entered in Apricot to assess the implementation and impact of services delivered or funded by the DVP.

#### **B. Authorized Use**

Data stored in Apricot is accessed on a need-to-know and right-to-know basis, meaning that DVP and CBO staff members only have access to information that is essential to their job function. Categories of Apricot system usage are described below.

- **Service delivery:** Direct service and supervision staff employed by the DVP and funded CBOs use Apricot to track information on participant enrollment, contacts, progress towards milestones, service referrals, and other aspects of service delivery. Direct service staff include individuals such as case managers and life coaches who work directly with participants to deliver services or programming. Supervision staff are supervisors of direct service staff.
- **Service coordination and monitoring:** Select staff members within the DVP who coordinate and monitor services have access to data entered by CBOs to ensure services are delivered in a timely, responsive, and coordinated manner.
- **Grant management:** Grant management staff from CBOs use the system to complete quarterly grant reports, enter quarterly expenses, access approved quarterly invoices, and submit budget or scope modifications. Grant management staff from the DVP use the system to track grantees' budget spenddown, receive and process budget or scope

modifications, track grantees’ progress on contract deliverables, monitor the completion of participant consent forms and adherence to service eligibility criteria, and receive and process quarterly invoices.

- **Reporting and evaluation:** DVP data and evaluation staff use the system to summarize service delivery and outcome data for a variety of external audiences, including councilmembers, commissioners, and external funders. These staff perform monthly data quality assurance checks to identify and remediate data entry errors, and they extract and prepare data for external evaluators.
- **External evaluation:** External evaluators contracted by the City of Oakland use data from Apricot to evaluate the effectiveness of services delivered by the DVP and funded CBOs. Evaluators seek and receive institutional review board (IRB) approval prior to commencing research activities. Once IRB approval is obtained, evaluators only have access to personally-identifiable information for individuals who have signed a consent form agreeing to have their identifiable data shared with a third-party evaluator. For participants who do not sign a consent form, evaluators receive deidentified or aggregate data.

### C. Data Collection

Service delivery data are entered into Apricot by direct service staff employed by the DVP and contracted CBOs. **Tables 1 and 2** provide an overview of the types of data collected through each Apricot form.

**Table 1. Types of data collected through Apricot forms used for individual services.**

Form	Types of data fields
Family and victim support	<ol style="list-style-type: none"> <li>1. Date next-of-kin information received</li> <li>2. Date next-of-kin successfully contacted</li> <li>2. Types and amount of support provided (e.g. basic needs, funeral/vigil planning, victim of crime application)</li> </ol>
Housing placement	<ol style="list-style-type: none"> <li>1. Dates housed</li> <li>2. Housing type (e.g. permanent, transitional, shelter)</li> <li>3. Funding disbursement date and amount where applicable</li> </ol>
Incentives	<ol style="list-style-type: none"> <li>1. Date of disbursement</li> <li>2. Incentive amount</li> <li>3. Justification for incentive</li> </ol>
Intake and needs assessment	<ol style="list-style-type: none"> <li>1. Date of intake and needs assessment</li> <li>2. Other questions specific to strategy or service provider</li> </ol>
Job placement: Work experience	<ol style="list-style-type: none"> <li>1. Dates employed</li> <li>2. Wages at beginning and end of employment</li> <li>3. Weekly hours worked at beginning and end of employment</li> <li>4. Type of employment (subsidized vs. permanent)</li> </ol>
Life map goals	<ol style="list-style-type: none"> <li>1. Goal start date, status and completion date</li> <li>2. Goal category and current progress notes</li> <li>2. Planned and accomplished actions associated with goals</li> </ol>
Participant record	<ol style="list-style-type: none"> <li>1. Name and date of birth</li> </ol>

