

STRENGTHENING THE DATA ECOSYSTEM

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ON SOCIAL FACTORS OF HEALTH*

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About the Author

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About the Memo

This memo is one of a collection commissioned by the Convergence Center for Policy Resolution as a supplement to [*Health Starts Here: A Blueprint for Action*](#), a report capturing consensus solutions of the [*Convergence Collaborative on Social Factors of Health*](#).

The memo represents the views of the author and do not represent the views of Convergence or necessarily the views of other Collaborative members.

About the Collaborative

It was to find such agreement that Convergence brought together a group of representative stakeholder organizations and experts from health and social policy organizations. Initially, in a series of three brainstorming sessions, the group sought to identify key themes and questions that would have to be explored to reach agreement. Then the group met as a working Convergence Collaborative over several months to identify an agreed set of policy actions, primarily at the federal and state levels. At these meetings, we also invited several “observers”—organizations and experts, including government officials, who contributed greatly to the discussion but for institutional reasons could not add their names or organizations to a policy statement.

These convenings were supported with generous financial support by [**CommonSpirit Health**](#), the [**Episcopal Health Foundation**](#), and [**Kaiser Permanente**](#). Their commitment to the Convergence process of building consensus among people and organizations with different views and priorities made the project possible. We are also grateful to [**UnitedHealth Group Office of Health Equity**](#) for helping us to promote and implement the Collaborative's consensus solutions.

About Convergence

Convergence is the leading organization bridging divides to solve critical challenges through collaborative problem solving across ideological, political, and cultural lines. For more than a decade, Convergence has brought together leaders, doers, and experts to build trusting relationships, identify breakthrough solutions, and form unlikely alliances for constructive change on seemingly intractable issues. Our process is improving the lives of Americans and strengthening democracy for a more resilient and collaborative future.

CONSENSUS SOLUTION FROM HEALTH STARTS HERE BLUEPRINT

The Federal Chief Data Officers (CDOs) Council should convene federal and state CDOs that steward data sets that, if merged, can produce actionable insights for decision-makers at every level. The convening should establish shared objectives for focused collaborations that would address social determinants, including: identifying key questions that require merging individual and community-level data across programs and levels of government; identifying best practices and barriers (perceived and real); developing common terms and uniform standards; and setting up working groups to overcome barriers and facilitating matchmaking of solutions-oriented federal and state officials to move forward improvements.

BACKGROUND AND POSSIBLE ACTION STEPS

The Convergence Collaborative sought to strengthen the data ecosystem available for SDOH initiatives by:

- 1** Building upon successful state and local government initiatives that integrate data held at the state and local level from health and non-health sectors
- 2** Encouraging state and local governments to fully leverage new guidance from OMB clarifying that federal grant funds may be used for data, evaluation, and integrated data systems
- 3** Facilitating problem-solving between federal, state, and local governments to overcome barriers and myths that impede data integration across health and non-health programs.

To do this, Collaborative members built on previous work and initiatives. In November 2023, for instance, the White House Domestic Policy Council and Office of Science and Technology Policy issued the [US Playbook to Address Social Determinants of Health](#), which includes a strategy to expand data gathering and sharing as one of its three pillars. The strategy includes some potentially useful federal actions, but it fails to leverage the significant expertise of state and local governments that have made dramatic advances in developing cross-agency data infrastructure to address SDOH. The playbook's data strategy begins with "Establish a centralized federal data working group" as a subcommittee of the federal Chief Data Officers (CDO) Council within the Executive Office of the President "to address how current federal programs can incorporate interoperable SDOH data into their policy development and implementation."

BACKGROUND AND POSSIBLE ACTION STEPS

To date, the administration has not established this working group. Even if it had, such a group would lack the needed expertise and policy levers to significantly advance the SDOH data ecosystem. Why? Because federal CDOs focus on federally held data and have little knowledge of the state and local data systems that hold vast stores of individual and community-level administrative data for health and social programs. Also, federal CDOs don't control the policy levers to help state and local governments and service providers overcome the barriers to combining and utilizing data locked in separate program and organizational siloes.

Unfortunately, it is no one's job at the federal level to understand the array of challenges that states and localities must overcome to build shared infrastructure that links data across health, human services, education, workforce, housing, criminal justice and other programs. State and local integrated data systems are essential tools for cross-program strategies to address social determinants of health as well as economic mobility – two overarching goals of the over \$900 billion the federal government spends annually on grants to state and local governments to serve vulnerable populations.

