

County of Los Angeles CHIEF EXECUTIVE OFFICE

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June 21, 2021

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To:

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From:

Fesia A. Davenport

Chief Executive Officer

REPORT BACK ON EXPANSION AND STANDARDIZATION OF SEXUAL ORIENTATION AND GENDER IDENTITY DATA COLLECTION IN LOS ANGELES COUNTY (ITEM NO. 11, AGENDA OF JANUARY 26, 2021)

On January 26, 2021, the Board of Supervisors (Board) directed the Chief Executive Office (CEO), in coordination with the Chief Information Office and Information Management Committee, to report back to the Board in 90 days, with the following:

- A status report on the progress made on creating standardized questions to be asked in the Standardization of Sexual Orientation and Gender Identity (SOGI) data collection that are in compliance with State mandates on recording and reporting. This update should include input from Statewide LGBTQ+ advocates including, but not limited to, Equality California, the Los Angeles LGBT Center, TransLatin@ Coalition, and Gender Justice LA;
- 2. Recommendations for establishing a Countywide policy that would require departments and agencies of the County of Los Angeles (County) to collect SOGI data, where appropriate, in instances where they are also collecting data on race/ethnicity and other social determinants of health; and
- 3. Recommendations for, and cost analysis on, strategies that can be implemented to make meaningful progress toward collection and reporting of SOGI data in Los Angeles County. These recommendations are to be created in consultation with the Information Technology Governance Bodies.

The SOGI Data Workgroup, comprised of representatives from the Departments of Health Services (DHS), Children and Family Services (DCFS), Mental Health (DMH), Public Social Services (DPSS), and Public Health (DPH), was convened to develop the attached Standardization of SOGI Data Collection Report. The SOGI standards and best practices were also reviewed with and included input from Statewide LGBTQ+ advocates and community members.

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Status of SOGI data collection in the Los Angeles County

As a result of AB 959 - Lesbian, Gay, Bisexual, and Transgender Disparities Reduction Act, and SB 932 - Communicable Diseases: Data Collection, the County's health and human services departments are collecting some form of SOGI data. DPSS and DCFS use Statewide case management systems (California Statewide Automated Welfare System, and Child Welfare Services/Case Management System, respectively) that have been collecting SOGI data as part of client demographics since 2018. DHS has been collecting SOGI data in the Online Realtime Centralized Health Information Database (ORCHID). DMH and DPH are collecting SOGI data as part of the client's "sex" in the Integrated Behavioral Health Information System (IBHIS) and Substance Use Disorder Case Management System (SAGE), respectively.

Recommendation

Most modern systems, such as ORCHID, IBHIS, and SAGE, can accommodate the proposed SOGI data standards with minimal costs. DHS, DMH, and DPH will be recommending the SOGI standards and best practices described in the Standardization of SOGI Data Collection Report to their respective Data Governance Committees for adoption in their respective patient care/case management systems.

The SOGI Data Workgroup will develop and recommend a Technology Directive, based on the SOGI data standards and best practices, to the Information Technology Governance Bodies for adoption.

Should you have any questions concerning this matter, please contact me or Peter Loo, Chief Deputy Chief Information Officer, at (213) 253-5627 or ploo@cio.lacounty.gov.

FAD:JMN:TJM WSK:PL:jmn

Attachment

c: Executive Office, Board of Supervisors
County Counsel
Auditor-Controller
Children and Family Services
Internal Services
Health Services
Mental Health
Public Health
Public Social Services



Peter Loo
Chief Deputy Director





MAY 2021

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Preface

On January 26, 2021, the Board of Supervisors (Board) directed the Chief Executive Office, in coordination with the Office of the Chief Information Officer (OCIO) and the Information Management Committee, to report back to the Board with the following:

- 1. A status report on the progress made on creating standardized questions to be asked in Sexual Orientation and Gender Identity (SOGI) data collection that are in compliance with State mandates on recording and reporting. This update should include input from Statewide lesbian, gay, bisexual, transgendered, and queer (LGBTQ+) advocates, including, but not limited to, Equality California, the Los Angeles LGBT Center, TransLatin@ Coalition, and Gender Justice LA;
- 2. Recommendations for establishing a Countywide policy that would require departments and agencies of the County of Los Angeles (County) to collect SOGI data, where appropriate, in instances where they are also collecting data on race/ethnicity and other social determinants of health; and
- 3. Recommendations for, and cost analysis on, strategies that can be implemented to make meaningful progress toward collection and reporting of SOGI data in the County. These recommendations are to be created in consultation with the Information Technology Governance Bodies.

