Apricot 360 Use Policy
City of Oakland Department of Violence Prevention

The Department of Violence Prevention (DVP) formed in 2020 with a mandate to reduce levels of gun violence, intimate partner violence, commercial sexual exploitation, family trauma associated with unsolved homicides, and community trauma associated with ongoing violence in Oakland. The DVP applies a public health approach to violence prevention and intervention efforts that focuses resources on people, neighborhoods, and times of day that are most likely to be impacted by violence. The department also applies different prevention and intervention strategies based on whether individuals are exposed to violence, at risk for violence, or at the center of violence. Each fiscal year, the DVP distributes millions of dollars in funding to community-based organizations (CBOs) in Oakland that deliver prevention and intervention services in the areas of group and gun violence, gender-based violence, and community healing. The DVP also provides direct services in the areas of adult life coaching, violence interruption, and shooting and homicide response.

A. Purpose

The Apricot 360 data management system (Apricot 360), developed by Bonterra (formerly Social Solutions Global, Inc.), will enable the DVP and its contracted CBOs to track information related to service delivery and contract management in the DVP's three strategy areas of group and gun violence, gender-based violence, and community healing. Apricot 360 will be used by direct service staff within the DVP and CBOs to track client enrollment, service engagement, milestones, and outcomes for individual services as well as attendance, duration, and content of group services. Supervisory staff within the DVP and CBOs will use the system to ensure that direct service staff are engaging clients with the expected frequency and delivering services appropriately to facilitate behavior change. The DVP's data and evaluation staff will use Apricot 360 to monitor service delivery and outcome data across each strategy, oversee the activities and deliverables of individual CBOs to ensure alignment with scopes of work and service models, and identify challenges with service delivery that require remediation. Fiscal and contract staff within the DVP and CBOs will use the system to store contract documents, communicate about contract questions, track budget spenddown, and process invoices based on completion of deliverables. Finally, service delivery and outcome data collected through Apricot 360 will be available to external evaluators contracted by the City of Oakland to conduct an evaluation of DVP programs and services.

B. Authorized Use

Data stored in Apricot 360 will be accessed on a need-to-know and right-to-know basis, meaning that DVP and CBO staff members will only have to access information that is essential to their job function. Categories of Apricot 360 system usage are described below.

- **Service delivery:** Direct service and supervision staff employed by the DVP and contracted CBOs will use Apricot 360 to track information on client enrollment, contacts, progress towards milestones, accomplishments, referrals, and other aspects of service delivery. The system will identify upcoming staff member tasks related to service delivery and present summarized data on clients served though dashboards that are helpful to staff. Direct service staff include individuals such as case managers and life coaches who work directly with clients to deliver services or programming. Supervision staff are supervisors of direct service staff.

- **Violent incident crisis response coordination:** Violence interrupters employed through the DVP and contracted CBOs will receive information about shootings and homicides through Apricot 360 and enter information pertaining to their response. Select staff members within the DVP who coordinate the 24/7 response to shootings and homicides will review data entered by contracted CBOs pertaining to shooting and homicide response activities to ensure that victims and family members receive timely, comprehensive, and coordinated support services. These staff members will also use Apricot 360 to monitor and coordinate violence interruption activities to prevent retaliation.

- **Program monitoring and accountability:** DVP data and evaluation staff will use aggregate service delivery data to monitor trends in service delivery within activities and substrategies and ensure that summarized service delivery data are available to a range of external stakeholders, including councilmembers, committee members, grantors, and the public. DVP data and evaluation staff will also review individual-level client data within the group and gun violence strategy to determine how many clients are enrolled in multiple services, ensure that clients are not simultaneously enrolled in the same service through different providers, and ensure that services delivered to individual clients meet DVP expectations in terms of quality, frequency, duration, and reach.

- **Contract management:** Fiscal and contract staff employed by the DVP and contracted CBOs will use the system to manage grant budgets, monitor contract deliverables, process budget modifications and payments, and communicate about contracts.

- **External evaluation:** External evaluators contracted by the City of Oakland will use data from Apricot 360 to evaluate the effectiveness of services delivered by the DVP and contracted CBOs. Evaluators will seek and receive institutional review board (IRB) approval prior to commencing research activities. Once IRB approval is obtained, evaluators will 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 clients who do not sign a consent form, evaluators will receive deidentified or aggregate data.

C. Data Collection

Service delivery data will be entered into Apricot 360 by direct service staff employed by the DVP and contracted CBOs. For each activity funded through the DVP's three strategies, **Tables 1-3** identify which data entry forms will be completed. **Table 4** provides an overview of the types of data collected through each form.

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Table 1. Data entry forms completed in Apricot 360 for the DVP's group and gun violence strategy.