Form	Types of data fields
	<ol style="list-style-type: none"> <li>2. Contact information</li> <li>3. Demographic information (race, gender, education, language spoken at home)</li> <li>4. Employment status</li> <li>5. Housing status</li> <li>6. School information, if applicable</li> <li>7. Names and contact information of important people, if participant chooses to provide (e.g. probation officer)</li> </ol>
Program enrollment	<ol style="list-style-type: none"> <li>1. Date and source of referral</li> <li>2. Dates of enrollment and exit</li> <li>3. Type of program</li> <li>4. Evaluation consent response</li> <li>5. Basic needs check, if applicable</li> <li>6. Eligibility screener, if applicable</li> <li>7. Reason for exit</li> </ol>
Referral to services	<ol style="list-style-type: none"> <li>1. Date of referral</li> <li>2. Type of service referral</li> <li>3. Name of organization referred to</li> </ol>
Service notes	<ol style="list-style-type: none"> <li>1. Date, service provided, contact method, who was the meeting with, duration, and service notes</li> <li>2. Flex funds provided, if applicable</li> <li>3. Type of legal assistance provided, if applicable</li> </ol>

**Table 2. Types of data collected through Apricot forms for group services and response activities.**

Form	Types of data fields
Group activity	<ol style="list-style-type: none"> <li>1. Date, location, and duration of activity</li> <li>2. Number and type (e.g. students, residents, teachers) of people in attendance</li> <li>3. Type of activity (e.g. training, support group)</li> <li>4. Attendance</li> </ol>
Employer profile	<ol style="list-style-type: none"> <li>1. Name of employer</li> <li>2. Contact information for employer</li> <li>3. Type of employment field</li> </ol>
Crisis navigation	<ol style="list-style-type: none"> <li>1. Date and location of contact</li> <li>2. Basic demographic information (age, gender, race)</li> <li>3. Yes/No: Was safety plan developed?</li> <li>4. Yes/No: Did the individual agree to short-term case management?</li> <li>5. Yes/No: Did you make a referral?</li> <li>6. Referral details, if applicable</li> </ol>
Hospital response	<ol style="list-style-type: none"> <li>1. Date and location of initial notification</li> <li>2. Date and time of visits for service</li> <li>3. Initials and demographics of individual visited</li> <li>4. Yes/No: Was safety plan developed?</li> <li>5. Yes/No: Did the individual agree to short-term case management?</li> </ol>

Form	Types of data fields
Relocation referral	<ol style="list-style-type: none"> <li>1. Referring staff name, agency and contact details</li> <li>2. Name, contact info and demographic info (age, gender, race) of individual being relocated</li> <li>3. Number of individuals in the family</li> <li>4. Date and types of relocation support requested</li> <li>5. Date and result of request for relocation support/funding</li> </ol>
Shooting and homicide incident	<ol style="list-style-type: none"> <li>1. Date and time of notification</li> <li>2. Location of incident</li> <li>3. Date and time of notification to network</li> <li>4. Location of victim, injury type, homicide (yes/no), number of people injured</li> <li>5. Notes on follow-up and retaliation level</li> </ol>
Violence interruption	<ol style="list-style-type: none"> <li>1. Date and duration of interaction</li> <li>2. Violence Interrupter name, type (community, DVP, school) and agency name if applicable</li> <li>3. Type of activity</li> <li>4. Number of people interacted with and who they talk to (impacted person, influencer, other community member)</li> <li>5. Location of conversation</li> <li>6. If the interaction is related to any active conflicts or shooting/homicide incident</li> <li>7. Was a safety assessment conducted</li> <li>6. Outcome of conversation</li> </ol>

**Tables 3 and 4** identify the types of data CBOs are expected to enter for services related to gun violence and gender-based violence, respectively. For services that require individual-level data, Tables 3 and 4 also identify whether personally-identifiable information (PII) is required. PII is any information that can be used to distinguish one person from another and can be used to deanonymize previously anonymous data. For services that do not require entry of PII, which includes all gender-based violence services and youth services, PII should only be entered if the participant (and a guardian, in the case of minors) completes a consent form agreeing for their PII to be entered. In cases when participants do not agree, CBOs should use unique identifiers in place of PII. Unique identifiers are numeric codes that link to a key with participant names and dates of birth by CBOs outside the Apricot database. Evaluation of CBO performance by the DVP will not be contingent on the rate of consent. If a CBO has a consent rate that is less than 80%, the DVP will work with the CBO to explore options for increasing rates.