This Board report prepared by OCIO was guided by a SOGI Data Collection and Reporting Workgroup (SOGI Workgroup) comprised of:

- Jamie Estrada, Department of Children and Family Services
- Rebecca Gitlin, Department of Mental Health
- David Hoang, Sheriff's Department
- Amy Lightstone, Department of Public Health
- Toktam Sadralodabai, Department of Health Services
- Felix Tunador, Department of Health Services
- Francis Xavier, Department of Public Social Services

The recommendations and best practices in this report are informed by research from the Fenway Institute, Human Rights Campaign Foundation's All Children – All Families Initiative, and the Williams Institute at University of California, Los Angeles (UCLA) School of Law.

Additionally, recommendations from the SOGI Workgroup were reviewed with input from LGBTQ+ State and community advocates and community members, including Equality California, Los Angeles LGBT Center, TransLatin@ Coalition, Gender Justice LA, Health Access California, Williams Institute - UCLA School of Law, The Wall Las Memorias Project, First 5 LA, Children's Hospital Los Angeles – University of Southern California, United American Indian Involvement, Californians for Safety and Justice, Special Service for Groups, Avery Everheart, and Addison Rose Vincent.

Collecting Sexual Orientation Gender Identity Data

Purpose

The standardization and collection of pertinent information are essential to data analytics and informed care coordination. Just as the collection of race and ethnicity information identifies and informs targeted services to address disparities, the collection of SOGI data can help characterize the health and human service needs of the LGBTQ+ population and evaluate the health and human service efforts to address these needs, as well as improve the coordination of care.

This report is intended to:

- 1. Establish guidelines for the standard collection of SOGI data across County departments by:
 - a. Using consistent definitions to assess social determinants of health and outcomes
 - b. Recommending best practices to collect SOGI data to inform the coordination of care;
- 2. Provide a status on progress made by County departments in collecting SOGI data; and
- 3. Recommend strategies for implementing SOGI data collection and reporting in the County.

The standards and best practices for collecting and reporting SOGI data in this report are guided by the following principles:

- 1. Easy for population/respondents to understand and answer accurately;
- 2. Affirm individual's identities and is self-identified;
- 3. Clear to those collecting the information to understand its relevance; and
- 4. Practical for collecting data to address the service needs and health disparities and inequities in these populations.

The collection of SOGI data may require adding new lines to current forms or data collection instruments, new fields in care or case management database, and/or questions that staff members or interviewers are trained to ask, depending on how the information is currently collected. For example:

- Do individuals fill out their own forms, or is the data collected during an interview?
- Is data collected using paper forms or digital forms? If forms are digital, is it possible to add or change fields in the database?

Generally, it is better to expand current practices to collect SOGI data than to create new methods and processes. It is also important to incorporate SOGI data best practices and procedures into

existing staff and interviewer training to ensure that the information has been collected consistently with other demographics.

Definitions and Standard Terms

SOGI data, for example, Gender Identity and Sexual Orientation, should be collected as separate distinct fields, in addition to the identification of an individual's sex at birth because of their distinct meanings. The definitions of the SOGI terms are essential for ensuring consistency in collecting and reporting data.

The definitions for Sex, Gender Identity, and Sexual Orientation are provided in the table below:

Term	Definition
Sex	The sex that is designated at birth based on genetic, hormonal, anatomical, and physiologic characteristics.
Male	The male sex that is designated at birth based on genetic, hormonal, anatomical, and physiologic characteristics (e.g., XY chromosomes).
Female	The female sex that is designated at birth based on genetic, hormonal, anatomical, and physiologic characteristics (e.g., XX chromosomes).
Intersex	A term used for those with differences in sex traits or reproductive anatomy, such as differences in external and/or internal genitalia that vary from typical male or female genitalia, or a chromosomal pattern that varies from XX (female) or XY (male).
X	Allows parents to designate "X", a non-binary gender on a child's birth certificate or for individuals who do not identify as either male or female to identify as non-binary on their birth certificate.
Gender Identity	An individual's internal sense of being male, female, some of both, or neither.
Cisgender	An individual whose gender identity matches their sex designated at birth.
Man (cisgender/non-trans man)	An individual whose deeply held core sense is male or man, which is congruent with their sex that was designated at birth.
Woman (cisgender/non-trans woman)	An individual whose deeply held core sense is female or woman, which is congruent with their sex that was designated at birth.