Substrategy	Activity	CET Outreach	Group activity: Attendance	Group activity: Description	Hospital response	Housing placement	Intake & needs assessment	Job placement: Employer profile	Job placement: Work experience	Life map goals and activities	Participant record	Program enrollment	Referral to services: Non-Participant	Referral to services: Participant	Relocation	Service notes	Triangle incident response	Violence mediation
Employment & Education Support Services	Adult employment & education		x	x				x	x		x	x		x		x		
	Youth job exploration & education		x	x				x	x		x	x		x		x		
School Site Violence Intervention & Prevention Teams	Community healing		x	x														
	Gender-based violence		x	x							x	x	x	x		x		
	Violence interruption													x		x		x
	Youth life coaching		x	x			x			x	x	x		x		x		
Violent incident crisis response	Emergency relocation										x	x		x	x	x		
	Family support										x	x		x	x	x		
	Hospital-based intervention				x													
	Violence interruption	x															x	
Youth Diversion and Youth & Adult Life Coaching	Adult life coaching		x	x			x			x	x	x		x		x		
	Adult life coaching: Housing					x					x	x		x		x		
	Youth diversion		x	x							x	x		x		x		x
	Youth life coaching		x	x			x			x	x	x		x		x		

Table 2. Data entry forms completed in Apricot 360 for the DVP's gender-based violence strategy.

Substrategy	Activity	Forms completed in Apricot 360 database												
		Group activity: Attendance	Group activity: Description	Housing placement	Intake & needs assessment	Job placement: Employer profile	Job placement: Work experience	Life map goals and activities	Mobile & bedside advocacy	Participant record	Program enrollment	Referral to services: Non-participant	Referral to services: Participant	Service notes
Crisis response	Bedside advocacy and accompaniment								x			x		
	24-hour hotlines		x									x		
Housing	Emergency shelter		x	x						x	x		x	x
	Transitional housing		x	x						x	x		x	x
Wrap-Around Services	Employment	x	x			x	x			x	x		x	x
	Legal advocacy									x	x		x	x
	Life coaching	x	x		x		x	x		x	x		x	x
	Safe space alternatives	x	x									x		
	Therapeutic support	x	x							x	x		x	x

Table 3. Data entry forms completed in Apricot 360 for the DVP's community healing strategy.

Substrategy	Forms completed in Apricot 360 database								
	Group activity: Attendance	Group activity: Description	Mini grant	Participant record	Program enrollment	Referral to services: Non-participant	Referral to services: Participant	Service notes	Violence mediation
Healing/restorative activities	x	x		x	x	x	x	x	x
Community capacity building and mini grants		x	x						
Neighborhood and community teams		x					x		x
Therapeutic supports for family/community	x	x		x	x		x	x	
Town Nights		x							

Table 4. Data collected through Apricot 360 forms.

Form	Data fields
Community engagement team (CET) outreach	1. Date, method, and outcome of all outreach attempts
Group activity: Attendance	1. Start and end time of activity 2. Participant attendance (present or absent)
Group activity: Description	1. Date, location, and duration of activity 2. Number of people in attendance 3. Type of activity (e.g. training, support group)
Housing placement	1. Dates housed 2. Housing type (e.g. permanent, transitional, shelter)
Job placement: Employer profile	1. Name of employer 2. Contact information for employer 3. Type of employment field
Job placement: Work experience	1. Dates employed 2. Wages at beginning and end of employment 3. Weekly hours worked at beginning and end of employment 4. Type of employment (subsidized vs. permanent)
Mobile & bedside advocacy	1. Date and time of contact 2. Basic demographic information (age, gender, race) 3. Yes/No: Was safety plan developed?
Hospital response	1. Date and time of initial notification 2. Date and time of visits for service 3. Initials of individual visited 4. Type of support provided (e.g. VOC applications, relocation funding)
Life map goals and activities	1. Case plan goals 2. Planned and accomplished actions associated with goals 3. Start dates, completion dates, and current progress 4. Date and amount of financial incentives provided for completion of life map goals
Mini grant	1. Grant amount, term, and recipient 2. Activities planned with grant 3. Number of people served through grant
Participant record	1. Name and date of birth[*] 2. Contact information[*] 3. Demographic information (race, gender, education, language spoken at home) 4. Employment status 5. Housing status 6. School information, if applicable 7. Names and contact information of important people, if client chooses to provide (e.g. probation officer)
Program enrollment	1. Date and source of referral 2. Dates of enrollment and exit 3. Type of program 4. Reason for exit
Intake and needs assessment	1. Date of intake and needs assessment 2. Questions related to quality of life and support needs
Service notes	1. Date and duration of meeting with client by service provider 2. Notes on visit