**Table 3. Categories of data entered in Apricot for services related to gun violence.**

Activity	Is individual-level data entered?	Is PII required?	Is group-level data entered?
Adult employment	Yes	Yes	Yes
Adult life coaching	Yes	Yes	No
Emergency relocation	Yes	Yes	No
Family and victim support	Yes	Yes	Yes
Healing	Yes	Yes	Yes
Hospital-based intervention	Sometimes	Yes	No

Activity	Is individual-level data entered?	Is PII required?	Is group-level data entered?
Violence interruption	No	N/A	No
Youth diversion	Yes	No	No
Youth employment	Yes	No	Yes
Youth life coaching	Yes	No	No

**Table 4. Categories of data entered in Apricot for services related to gender-based violence.**

Activity	Is individual-level data entered?	Is PII required?	Is group-level data entered?
24-hour hotlines	No	N/A	No
Crisis response	Sometimes	No	No
Emergency shelter	Yes	No	No
Healing services	Yes	No	Yes
Legal advocacy	Yes	No	No
Life coaching	Yes	No	No
Transitional housing	Yes	No	No

For activities that require PII, CBOs are encouraged to notify participants that their name and date of birth are documented in Apricot for purposes of effective service delivery and coordination. Participants are also asked to complete a consent form regarding potential access to their PII by a third-party evaluator. Completion of this consent form is strongly encouraged but is not a requirement of service delivery for any strategy, and participants are able to decline having their PII accessed by a third-party evaluator if they wish. Additionally, CBOs in the DVP network are not evaluated based on their rates of participant consent to sharing data with an external evaluator.

#### **D. Data Access**

The DVP takes special care to ensure that data within Apricot are accessed on a need-to-know and right-to-know basis, meaning that staff are only be able to access information that is essential to their job function. Apricot allows administrators to restrict access to individual forms, records, and fields for staff members based on their pre-determined access requirements. An overview of data access levels for categories of staff employed by the DVP and contracted CBOs is provided below:

##### **Funded CBOs**

- ***Direct service staff and supervisors*** have access to individual- and group-level service delivery data entered by members of their agency only. Direct service staff and supervisors do NOT have access to service-delivery data for participants being served by other agencies, even if they are the same participants.
- ***Grant management staff*** have access to contract and fiscal documents such as budgets, invoices, and quarterly reports for their agency only. These staff members also have access to aggregate service delivery data pertaining to contract deliverables, which are

automatically calculated based on data entered by direct service staff. Grant management staff do not have access to individual participant records or PII.

## DVP

- **Direct service staff and supervisors** have access to individual- and group-level service delivery data entered by DVP staff. Direct service staff and supervisors within the DVP do NOT have access to service-delivery data for participants being served by other agencies, even if they are the same participants.
- **Service coordination and monitoring:** Select staff members within the DVP who coordinate and monitor services have access to data entered by CBOs to ensure services are delivered in a timely, responsive, and coordinated manner.
- **Grant management staff** have access to contract and fiscal documents such as budgets, invoices, and quarterly reports for all grantees. These staff members also have access to aggregate service delivery data pertaining to contract deliverables, which are automatically calculated based on data entered by direct service staff. Grant management staff do not have access to individual participant records or PII.
- **Data and evaluation staff** have access to all forms and data entered in Apricot, whether by DVP or CBO staff.

Unauthorized use of the system by any staff person with any level of access will lead to disciplinary action, which could include the termination of a CBO's grant agreement and cessation of funding or, with respect to City of Oakland employees, discipline up to and including termination.

## E. Data Protection

Apricot has comprehensive measures in place to maintain data privacy and security. The system sits behind a firewall that extensively controls, tracks, and reports access to the system's internal infrastructure. Apricot meets current U.S. Department of Housing and Urban Development (HUD) domestic violence standards, Homeless Management Information System (HMIS) standards, and Social Security Administration data management and security protocols, as well as minimum required Family Educational Rights and Privacy Act (FERPA) and HIPAA standards. Data entered into Apricot are automatically encrypted while in transit between a user's computer and the system's servers, as well as while at rest. Additionally, users accessing Apricot servers do so via a secure HTTPS connection. More information on privacy and security for the Apricot system is included in **Attachment A**.