Term	Definition
Non-binary (e.g., Genderqueer, Gender expansive, Gender nonconforming)	An individual whose gender identity falls under a spectrum of terms that are not exclusively masculine or feminine and does not fully conform to sex-linked expectations.
Transgender man/Transmasculine	An individual whose deeply held core sense is male, man or masculine, and not fully congruent with their sex that was designated at birth.
Transgender woman/Transfeminine	An individual whose deeply held core sense is female, woman or feminine, and not fully congruent with their sex that was designated at birth.
Two-Spirit	A Native American/First Nations/Indigenous individual who identifies as having both a masculine and a feminine spirit to describe their sexual, gender, and/or spiritual identity.
Sexual Orientation	Used to refer to a person's emotional, romantic, and sexual attraction to people of a gender identity.
Heterosexual/Straight	An individual whose emotional, romantic, and sexual attraction is to people of the opposite gender.
Bisexual	An individual whose emotional, romantic, and sexual attraction is to people of more than one gender.
Gay/Lesbian	An individual whose emotional, romantic, and sexual attraction is to people of the same gender.
Pansexual	An individual whose emotional, romantic, and sexual attraction is to people of any gender.
Queer	An individual's emotional, romantic, and sexual attraction that falls under a spectrum of orientations that are counter to the mainstream, including those who do not identify as exclusively straight or heterosexual. This term was previously used as a slur but has been reclaimed by many parts of the LGBTQ movement.
Asexual	An individual who has no sexual feelings or desires, or who is not sexually attracted to anyone.

Recommended SOGI Questions

How a question is worded can affect whether those answering find it easy to respond, and the accuracy of those responses. Questions may be asked differently depending on whether the form will be completed by an interviewer or by the respondent or client. This section presents suggested

wording for a range of questions about SOGI data that can be collected on a form or from an interview.

Gender Identity

Researchers have found that a "two-step" approach is the most effective method of collecting gender identity:

- 1. What is your gender identity?
- 2. What was your sex at birth?

The questions should be used together, starting with the gender identity question being asked first. The following introduction is recommended to precede the gender identity question to help inform the respondent or client about the two questions that will be asked:

I want to ask you about your gender identity and your sex designated or listed at birth. Gender identity refers to how you identify yourself, which may not be the same as the sex you were designated or listed at birth. We ask these questions because people are diverse, and we want to make sure we are treating everyone equally and meeting every person's individual needs. If you don't want to answer these questions, you can state that you prefer not to answer.

The gender identity categories are recommended because they are easy to communicate and understand. The "Non-binary" category recognizes the spectrum of gender identities that are not mainstream and provides a write-in for the identity that a respondent or client self-identifies with. The "Another category" option provides a write-in for cultural or spiritual gender variances, such as Two-Spirit for the Indigenous community.

WI	iat is your gender identity?
	Man
	Woman
	Transgender man/Transmasculine
	Transgender woman/Transfeminine
	Non-binary (e.g., genderqueer or gender expansive):
	Another category (e.g., Two-Spirit):
	Undecided/unknown at this time
	Not sure what this question means
	Prefer not to answer

Senate Bill 179, which went into full effect on January 1, 2019, provides for Californians to apply to change their gender markers and creates a non-binary gender category on their California birth certificates, drivers' licenses, identity cards, and gender-change court orders with the letter "X." It also allows for parents to designate "X" on a child's birth certificate. The "Another category" option for the question for sex designated at birth provides a write-in to record identifications other than male or female.

2.	What was your sex designated or listed at birth?	
		Male
		Female
		X
		Another category (e.g., Intersex):
	П	Prefer not to answer

Sexual Orientation

Questions related to sexual orientation are considered "sensitive" questions, both by participants and by personnel collecting the information. These questions ask about behaviors and self-understandings that respondents or clients might feel uncomfortable about revealing because of fear of social stigma or discrimination, or because those behaviors or statuses create personal discomfort. Best practice suggests that, when possible, sexual orientation-related questions be placed on self-administered portions of a form, as part of client demographics. When interviews are used to collect sexual orientation information, best practice suggests that training be provided to interviewers. Training should explain the reason(s) the question is being asked and should include any clarifying language about response categories and the privacy protection of responses. Additionally, different questions are recommended for children/youth and adults, in part for developmental reasons and in part because of generational differences in how people talk about gender and sexual orientation.