Form	Data fields
Referral to services: Participant	1. Date of referral 2. Type of service referral 4. Name of organization referred to 5. Status of referral (e.g. sent, received, accepted, denied)
Referral to services: Non-participant	1. Date of referral 2. Type of service referral 3. Name of organization referred to 4. Status of referral (e.g. sent, received, accepted, denied)
Relocation	2. Number of individuals in the family 3. Yes/No: Was safety assessment conducted? 5. Date and result of request for relocation support/funding
Triangle incident response	1. Date and time of notification 2. Date and time of scene or hospital response 3. Assessment: Person impacted initials and demographics, category of incident, homicide (yes/no), level of retaliation 4. Notes on follow-up and referral
Violence mediation	1. Date and time of mediation conversations 2. Number of individuals involved in conversations 3. Type of mediation: proactive vs. retaliation 4. Other people notified of conflict (e.g. family members, school administrators)

[*]This field is only applicable for activities that require entry of personally-identifiable information.

For each strategy and activity, **Tables 5-7** identify whether CBOs will be expected to enter individual-level client records and personally-identifiable information (PII). PII is any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used to deanonymize previously anonymous data is considered PII. In situations where individual client records are required but PII is not, agencies will be able to leave the first and last name fields blank.

Tables 5-7 also identify whether select DVP staff (described under *Data Access*) will be able to view individual-level client records and PII for purposes of data quality assurance, process evaluation, and service coordination. For minor clients whose parent/guardian do not consent to share information with the DVP, CBOs will have the option of using unique identifiers in lieu of PII. Unique identifiers are numeric codes that link to a key with client names and dates of birth by CBOs outside the Apricot 360 database. Evaluation of CBOs in the DVP network 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. As is current policy, CBOs are required to submit ancillary data during an onsite program monitoring visit to ensure that the service delivery and outcomes, for which DVP has contracted, are accurately reflected and are being achieved.

Table 5. Entry and visibility of individual-level client records and PII for the DVP's group and gun violence strategy.

Substrategy	Activity	Are individual client records entered?	Is PII entered?	Are individual records and PII entered by CBOs visible to DVP staff?
Employment & Education Support Services	Adult employment & education services	Yes	Yes	Yes
	Youth job exploration & education services	Yes	Yes	Yes
School Site Violence Intervention & Prevention Teams	Community healing	No	No	No
	Gender-based violence: Individual-level services	Yes	Provider choice	No
	Gender-based violence: Group services	No	No	No
	Violence interruption	Yes	Yes	Yes
	Youth life coaching	Yes	Yes	Yes
Violent incident crisis response	Emergency relocation	Yes	Yes	Yes
	Family support following homicide	Yes	Yes	Yes
	Hospital intervention	Yes	No	No
	Violence interruption	Yes	No	No
Youth Diversion and Youth & Adult Life Coaching	Adult life coaching	Yes	Yes	Yes
	Housing-focused case management	Yes	Yes	Yes
	Youth diversion: Individual-level services	Yes	Yes	Yes
	Youth diversion: Group-level services	No	No	No
	Youth life coaching	Yes	Yes	Yes

Table 6. Entry and visibility of individual-level client records and PII for the DVP's gender-based violence strategy.

Substrategy	Activity	Are individual client records entered?	Is PII entered?	Are individual records and PII entered by CBOs visible to DVP staff?
Crisis response	Bedside advocacy and accompaniment	Provider choice	Provider choice	No
	24-hour hotlines	No	No	No
Housing	Emergency shelter: Hotel vouchers	Yes	Provider choice	No
	Emergency shelter: Relocation	Yes	Provider choice	No
	Transitional housing	Yes	Provider choice	No
Wrap-Around Services	Employment support: Individual services	Yes	Provider choice	No
	Employment support: Group services	No	No	No
	Legal advocacy	Yes	Provider choice	No
	Life coaching	Yes	Provider choice	No
	Safe space alternatives	Provider choice	Provider choice	No
	Therapeutic support: Individual services	Yes	Provider choice	No
	Therapeutic support: Group services	No	No	No

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Table 7. Entry and visibility of individual-level client records and PII for the DVP's community healing strategy.

Substrategy	Are individual client records entered?	Is PII entered?	Are individual records and PII entered by CBOs visible to DVP staff?
Restorative services	No	No	No
Mini grants	No	No	No
Neighborhood and community teams	No	No	No
Therapeutic supports: Individual-level services	Yes	Provider choice	No
Therapeutic supports: Group-level services	No	No	No
Town Nights	No	No	No

For activities that collect PII, regardless of visibility to DVP staff, CBOs will be encouraged to notify clients that their name and date of birth will be documented in Apricot 360 for purposes of effective service delivery and coordination. Clients will also be asked to sign 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 clients will be able to decline having their PII accessed by a third-party evaluator if they wish.

