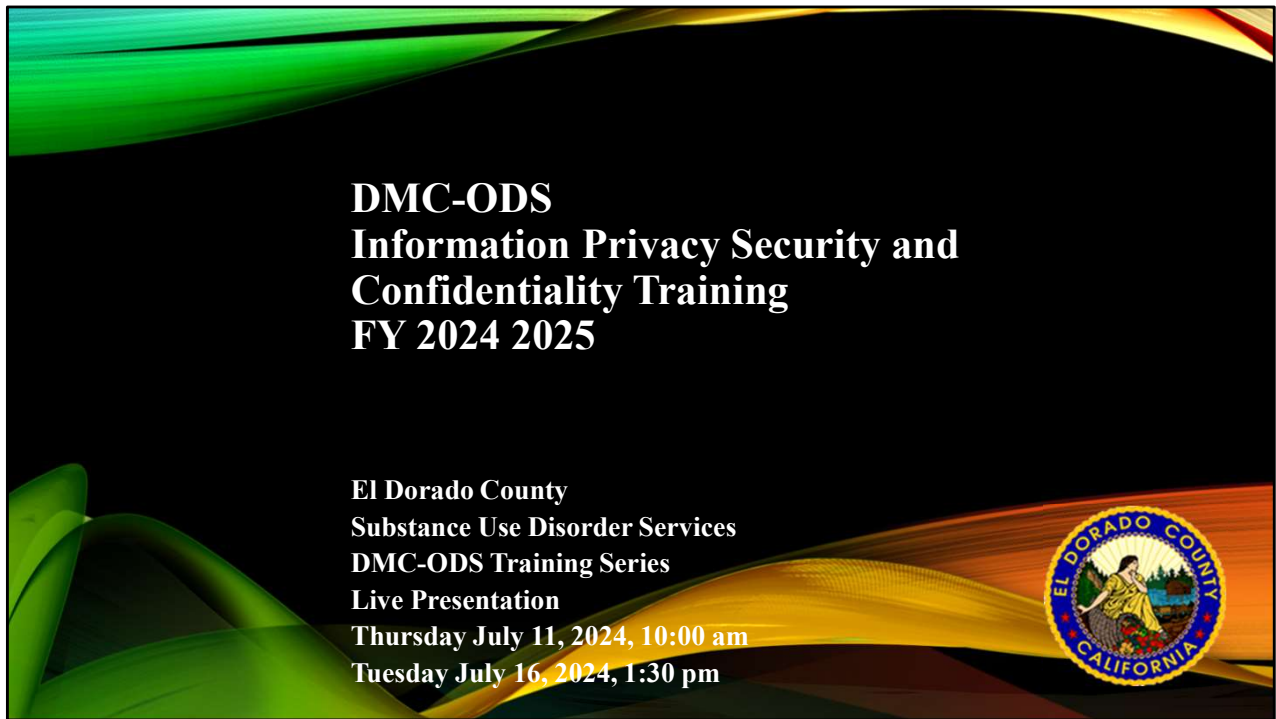


Hello everyone. Thanks for coming.

This presentation will be taped and posted to the EDC SUDS webpage under trainings and the PPT will be sent out later this week to anyone who requests a copy.

For those of you who are attending this live presentation, no exam will be required.

For those of you viewing this presentation On-Demand, an exam will need to be completed. Passing the exam required answering at least 7 of the 10 questions correct. The instructions for requesting the exam are on the EDC SUDS website Training Tab.



(Start recording)

Welcome to another El Dorado County Substance Use Disorder Services DMC-ODS Quality Assurance Training Series presentation. Today we will be discussing DMC-ODS Information Privacy and Security and Confidentiality.

This training includes General Use, Security and Privacy Safeguards, Unacceptable Use, and Enforcement Policies applicable to the EDC DMC-ODS Provider Network workforce. Each workforce member shall sign a "Confidentiality Statement Form" & "Privacy and Security Training Certification & Compliance Agreement Form" outlining their role and responsibilities to protect the privacy of EDC SUDS clients. Participation in this training and submission of the signature forms to EDC DMC-ODS are required at the time of hire and then on an annual basis. We will cover these forms towards the end of this presentation.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

Privacy and  
Confidentiality  
Of  
Client Information

This training will cover El Dorado County Health and Human Services Agency Policy # A-HH-012-Privacy and Confidentiality Of Client Information-Adopted 4/25/18 and Revised 7/20/20.