Here are some examples of how to help prepare a respondent or client to answer the question regarding their sexual orientation:

For adults: I am going to ask about your sexual orientation. We ask these questions because people are diverse, and we want to make sure we are treating everyone equally and meeting every person's individual needs. If you don't want to answer these questions, you can state that you prefer not to answer or prefer no labels.

For children/youths: I am going to ask about how you identify yourself in terms of your sexual orientation. We ask everyone these questions because we work with all kinds of young people, and they help us make sure everyone is equally safe and supported. If you don't want to answer any of these questions right now, just say skip, prefer not to answer or prefer no labels, and we can move on.

The "Something else" category recognizes the variety of sexual orientations and provides a write-in to record the sexual orientation that a respondent or client self-identifies with. The table below provides examples on how to collect sexual orientation information for adults and youths for both a written and interview format. The "Not sure what this question means" category captures situations where the respondent or client does not understand the question due to language or cultural differences.

Written	Interview
Adult: Do you think of yourself as (check one): Child/Youth: Which of the following best describes your sexual orientation (check one):	Adult: Would you say you are lesbian or gay, straight (meaning not gay or bisexual), or bisexual? Or I can write down another word that you use, such as queer or asexual?
 ☐ Heterosexual/straight ☐ Gay or lesbian ☐ Bisexual or pansexual ☐ Something else (e.g., queer, asexual) 	Child/Youth: Would you say you are lesbian or gay, bisexual, straight, or another word, such as pansexual or asexual? I can also write down if you are questioning your sexual orientation or if you prefer not to use any label.
☐ Undecided/unknown at this time ☐ Not sure what this question means ☐ Prefer not to answer/prefer no labels	 ☐ Heterosexual/straight ☐ Gay or lesbian ☐ Bisexual or pansexual ☐ Something else (e.g., queer, asexual)
	☐ Undecided/unknown at this time ☐ Not sure what this question means ☐ Prefer not to answer/prefer no labels

Status of Collecting SOGI Data

The California Legislature has enacted several laws related to the collection of SOGI data:

- AB 959 Lesbian, Gay, Bisexual, and Transgender Disparities Reduction Act (2015) Requires the Department of Health Care Services (DHCS), the Department of Public Health (DPH), the Department of Social Services (DSS), and the Department of Aging (CDA) to collect voluntary self-identification information on SOGI.
- AB 677 Data collection: sexual orientation (2017) Requires education and employment-related government agencies to collect voluntarily provided SOGI data when collecting other demographic data.
- SB 179 Gender identity: female, male, or non-binary (2018) Legally recognizes "non-binary" as a third gender option on identification documents issued by the State of California, including birth certificates, driver licenses, and identification cards.
- SB 932 Communicable diseases: data collection (2020) Requires public health officials to efficiently and timely collect and report any SOGI data of individuals diagnosed with certain communicable diseases because studies show that the LGBTQ community is uniquely susceptible to the economic and health impacts of communicable diseases, such as COVID-19.

As a result of these legislative requirements, most of the County's health and human services departments and agencies are either collecting or are planning to collect SOGI data as part of the client demographics.

The status of the collection of SOGI data for the County's health and human services departments/agencies are as follows:

Department of Health Services

Online Real-time Centralized Health Information Database (ORCHID) manages patient care records across 23 health facilities, including four County hospitals; admits, transfers, and discharges patients, and schedules clinical and other medical procedures. ORCHID is configured to collect SOGI data, and the table below illustrates the mapping of ORCHID SOGI data to the County SOGI terms:

ORCHID SOGI Terms	County SOGI Terms
Sex	
Male	Male
Female	Female
Ambiguous/unsex	Another category (e.g., intersex or X):
Hermaphrodite/intersex	
Other	
Unknown	
Info not collected	
Refused to answer	Prefer not to answer
Gender Identity	
Male	Male
Female	Female
Transgender male/Trans man/Female-to-male	Transgender man/Transmasculine
Transgender female/Trans woman/Male-to-female	Transgender woman/Transfeminine
Genderqueer, neither exclusively male nor female	Non-binary (e.g., genderqueer or gender expansive)
Other	Another category:
Not reported	Undecided/unknown at this time
	Not sure what this question means
	Prefer not to answer
Sexual Orientation	
Straight or heterosexual	Heterosexual/straight
Lesbian, gay or homosexual	Gay or Lesbian
Bisexual	Bisexual or pansexual
Something else, please describe	Something else (e.g., queer or asexual):