A serious federal effort to strengthen the SDOH data landscape should enlist experts from state and local governments that are at the forefront of building and using robust integrated data systems to address SDOH. These pioneering governments – such as Indiana, Ohio, Arkansas, Rhode Island, Kentucky, Washington, and Allegheny County PA – have brought together their budget, finance, data, IT, research, and program administrators to develop governance structures, aligned administrative processes, and IT solutions to link individual and community-level data across a wide range of health and other social programs. Their integrated data systems can answer a broad set of questions related to vulnerable populations, such as:

- **Who is in greatest need of services and what are the best channels to reach them?**
- **How can eligibility determinations and service delivery be better coordinated to improve efficiency, client experiences and outcomes?**
- **What outcomes are being achieved, and what are the most cost-effective interventions?**

These sophisticated state and local integrated data systems use access controls and privacy-enhancing technologies to ensure sensitive data is only accessible to authorized users. Data-sharing arrangements with health and social service providers and external researchers allow useful, privacy-protected data to flow to non-government partners.

BACKGROUND AND POSSIBLE ACTION STEPS

By partnering with experts from these pioneering jurisdictions, the federal government could accelerate nationwide progress by:

- ▶ Identifying the **key questions** that state and local governments and providers should be able to answer and which **source systems** hold authoritative administrative data that can be linked to answer those questions. Most of this data resides in state and local government or provider databases. The federal government holds certain high-value national data sets that should also be readily accessible to state and local governments with necessary privacy protections (e.g., Medicare, IRS tax data, and Census and the National Center for Health Statistics data).
- ▶ Understanding the **major barriers** that state and local governments must overcome to build integrated data systems for SDOH and the **practical solutions** that jurisdictions could adopt. Barriers often cited by state and local governments include lack of funding, federal privacy laws restricting data-sharing, inconsistent terms and lack of uniform data definitions and standards, and insufficient incentives for grantees to co-invest in integrated data systems and share data with other organizations. Leading state and local governments and selected initiatives by federal agencies have created solutions to many of these.
- ▶ Institutionalizing a **cross-agency, intergovernmental working group** to strengthen two-way communications between federal, state, and local governments to continually identify and devise shared solutions and incentives that will strengthen the SDOH data ecosystem.

This intergovernmental approach could build on an April 2024 policy clarification in the Office of Management and Budget's updated [Uniform Grants Guidance](#) that clarifies that grantees may use a portion of their grants for data, evaluation, and integrated data systems. The guidance gives government and non-profit grantees clear permission and encouragement to combine funds from multiple programs to build shared data infrastructure and analytics capacity. To help state and local governments understand the financing mechanisms for leveraging and combining funds from different sources, the National Academy of Public Administration recently developed a [Field Guide for Financing Public Sector Integrated Data Systems and Evaluation](#). The project team, which includes former federal and state senior executives (including me), collaborated with focus groups of federal, state, and local officials that oversee budget, finance, data, audit, evaluation, and program policy. The guide draws on inspiring examples from pioneering state and local jurisdictions to demonstrate the feasibility of navigating existing financing rules and processes, including the complex cost allocation rules for financing integrated health and social services data systems.

Based on interviews and problem-solving sessions with federal, state, and local data and finance leaders, the NAPA field guide project is also identifying future steps the federal government could take to radically simplify the byzantine mechanisms that state and local governments currently must use to fund cross-program data infrastructure. These insights are only possible because of the combined expertise of data-focused practitioners from different agencies at different levels of government. The project expects to culminate with an early 2025 convening of federal, state, and local government officials to explore financing strategies and incentives to encourage state and local governments to develop robust integrated data systems.

BACKGROUND AND POSSIBLE ACTION STEPS

The logical next step for strengthening the SDOH data ecosystem, building on the NAPA field guide project and as the Collaborative report recommends, would be a convening of experts from federal, state and local governments and the provider community that includes representatives from program, data, budget, finance and research functions. Together, they would:

- Develop a shared vision for a future SDOH data ecosystem that links data across organizations and levels of government to routinely generate useful insights for front-line workers and decision-makers on key SDOH questions.
- Examine the perceived and real barriers to strengthening the SDOH data ecosystem and the strategies that leading jurisdictions have used to overcome them.
- Explore solutions that would accelerate nationwide progress, including approaches that simplify financing mechanisms for combining funds, facilitate adoption of common terms and data standardization, expand data-sharing with strong privacy protections, and incentivize grantees to build and continually enhance robust integrated data systems.
- Consider potential applications of AI that will only be possible when high quality, integrated data from multiple sources is accessible.
- Identify core elements of a charter for a future interagency, intergovernmental SDOH working group to foster two-way communication and problem-solving. The charter would allow for outside organizations – including philanthropies, SDOH-focused non-profits and think tanks, state and local government associations, and academic researchers – to contribute resources and expertise.

Rather than wait and hope for the federal government to organize this convening, a wise step would be for a small group of trusted outside organizations to initiate the process by planning and hosting federal, state, and local government and other stakeholders, laying the groundwork for the next federal administration to create an Intergovernmental SDOH Data Working Group.

SCAN TO READ THE FULL BLUEPRINT FOR ACTION ONLINE



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