Confidentiality is a cornerstone of any treatment relationship. For people receiving SUD treatment, strict confidentiality protections mean that you can share information about past and current drug use without worrying that it will be used against you by the police or a landlord, employer, judge, or social worker. For people considering whether to enter treatment, studies consistently show that confidentiality and privacy are major considerations.

At the end of this training, participants will have the knowledge necessary to understand the following:

1. Privacy and Confidentiality of Client Information requirements for El Dorado County workforce members
2. General Use
3. Security and Privacy Safeguards
4. Unacceptable Use and Enforcement Policies
5. Confidentiality and ethical behavior

# EL DORADO COUNTY HEALTH AND HUMAN SERVICES AGENCY POLICY # A-HH-012

El Dorado County Health and Human Services Agency Policy and Procedure	
PRIVACY AND CONFIDENTIALITY OF CLIENT INFORMATION	Policy Number: A-HH-012
	Date Adopted: 4/25/18
Approved By: Dan Seema, Director	Date Revised: 7/20/20
	Page Number: 1 of 3

**PURPOSE**

This policy outlines the manner in which workforce members of the El Dorado County Health and Human Services Agency (HHS) will meet the requirements of Code of Federal Regulations (CFR) 45, Part 194, known as the Health Insurance Portability and Accountability Act of 1996 (HIPAA), any general privacy and security policy/procedure adopted by the County Board of Supervisors and applicable state and federal regulation governing general privacy protections. The content of this policy provides the general requirements and expectations for the necessary collection, use, and disclosure of protected health information (PHI) and personally identifiable information (PII) about individuals in order to provide services and benefits to individuals, while maintaining reasonable safeguards to protect the privacy of sensitive information. This policy is applicable to all divisions, units, programs and covered HIPAA operations within HHS.

Additional privacy requirements and restrictions related to the confidentiality of substance use disorders, mentally and developmentally afflicted persons, recipients of assistance as defined by the Centers of Medicare and Medicaid Services (CMS) and individuals identified as having communicable diseases are addressed through appendices and specific procedure in this policy. The conditions of privacy protection for the client categories identified above are addressed in the California Confidentiality of Medical Information Act, Lanterman-Petite-Short (LPS) Act, 42 CFR Part 2 Confidentiality of Substance Use Disorder Patient Records, applicable California Welfare and Institution Code (WIC) and as reflected in supplemental agreements executed with the California Department of Social Services, California Department of Health Care Services or California Department of Public Health.

Here is the first page of El Dorado County Health and Human Services Agency Policy # A-HH-012-Privacy and Confidentiality Of Client Information-Adopted 4/25/18 and Revised 7/20/20.

A copy of the form can be emailed upon request after the training.

For those of you watching this training on-demand, this Policy can be obtained via the Substance Use Disorder Services Training Information tab of the El Dorado County Substance Use Disorder Services <https://www.eldoradocounty.ca.gov/Health-Well-Being/Behavioral-Health/Substance-Use-Disorder-Services-SUDS/SUD-Training>



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Purpose

Workforce members of the El Dorado County Health and Human Services Agency (HHS) will meet the requirements of Code of Federal Regulations (CFR) 45, Part 164, known as the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

This policy outlines the manner in which workforce members of the El Dorado County Health and Human Services Agency (HHS) will meet the requirements of Code of Federal Regulations (CFR) 45, Part 164, known as the Health Insurance Portability and Accountability Act of 1996 (HIPAA), any general privacy and security policy/ procedures adopted by the County Board of Supervisors and applicable state and federal regulation governing general privacy protections.

The content of this policy provides the general requirements and expectations for the necessary collection, use, and disclosure of protected health information (PHI) and personally identifiable information (PII) about individuals in order to provide services and benefits to individuals, while maintaining reasonable safeguards to protect the privacy of sensitive information. This policy is applicable to all divisions, units, programs and covered HIPAA operations within HHS.

Workforce members include all EDC DMC-ODS Contracted Providers, be they EDC staff or contracted agency staff.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Purpose

California Confidentiality of Medical Information Act  
Lanterman-Petris-Short (LPS) Act  
42 CFR Part 2 Confidentiality of Substance Use Disorder Records

Additional privacy requirements and restrictions related to the confidentiality of substance use disorders, mentally and developmentally afflicted persons, recipients of assistance as defined by the Centers of Medicare and Medicaid Services (CMS) and individuals identified as having communicable disease are addressed through appendices and specific procedure to this policy. The conditions of privacy protection for the client categories identified above are addressed in the California Confidentiality of Medical Information Act, Lanterman- Petris-Short (LPS) Act, 42 CFR Part 2 Confidentiality of Substance Use Disorder Patient Records, applicable California Welfare and Institution Code (WIC) and as reflected in supplemental agreements executed with the California Department of Social Services, California Department of Health Care Services or California Department of Public Health.