## F. Data Retention

Agencies that collect PII for participants based on their funded activities are required to retain the PII for three years following service completion to ensure that data are available for evaluations conducted by external evaluators, which can last for up to three years following service delivery. At the end of three years, agencies will delete PII unless exempted based on legal requirements. Anonymous service delivery data should be retained for an additional four years to allow the DVP to

monitor trends in service delivery over time. At the conclusion of seven years, individual-level data will be permanently deleted from Apricot unless exempted due to legal requirements.

## **G. Public Access**

There is absolutely no public access to individual-level participant data in Apricot. As with any government record, a member of the public may submit a Public Records Act request, but only aggregate data (no PII) would be released subject to applicable federal, state, and local privacy or confidentiality laws. If the DVP receives a request of this nature, staff will work with the City Attorney's Office to respond to the request without sharing PII. The DVP will also notify any contracted CBOs impacted by the data request as soon as reasonably possible. To date, the City of Oakland has only received requests through the Public Records Act for aggregate-level data pertaining to its violence prevention and intervention services.

Aggregate data from Apricot is available in evaluation reports published by third-party evaluation firms and may be shared through public tables, charts, or dashboards created by the DVP.

## **H. Third Party Data Sharing**

External evaluators contracted by the City of Oakland use data in Apricot to evaluate the effectiveness of funded programs. External evaluators only have access to PII for individuals who sign a consent form allowing their PII to be shared with a third-party evaluator. For participants who do not sign a consent form allowing access to their PII, external evaluators receive deidentified or aggregate data.

## **I. Training**

The DVP's data and evaluation staff have attended Apricot training sessions, such as the Certified Apricot Administrator Training, which review Apricot's configuration and tips and tricks for training end users. In addition, DVP staff has access to numerous Apricot trainings through the training library. Using these tools, the DVP's data and evaluation staff train direct service staff, supervisors, and contract and fiscal staff within the DVP and contracted CBOs on how to use Apricot. This includes general trainings, trainings specific to activities, and ongoing options for one-on-one training, support, and technical assistance. All trainings specify appropriate usage of the system pertaining to data privacy and security as outlined in this use policy, and all trained staff members sign a copy of the use policy indicating that they have read and understand it. Trainings also discuss consequences of inappropriate system usage, which could include termination of a CBO's grant agreement and cessation of funding or, with respect to City of Oakland employees, discipline up to and including termination.

Additionally, all staff within the DVP who have access to participant-level data entered by CBOs complete a training called *About Privacy and Confidentiality for Non-HIPAA Covered Entities* from Relias Academy at least once every two years.

## **J. Auditing and Oversight**

The DVP's data and evaluation staff monitor compliance with this use policy of staff within the DVP and contracted CBOs. All actions in the system (add, edit, delete, view, etc.) are accessible

through audit log reports built into the system for administrator monitoring that DVP's data and evaluation staff review regularly. Any indication of inappropriate system usage is thoroughly investigated by the DVP in consultation with the City Attorney's Office. Inappropriate system usage could result in termination of a CBO's grant agreement and cessation of funding or, with respect to City of Oakland employees, discipline up to and including termination.

#### **K. Maintenance**

Bonterra's security mechanisms and procedures are built on the Soc2 Type II Framework with HIPAA amendment and audited by third-party security experts annually to ensure compliance with best-in-class technical safeguards, processes, policies, and procedures. Bonterra has an extensive cloud security team led by their Chief Information Security Officer that uses a broad set of tools for monitoring security, vulnerability, integrity, and uptime across over 19,000 customers. A complete copy of Bonterra's Soc2 Type II has been shared with City of Oakland staff who have signed a non-disclosure agreement, including data and evaluation staff from the DVP and staff from the Information Technology Department.

#### **L. Evaluation**

On an annual basis, the DVP shall present a report regarding Apricot usage to the Privacy Advisory Commission and, subsequently, to the City Council, for an evaluation. Such evaluation shall include what data was collected, how it was used, consent rates of contracted CBOs, and any recommended changes to the use policy.