D. Data Access

The DVP will take special care to ensure that data within Apricot 360 are accessed on a need-to-know and right-to-know basis, meaning that staff will only be able to access information that is essential to their job function. Apricot 360 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:

Contracted CBOs

- ▪ *Direct service staff and supervisors* will have access to individual- and group-level service delivery data entered by members of their agency only. Direct service staff and supervisors will NOT have access to service-delivery data for clients being served by other agencies, even if they are the same clients.

- ▪ *Fiscal and contract staff* will have access to contract and fiscal documents such as budgets, scopes of work, invoices, and payments for their agency only. These staff members will also have access to aggregate service delivery data pertaining to contract deliverables, which will be automatically calculated based on data entered by direct service staff. Fiscal and contract staff will not have access to individual client records or PII.

DVP

- ▪ *Direct service staff and supervisors* will have access to individual- and group-level service delivery data entered by members of the DVP only. Direct service staff and supervisors within

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the DVP will NOT have access to service-delivery data for clients being served by other agencies, even if they are the same clients.

- ***Violent incident crisis response coordination staff*** will have access to data entered by staff within the DVP and contracted CBOs pertaining to the violence incident crisis response substrategy to ensure timely coordination of support services and violence interruption activities to prevent retaliation.

- ***Fiscal and contract staff*** will have access to contract and fiscal documents such as budgets, scopes of work, invoices, and payments for all grantees. These staff members will also have access to aggregate service delivery data pertaining to contract deliverables, which will be automatically calculated based on data entered by direct service staff. Fiscal and contract staff will not have access to individual client records or PII.

- ***Data and evaluation staff within the DVP*** will have access to client-level data and PII for DVP clients across all substrategies. For clients engaged by contracted CBOs, DVP data and evaluation staff will also have access to client-level data and PII for activities within the group and gun violence strategy for the purpose of identifying and remediating issues related to service delivery within or across CBOs.

- ***External data and evaluation staff*** employed by evaluation firms contracted by the City of Oakland will have access to PII for clients who have previously consented to having their PII shared with an external evaluator. For clients who have not consented to having their PII shared, external evaluation firms will only receive access to deidentified or aggregate service delivery data. All data shared with external evaluators will be downloaded from Apricot 360 by Bonterra technical support staff and shared via a secure file transfer method.

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 360 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 360 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 360 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 360 servers do so via a secure HTTPS connection. More information on privacy and security for the Apricot 360 system is included in **Attachment A.**

F. Data Retention

Agencies that collect PII for clients based on their funded activities will be 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 will 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 360 unless exempted due to legal requirements.

G. Public Access

There will be absolutely no public access to individual-level client data in Apricot 360. 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 (e.g. how many participants were served in a year). Aggregate data from Apricot 360 will be 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

Outside of the DVP, DVP-funded CBOs, and evaluation firms contracted by the City of Oakland, no other agency will have access to data collected in Apricot 360. External evaluators contracted by the City of Oakland will use data in Apricot 360 to evaluate the effectiveness of funded programs. External evaluators will only have access to PII for individuals who sign a consent form allowing their PII to be shared with a third-party evaluator. For clients who do not sign a consent form allowing access to their PII, external evaluators will receive deidentified or aggregate data.

I. Training

The DVP's data and evaluation staff will attend Apricot 360 train-the-trainer and custom end user training sessions, which will review Apricot 360's configuration and tips and tricks for training end users. In addition, DVP staff will have access to the Apricot basic training package, which includes unlimited access to the following:

- Live Apricot setup webinar
- Live Apricot insights webinar
- Administrative video library
- End user training library

Using these tools, the DVP's data and evaluation staff will train direct service staff, supervisors, and contract and fiscal staff within the DVP and contracted CBOs on how to use Apricot 360. This will include general trainings, trainings specific to substrategies and activities, and ongoing options for one-on-one training, support, and technical assistance. All trainings will specify appropriate usage of the system pertaining to data privacy and security as outlined in this use policy, and all trained staff members will sign a copy of the use policy indicating that they have read and understand it. Trainings will 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.

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Additionally, all staff within the DVP who have access to client-level data and PII entered into Apricot 360 by contracted CBOs will maintain current certifications in HIPAA and Collaborative Institutional Training Initiative (CITI) research, ethics, and compliance training.

J.   Auditing and Oversight

The DVP's data and evaluation staff will 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. On a quarterly basis, the DVP's data and evaluation staff will receive these logs from Apricot 360 administrators and review them for any signs of inappropriate system usage. Any indication of inappropriate system usage will be 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

Within one (1) year of the adoption of this Use Policy, DVP shall return to the Privacy Advisory Commission and, subsequently to the City Council, which may include the Public Safety Committee, for an evaluation. Such evaluation shall include, but not be limited to, what data was collected, how it was used, consent rates of contracted CBOs, and any recommended changes such as to data collection for minor clients and future scoring, funding levels, or other actions related to consent rates of contracted CBOs.

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