Workforce members of HHSA should defer to California law or other federal law when privacy protections or information sharing restrictions are greater than required by HIPAA. In these circumstances the designated privacy official within HHSA should be contacted anytime clarification is needed.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

# Policy

## How information is defined

For the purpose of this policy, the terms "personal information" (PI), "personally identifiable information," (PII), "confidential information", "health confidential information", "individual health confidential information", "protected health confidential information", "protected health information", (PHI), and "electronic protected health information", (ePHI) are the same.

Which brings us to some definitions.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Meanings and application of terms

"personal information" (PI), "personally identifiable information," (PII), "confidential information", "health confidential information", "individual health confidential information", "protected health confidential information", "protected health information", (PHI), and "electronic protected health information", (ePHI)---The meanings and application of these terms include but are not limited to:

- A subset of confidential information, including information collected, created, received, maintained, or transmitted by HHS that identifies or describes an individual by use of but not limited to name, social security number, physical description, home address, home telephone number, education, financial matters, medical and or employment history.;
- Relates to the past, present, or future physical or mental health condition of an individual;
- The provision of physical or mental health care to an individual;
- The provision of public assistance services;
- The past, present, or future payment for the provision of health care to an individual;
- Identifies the individual or the confidential information creates a reasonable basis to believe it can be used to identify the person;



- Confidential information transmitted by electronic media, maintained in electronic, media and transmitted or maintained in any other form or medium



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## General Requirements

HHSA will safeguard PHI and PII about individuals

HHSA will inform individuals about the County of El Dorado's HHSA privacy practices

HHSA shall provide training to all workforce members

All workforce members of HHSA will safeguard PHI and PII about individuals and may collect, maintain, use, transmit, share and/or disclose confidential information about individuals to the extent needed to administer HHSA programs, services and activities.

All workforce members of HHSA will inform individuals about the County of El Dorado's HHSA privacy practices and respect individual privacy rights, in accordance with this policy.

The County of El Dorado and/or HHSA shall provide training to all workforce members in programs meeting the definition of "covered entity" or "health care component" as noted herein and shall require every workforce member to sign a County of El Dorado "HIPAA Privacy & Security Policy & Procedures Acknowledgement Form" outlining their role and responsibilities to protecting the privacy of HHSA clientele.

The County of El Dorado Health and Human Services Agency has adopted reasonable policies and procedures for administration of its programs, services and activities. If any state or federal law or regulation, or order of a court having appropriate jurisdiction, imposes a stricter requirement upon any HHSA policy regarding confidential information or safeguarding of protected information, HHSA workforce members shall act in accordance with that stricter standard.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## General Requirements

HHSA workforce members will seek guidance

Workforce members of HHSA will defer to the County of El Dorado  
HIPAA Security Rule Policy and Procedures

In the event that more than one policy applies but compliance with all such policies cannot reasonably be achieved HHSA workforce members will seek guidance according to established HHSA policy and procedures.

Workforce members of HHSA will defer to the County of El Dorado HIPAA Security Rule Policy and Procedures for the protection, safeguarding and integrity of individually identified health information collected or maintained in electronic format.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Safeguarding Confidential Information

Workforce members shall respect and protect the privacy of records, PHI and PII of clients  
All protected health information concerning HHSa clients must be safeguarded

Workforce members and business associates of HHSa shall respect and protect the privacy of records, PHI and PII of clients who request or receive services from the County. This includes, but is not limited to:

- Applicants or enrollees in an HHSa program or service;
- Minors and adults receiving alcohol and drug, mental health, preventive health, public health and public assistance services from HHSa;
- Persons who apply for or are admitted to a county operated or county funded mental health center.

All protected health information concerning HHSa clients must be safeguarded in accordance with any privacy and security policies procedures or directives as adopted by the El Dorado County Board of Supervisors or designee



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Safeguarding Confidential Information

All protected health information concerning HHSA clients must be safeguarded in accordance with any privacy and security policies procedures or directives as adopted by the El Dorado County Board of Supervisors or designee.

