

2022-102 AUDIT SCOPE AND OBJECTIVES
California Department of Public Health—
Sexual Orientation and Gender Identity Data Collection

The audit by the California State Auditor will provide independently developed and verified information related to the California Department of Public Health's (Public Health) procedures for collecting, reporting, and using sexual orientation and gender identity (SOGI) data. The audit's scope will include, but not be limited to, the following activities:

1. Review and evaluate the laws, rules, and regulations significant to the audit objectives.
2. Identify the programs within Public Health that are actively collecting SOGI data and determine the following:
 - (a) The processes each program used to establish data collection methodologies.
 - (b) The extent to which the programs have different methodologies for collecting and tracking the data.
 - (c) Public Health's compliance with AB 959, including its use of SOGI data.
 - (d) The extent to which each program performs monitoring to ensure the appropriateness of the data collection.
3. Identify the following information regarding entities whose contracts with Public Health require collecting SOGI data:
 - (a) The total number of contracted entities.
 - (b) To the extent possible, the methodologies Public Health used to negotiate these contracts.
 - (c) Whether Public Health established and followed specific processes to monitor the data collected by these entities.
 - (d) The methods by which Public Health communicates changes in law relating to SOGI data collection.
4. Determine the following information regarding health care providers and laboratories:
 - (a) Identify the procedures that Public Health has in place to ensure and facilitate the solicitation of SOGI data from health care providers and laboratories.
 - (b) Identify the barriers that the State experiences when attempting to collect SOGI data from health care providers and laboratories.
 - (c) Identify the current limitations or deficiencies related to SOGI data collection within electronic disease reporting systems used by both health care providers and laboratories and determine how these systems can be improved.

5. Identify the following information regarding health care providers collecting SOGI data from patients with reportable communicable diseases:
 - (a) The measures Public Health has taken to ensure that all health care providers are collecting and reporting SOGI data in compliance with SB 932 and how these measures can be improved.
 - (b) To the extent possible, the different methods used to collect SOGI data and how these methods can be improved.
6. Review and assess the processes by which Public Health interacts with laboratories that receive SOGI data from health care providers and determine whether there are challenges in those interactions related to the collection of data and, if so, determine how these challenges can be addressed.
7. Review and assess the processes by which Public Health interacts with drive-through or pop-up COVID-19 testing sites that collect SOGI data and determine whether there are challenges in those interactions related to the collection of data and, if so, determine how these challenges can be addressed.
8. Determine the extent to which Public Health provides uniform guidance to local county health departments, laboratories, and contractors regarding the collection of SOGI data, including whether specific guidance is provided to laboratories regarding action to take after they receive SOGI data from health care providers. Identify the reasons for any lack of guidance. Further, identify examples of unified guidance that sources outside of Public Health use that could become a model for the entities that the law requires to collect SOGI data.
9. Determine whether any efforts are being made to collect SOGI data for the administration of the COVID-19 vaccine. If no efforts have been taken, determine the reasons why.
10. Review and evaluate the following:
 - (a) The collection of SOGI data compared to the collection of data on race and ethnicity to determine whether similar difficulties exist.
 - (b) The collection of SOGI data in rural areas compared to the collection of SOGI data in urban areas to determine whether major differences exist.
11. Determine whether any Public Health programs or other state agencies are conducting SOGI data collection particularly well. Further, identify any local health jurisdictions that report SOGI data to Public Health particularly well and determine whether other entities that collect these data could adopt these best practices.
12. To the extent possible, review and compare SOGI data retained before and after the passage of AB 959 to determine if a quantifiable difference can be identified.
13. Review and assess any other issues that are significant to the audit.