ORCHID SOGI Terms	County SOGI Terms
Don't know	Undecided/unknown at this time
	Not sure what this question means
Choose not to disclose	Prefer not to answer/prefer no labels

Comprehensive Health Accompaniment and Management Platform (CHAMP) is the Whole Person Care case management system and is also used for Housing for Health and a number of Office of Diversion and Reentry (ODR) related programs. CHAMP is configured to collect SOGI data, as well as pronouns for non-binary and transgender clients. The table below illustrates the mapping of CHAMP SOGI data to the County SOGI terms:

CHAMP SOGI Terms	County SOGI Terms
Gender Identity	
Male	Male
Female	Female
Transgender male, Trans man, Female-to-male, Transmasculine	Transgender man/Transmasculine
Transgender female, Trans woman, Male-to-female, Transfeminine	Transgender woman/Transfeminine
Genderqueer, neither exclusively male nor female, non-binary, or gender nonconforming	Non-binary (e.g., genderqueer or gender expansive)
Additional gender category/Other	Another category:
	Undecided/unknown at this time
	Not sure what this question means
Choose not to answer	Prefer not to answer
Sexual Orientation	
Straight or heterosexual	Heterosexual/straight
Lesbian, gay or homosexual	Gay or Lesbian
Bisexual or pansexual	Bisexual or pansexual
Asexual	Something else (e.g., queer or asexual):
Other	
Don't know	Undecided/unknown at this time
	Not sure what this question means
Choose not to answer	Prefer not to answer/prefer no labels

Department of Public Health (Public Health)

Public Health Centers have adopted ORCHID for their patient care management system and are collecting client SOGI data.

Public Health's Substance Use Disorder (SUD) Information System (SAGE) is the current case management system for their SUD network and collects SOGI data as part of client demographics. Sex and gender identity are currently collected as sex, and sexual orientation is collected separately.

The table below maps Sex/Gender Identity and Sexual Orientation collected in SAGE to County SOGI terms:

SAGE SOGI Terms	County SOGI Terms
Sex	
Male	Male
Female	Female
Transgender (F to M) - FTM	
Transgender (M to F) - MTF	
Unknown	
	Another category:
	Prefer not to answer
Sexual Orientation	
Heterosexual/straight	Heterosexual/straight
Lesbian (female)	Gay or Lesbian
Gay (male)	
Bisexual	Bisexual or pansexual
Transgender	
	Something else (e.g., queer or asexual):
Unsure/questioning	Undecided/unknown at this time
	Not sure what this question means
	Prefer not to answer/prefer no labels

Public Health has also drafted a Standard of Practice (SOP) for collecting and reporting SOGI data. Once the SOP is approved, SAGE will be updated to collect Sex, Gender Identity, and Sexual Orientation as separate fields using the terms and best practices in the SOP. The table below maps Sex, Gender Identity, and Sexual Orientation proposed to be collected in the SOP to County SOGI terms:

Standard of Practice SOGI Terms	County SOGI Terms
Sex	
Male	Male
Female	Female

Standard of Practice SOGI Terms	County SOGI Terms
Non-Binary or X	
Other:	Another category (e.g., intersex or X):
Prefer not to answer	Prefer not to answer
Gender Identity	
Male	Male
Female	Female
Transgender male/Trans man	Transgender man/Transmasculine
Transgender female/Trans woman	Transgender woman/Transfeminine
Gender Non-Binary, Gender Non- Conforming	Non-binary (e.g., genderqueer or gender expansive)
Another gender category or another identity:	Another category:
Prefer not to state	Prefer not to answer
Sexual Orientation	
Straight or Heterosexual	Heterosexual/straight
Gay or Lesbian	Gay or Lesbian
Bisexual	Bisexual or pansexual
Something else:	Something else (e.g., queer or asexual):
Not sure	Undecided/unknown at this time
Don't understand the question	Not sure what this question means
Prefer not to state	Prefer not to answer/prefer no labels

Department of Mental Health

Integrated Behavioral Health Information System (IBHIS) is the case management system and currently collects Gender Identity as part of Sex, such as Transgender (Male to Female), Transgender (Female to Male), and Unknown. IBHIS does not collect Sexual Orientation data at this time. The Department of Mental Health plans to recommend the County SOGI data standards and best practices to its IBHIS Clinical Council for adoption in IBHIS. IBHIS user-defined fields can be configured to support SOGI collection as part of client demographics.