The workforce of HHSA shall not use or disclose protected health information unless:

- The client has explicitly authorized use or disclosure of protected information in accordance with County and HHSA policy and procedure, or
- The use or disclosure is specifically permitted under County of El Dorado Policy, federal and state law.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Notice of Privacy Practices

The "Notice of Privacy Practices" for HHSa will be made available to any client applying for or receiving services.

The "Notice of Privacy Practices" for HHSa will be made available to any client applying for or receiving services. The "Notice of Privacy Practices" shall contain all information required under federal regulations specific to protected health information defined by HIPAA, all applicable state and federal information pertaining to PII, confidentiality of substance use disorders, mentally and developmentally afflicted persons and recipients of assistance as defined by the Centers of Medicare and Medicaid Services (CMS)

Where a service is rendered by an HHSa health care provider the "Notice of Privacy Practices, Acknowledgement of Receipt" shall be acquired from each client at the first service delivery or as soon as practicable.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Client Privacy Rights

### The right to inspect and obtain a copy of his or her PHI

Recipients of HHSA services or their "Personal Representative" have the right to inspect and obtain a copy of his or her PHI in a designated record set. Workforce members of HHSA will honor a written request for inspection or copy as noted in the "Notice of Privacy Practices". Certain exceptions to an individual's right of access are allowed by law. The specific process for accessing the designated record set and exceptions to access are addressed in the procedure section of this policy.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

Use and Disclosures of Protected Health Information

Signed authorization for release of information

Workforce members of HHSa shall not use or disclose any PHI, PII or other confidential information concerning a client related to, HIPAA covered health care components, behavioral and substance use disorder or public assistance service recipients without a signed authorization for release of information from the individual, or the individual's personal representative, *unless* authorized by this policy, or as otherwise allowed in the procedure section of this policy.





EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Minimum Necessary Standard

Use or disclose only the minimum amount  
of confidential information necessary

Workforce members of HHSA will use or disclose only the minimum amount of confidential information necessary to provide services and benefits to clients, and only to the extent provided in County of El Dorado Privacy policies and procedures. When using or disclosing an individual's PHI, PII or other confidential information or when requesting an individual's confidential information from a provider or health plan, HHSA Workforce members must make reasonable efforts to limit the amount of protected health information to the minimum necessary needed to accomplish the intended purpose of the use, disclosure, or request. The specific application of the "Minimum Necessary Standard" is outlined in the procedure section of this policy.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Minimum Necessary Standard

### EXCEPTIONS

This standard does not apply to:

- Disclosures to or requests by a health care provider for treatment;
- Uses or disclosures made to the individual;
- Uses or disclosures authorized by the individual;
- Disclosures made to the Secretary of the United States Department of Health and Human Services in accordance with federal HIPAA regulations at 45 CFR 160, Subpart C;
- Uses or disclosures that are required by law;
- Uses or disclosures required for compliance with federal HIPAA regulations at 45 CFR, Parts 160 and 164.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Administrative, Technical and Physical Safeguards

Safeguard protected health information from any intentional or unintentional use or disclosure

Workforce members of HHSa must take reasonable steps to safeguard protected health information from any intentional or unintentional use or disclosure, as outlined in County of El Dorado Privacy Policy and County of El Dorado HIPAA Security Rule Policy and Procedures.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

Use and Disclosures for  
Research Purposes and Waivers

When the County is acting as a Public Health Authority

Workforce members of HHSa may use or disclose an individual's PHI and confidential information for research purposes or when the County is acting as a Public Health Authority with and without an individual's authorization. Specific allowable uses and disclosures of PHI for these purposes are addressed in County of El Dorado Privacy Policy Section "Uses and Disclosures for Research Purposes and Waivers".



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## De-Identification of Protected Health Information and Use of Limited Data Sets

Workforce members of HHSA will follow standards under which client PHI, PII may be used and disclosed if information that can identify a person has been removed (de identified) or restricted to a limited data set. Unless otherwise restricted or prohibited by additional federal or state law, protected information may be used and shared as appropriate for business purposes without further restriction, if the PHI has been de identified by the County or interested party. The means of de-identifying confidential information are outlined in the procedure section of this policy.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Business Associate Relationships

Workforce members of HHSa may disclose protected health information, PII and other service-related information to business associates with whom there is a written contract or memorandum of understanding as outlined in County of El Dorado HIPAA Privacy Policy "Business Associates". Business Associates and their subcontractors have responsibilities under HIPAA to protect and safeguard client PHI.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

**Enforcement, Sanctions and Penalties  
for Violations of Individual Privacy**

**All must guard against improper uses or disclosures of  
client information**

All workforce members, including contract employees, volunteers, interns and members of HHSA must guard against improper uses or disclosures of County of El Dorado client information. County of El Dorado must apply appropriate sanctions against members of its workforce as outlined in County of El Dorado Privacy Policy, "Enforcement, Sanctions, and Penalties".



