

Ohio Human Services Data Warehouse Reporting Policy

Article I. Purpose

Section 1.01 This section specifies the policies and procedures pertaining to OHSDW'S governance of data reporting and release, as well as the process for developing reports. Dealing with both initial report development and ongoing reporting using approved formats, the key topics covered include OHSDW governance of data reporting and release, data ownership and control, reporting only aggregate (de-identified) information, timing of reports, contents of reports, the process for report review and approval, data quality and integrity, the handling of special information requests, and data analysis/research agreements.

Article II. Role of Steering Committee

Section 2.01 The OHSDW Steering Committee must agree upon all reports prior to the development of any and all reports following the protocol outlined in Article V and Article VII.

Section 2.02 The OHSDW will meet as needed to make governance decisions regarding data reporting and release.

Section 2.03 No entity will produce reports, share information, or disclose aggregated OHSDW data without approval from the OHSDW Steering Committee.

Article III. Privacy and Confidentiality

Section 3.01 Small sample sizes and data suppression

- (a) Data may be suppressed to limit the disclosure of information about individual clients.
- (b) Tabulations of data shall be suppressed when the table denominator value minus the table numerator value is less than 25 consistent with the Ohio Department of Health Data Standards available here: <https://www.odh.ohio.gov/~media/ODH/ASSETS/Files/data%20statistics/standards/methodological%20standards/disclimit.ashx>
- (c) When data is suppressed to protect the confidentiality of individuals, an indicator (e.g. asterisk) in the suppressed cell and a legend under the table explaining the reason for suppression will be provided.

Section 3.02 OHFA, participating CoCs, or any data analyzing organization are prohibited from reporting or publishing any information that would individually identify a client.

Article IV. OHSDW sponsored / developed reports

Section 4.01 OHSDW reports will serve statewide purposes (per the Vision and Benefits outlined in the MOU).

Section 4.02 OHSDW reports will be representative, objective, accurate, and fair.

Article V. Process for development, review, approval, and release of reports

Section 5.01 The content of future reports may include, but are not limited to statewide aggregate data, aggregate data by program type (e.g., emergency shelter), regional homeless migration, service utilization patterns or trends, patterns of chronic homelessness, longitudinal reports, outcomes analyses, reports combined with other data sources, analytical reports, and other statistics needed to better understand homelessness and cross system involvement by persons experiencing poverty.

Section 5.02 All reports will include a background/introduction, methods, results, discussion including a discussion of data limitations.

Section 5.03 Timing of reports

(a) The timing of future reports will be determined by the OHSDW Steering Committee.

Section 5.04 The process for the review, approval, and release of all new report formats will be conducted by the OHSDW Steering Committee. In this capacity, OHSDW Steering Committee will:

- (a) Define data questions and report needs;
- (b) Review and approve the format of reports; and
- (c) Approve the final release of data and reports.

Section 5.05 The OHSDW Steering Committee will vote on proposed reports using the procedures outlined in the Memorandum of Understanding.

Section 5.06 The OHSDW Steering Committee will directly review any new specific report formats.

Section 5.07 Participating CoCs will not disclose draft OHSDW reports or data. Draft reports or data will remain confidential and be labeled "Confidential Draft."

Section 5.08 Reports may not be published until the OHSDW Steering Committee has approved publication. "Published" means that the report or data are available to OHSDW Steering Committee members for participating CoC use and are a part of the public domain. OHFA will inform the OHSDW when reports have been approved for publication.

Section 5.09 The OHSDW Steering Committee will determine how published reports will be strategically targeted for distribution beyond internal CoC use.

Article VI. Data quality and integrity

Section 6.01 Each participating CoC is responsible for the quality of local data submitted to the OHSDW as indicated in the Data Use Agreement.

Section 6.02 The value of statewide reports depends upon the quality of the data included. The OHSDW Steering Committee has the responsibility for setting data quality standards applicable to reports, such as the minimum number of contributing CoCs and the maximum allowable null values for specific data elements.

Section 6.03 Participating CoCs understand that the credibility of reports will depend largely upon the extent to which they are representative, objective, accurate, fair, and relevant. The OHSDW Steering Committee will keep these concerns in the forefront of all review and consideration of data and reports.

Section 6.04 All reports and data will identify the participating CoCs, time period covered, the percentage of data completeness, and other relevant data quality conditions.

Section 6.05 All reports will contain a section detailing any known data limitations.

Article VII. Third party reporting

Section 7.01 All third-party requests or demands for OHSDW data or reports, whether made to an individual, organization, CoC, or OHFA, must be in writing and transmitted to the OHSDW Steering Committee.

Section 7.02 The OHSDW Steering Committee is responsible for consideration and decisions related to the request or demand. No third-party requests or demands for data or reports may be granted without prior approval from the OHSDW Steering Committee. Each member of the Steering Committee receives a vote on each individual research request. Voting members may indicate approval, disapproval, or approval subject review. Under the approval subject review, OHFA will provide the requested data to the Steering Committee for review prior to releasing the data to the third party requesting access. Members of the Steering Committee may review the data and then make a decision on the approval or disapproval of the data.

Section 7.03 The OHSDW has developed a standardized format for third party requests. Third party requests must specify the question being researched; the data items necessary for analysis, including time period, geographies, populations, and relevant information needed for analysis. Third party requests should include publication and dissemination plans for the requested data.

Section 7.04 The Steering Committee will review the request prior to response and will have 2-full business days to comment on requests. Requests will:

- (a) Only elaborate on data publicly released within reports published by OHSDW, following approval and publication guidelines;
- (b) Provide information on the geography requested if it is more detailed than the state level overview included in high level reports;
- (c) Population sizes will not be reported below cell sizes of 25;

Article VIII. Data analysis and research agreements

Section 8.01 The OHSDW Steering Committee may from time to time determine that use and disclosure of OHSDW data for research or academic purposes is beneficial.

Section 8.02 Such uses and disclosures require a prior written research agreement that meets the standards for such agreements included in the HUD HMIS Data and Technical Standards, including all confidentiality and security protections included therein.

Section 8.03 All research agreements must be in writing and approved by The OHSDW Steering Committee.