Department of Public Social Services

The collection of SOGI data for CalWORKS and CalFresh clients was implemented in the California Statewide Automated Welfare System (CalSAWS) in 2018, as the result of the adoption of AB 959 - Lesbian, Gay, Bisexual, and Transgender Disparities Reduction Act (2015) and SB 179 - Gender identity: female, male, or non-binary (2018). The table below illustrates the mapping of CalSAWS SOGI data to the County SOGI terms:

CalSAWS SOGI Terms	County SOGI Terms
Gender Identity	
Male	Male
Female	Female
Transgender: Male to Female	Transgender man/Transmasculine
Transgender: Female to Male	Transgender woman/Transfeminine
Non-binary (neither male nor female)	Non-binary (e.g., genderqueer or gender expansive)
Additional gender identity	Another category:
Blank	Undecided/unknown at this time
	Not sure what this question means
Decline to state	Prefer not to answer
Sexual Orientation	
Straight or heterosexual	Heterosexual/straight
Gay or Lesbian	Gay or Lesbian
Bisexual	Bisexual or pansexual
Queer	Something else (e.g., queer or asexual):
Unknown	Undecided/unknown at this time
Blank	Not sure what this question means
	Prefer not to answer/prefer no labels

Department of Children and Family Services

Department of Children and Family Services (DCFS) uses a Statewide computer system called the Child Welfare Services Case Management System (CWS/CMS). SOGI fields were added to CWS/CMS in 2018 as the result of the adoption of AB 959 - Lesbian, Gay, Bisexual, and Transgender Disparities Reduction Act (2015), and SB 179 - Gender identity: female, male, or non-binary (2018). DCFS has developed policies to provide guidance and resources for providing services to lesbian, gay, bisexual, transgender, queer, questioning (LGBTQ+) children/non-minor dependents (NMDs) and information on placement requirements for transgender and gender non-conforming (TGNC) children/NMDs in out-of-home care based on current legislation and best practice (http://m.policy.dcfs.lacounty.gov/Src/Content/LGBTQ.htm). In addition to SOGI data, CWS/CMS also collects Gender Expression information. The table below illustrates the mapping of CWS/SMS SOGI data to the County SOGI terms:

CWS/CMS SOGI Terms	County SOGI Terms
Sex	
Male	Male
Female	Female
Intersex	Another category (e.g., intersex or X):
Unknown	
	Prefer not to answer
Gender Identity	
Male	Male
Female	Female
Transgender	Transgender man/Transmasculine
	Transgender woman/Transfeminine
Genderqueer/gender non-binary	Non-binary (e.g., genderqueer or gender expansive)
	Another category:
Unsure	Undecided/unknown at this time
	Not sure what this question means
Not asked	
	Prefer not to answer
Sexual Orientation	
Straight/heterosexual	Heterosexual/straight
Lesbian, gay or same gender loving	Gay or Lesbian
Bisexual	Bisexual or pansexual
Not listed	Something else (e.g., queer or asexual):
Questioning/unsure	Undecided/unknown at this time
Unable to determine	Not sure what this question means
Not asked	
	Prefer not to answer/prefer no labels

Recommendation for Collecting SOGI Data

Develop a Technology Directive to implement the SOGI data collection standards and best practices to improve and enhance delivery of health and human services for adoption by the Business Management and Technology Management Councils, with the following considerations:

1. For departments that have implemented SOGI data but are not using Statewide systems, realign their SOGI data with County standards;

- 2. For departments that are planning to implement SOGI data, adopt County data standards, and/or map more granular data to County SOGI data standards, as appropriate. Operating procedures and training should also be conducted to ensure the appropriate and accurate collection of SOGI data; and
- 3. Determine effort and any associated costs for implementation, as appropriate. Most modern systems do not require significant changes to accommodate collecting SOGI data (e.g., configuring user-defined fields to add data options).