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

# The Ethics of Confidentiality

Confidentiality is a cornerstone of any treatment relationship. For people receiving SUD treatment, strict confidentiality protections mean that you can share information about past and current drug use without worrying that it will be used against you by the police or a landlord, employer, judge, or social worker. For people considering whether to enter treatment, studies consistently show that confidentiality and privacy are major considerations.

Any verbal, written, recorded or electronic information that identifies or can identify a beneficiary is considered Protected Health Information (PHI). All EDC DMC-ODS Provider Network programs and staff must comply with state and federal laws and regulations regarding informed consent, disclosure of confidential information such as patient-identifying information pursuant to the requirements of 42CFR Part 2 which govern the confidentiality of SUD records, and protect SUD related information of all beneficiaries.





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HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Ethical Behavior

The duty to protect privileged information and to share entrusted information responsibly

What does confidentiality mean regarding ethics?

Confidentiality refers to **the duty to protect privileged information and to share entrusted information responsibly**. It stems from the notion that a person's wishes, decisions, and personal information should be treated with respect.

In the next several slides we will look at individual codes of ethics as related to Confidentiality.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

California SUD Counselor  
Uniform Code of Conduct

Principle 3

Confidentiality is covered under Principle 3 of the California SUD Counselor Uniform Code of Conduct

Registrants and Certified AOD counselors shall comply with all Federal and State Laws and Regulations that pertain to patient/client confidentiality, mandated reporting exceptions, record keeping requirements and patient/client records access.

a. Violating client/patient confidentiality except as required or permitted by law including, but not limited to, Title 42 Code of Federal Regulations Part 2, Child Abuse, Elder Abuse and Public Safety laws and Regulations;



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

CADTP Confidentiality

Section 15

Confidentiality is covered under Section 15 of the California Association of DUI Treatment Programs Code of Ethics.

I shall protect any program participant's, any patient's, or any resident's right to confidentiality, and I shall not fail to maintain confidentiality, except as otherwise required or permitted by law, including but not limited to the Code of Federal Regulations, Title 42, Part 2, as well as any applicable "Notice of Privacy" regulatory requirements required by the Health Insurance Portability & Accountability Act of 1996 [HIPAA].



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## CCAPP Confidentiality

### Principal 3

Confidentiality is covered under Principal 3 of the California Consortium of Addiction Programs and Professionals Code of Conduct for Credentialed Alcohol and Drug Professionals.

Credentialed AOD professionals shall comply with all Federal and State Laws and Regulations that pertain to patient/client confidentiality, mandated reporting exceptions, record keeping requirements and patient/client records access.

Credentialed AOD counselors are prohibited from: a. Violating client/patient confidentiality except as required or permitted by law including, but not limited to, Title 42 Code of Federal Regulations Part 2, Child Abuse, Elder Abuse and Public Safety laws and Regulations;



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

CAADE Confidentiality

Principal 7

Confidentiality is covered under Principal 7 Sections A-E of the Addiction Counselor Certification Board of California/the California Association for Drug/Alcohol Educators code of ethics.

The Registrant or AOD Counselor working in the best interest of the client shall embrace, as a primary obligation, the duty of protecting client's rights under confidentiality and shall not disclose confidential information acquired in teaching, practice, or investigation without appropriately executed consent.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## MFT Confidentiality

### Standard II

Confidentiality is covered under STANDARD II of the American Association for Marriage and Family Therapy Code of Ethics.

Marriage and family therapists have unique confidentiality concerns because the client in a therapeutic relationship may be more than one person. Therapists respect and guard the confidences of each individual client.

- 2.1 Disclosing Limits of Confidentiality.
- 2.2 Written Authorization to Release Client Information.
- 2.3 Client Access to Records.
- 2.4 Confidentiality in Non-Clinical Activities.
- 2.5 Protection of Records.
- 2.6 Preparation for Practice Changes.
- 2.7 Confidentiality in Consultations.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## NASW Confidentiality

### Sub-section 1.07

By far, the most extensive of the Codes, covering 18 separate points of view. As such we will just review a couple of NASW points:

**1.Social workers should respect clients' right to privacy.** Social workers should not solicit private information from clients unless it is essential to providing services or conducting social work evaluation or research. Once private information is shared, standards of confidentiality apply.

**2.Social workers may disclose confidential information when appropriate with valid consent from a client** or a person legally authorized to consent on behalf of a client.

**3.Social workers should protect the confidentiality of all information obtained in the course of professional service,** except for compelling professional reasons. The general expectation that social workers will keep information confidential does not apply when disclosure is necessary to prevent serious, foreseeable, and imminent harm to a client or other identifiable person. In all instances, social workers should disclose the least amount of confidential information necessary to achieve the desired purpose; only information that is directly relevant to the purpose for which the disclosure is made should be revealed.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Physician Confidentiality

### Section 4

Confidentiality for physicians is covered under the Principles of Medical Ethics of the American Medical Association (AMA) Section 4.

A physician shall respect the rights of patients, colleagues, and other health professionals, and shall safeguard patient confidences and privacy within the constraints of the law.





EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

TAP 21

Section 2 Viii

There are two relevant sections of the SAMHSA *Technical Assistance Publication (TAP) Series 21* Addiction Counseling Competencies The Knowledge, Skills, and Attitudes of Professional Practice to draw from. Under section 2-Viii. Professional and Ethical Responsibilities

Competency 115 states

Adhere to established professional codes of ethics that define the professional context within which the counselor works to maintain professional standards and safeguard the client.

Competency 116 states

Adhere to Federal and State laws and agency regulations regarding the treatment of substance use disorders.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

William White has thoughts

Special attention to the issue of confidentiality

Renowned Addiction professional William White has some thoughts that are worth knowing about Confidentiality.

“Special procedures (federal and state statutes) have been developed to assure the confidential nature of addiction counseling. 10 textbooks and major journals in the addictions field have paid special attention to the issue of confidentiality. It is the responsibility of every addictions counselor to clearly inform every client of the scope and exceptions to confidentiality and to rigorously adhere to these boundaries.”



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POLICY # A-HH-012

## Confidentiality

### Wrapping up

Beneficiary PHI protection is everyone's responsibility. When in doubt, consult your co-workers and supervisors and managers.

Remember, when it comes to our clients, it is best to do no harm. As such, if it does not feel right, it probably isn't.

We all must always remember and never forget that Information Privacy and Security & Confidentiality is a cornerstone of any treatment relationship. For people receiving SUD treatment, strict Privacy and Security & Confidentiality protections mean that clients can share information about past and current drug use without worrying that it will be used against them by the police or a landlord, employer, judge, or social worker.

A violation of this can and will have adverse consequences. Keep that in mind.



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Monitoring Standard

Confidentiality Statement

Privacy and Security Training Certification  
& Compliance Agreement

As stated in **Health and Human Services Agency Privacy and Confidentiality of Client Information Policy A-HH-012, page 4**, “The County of El Dorado and/or HHS shall provide training to all workforce members in programs meeting the definition of "covered entity" or "health care component" as noted herein and shall require every workforce member to sign a County of El Dorado "Confidentiality Statement Form“ & “Privacy and Security Training Certification & Compliance Agreement Form” outlining their role and responsibilities to protecting the privacy of HHS clientele.”

For this training, there are two forms that must be read and signed at the completion of the training. These forms serve as proof of attendance and will have to be submitted for EDC DMC-ODS Provider Network staff to receive certificates.

During annual monitoring, an Agency Master Roster for the entire fiscal year being monitored will be used to ensure that all EDC DMC-ODS Provider Network staff are compliant. Failure to have all EDC DMC-ODS Provider Network staff compliant will result in a Compliance Deficiency and Corrective Action Plan.

These forms can be obtained via the [Substance Use Disorder Services Training Information tab of the El Dorado County Substance Use Disorder Services webpage-](https://www.edcgov.us/Government/MentalHealth/Pages/SUD-Training.aspx.us)  
<https://www.edcgov.us/Government/MentalHealth/Pages/SUD-Training.aspx.us>



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Required Forms

### Confidentiality Statement

The County of El Dorado and/or HHS A shall provide training to all workforce members in programs meeting the definition of "covered entity" or "health care component" as noted herein and shall require every workforce member to sign a County of El Dorado "Confidentiality Statement Form" outlining their role and responsibilities to protecting the privacy of HHS A clientele.

This form will be proof of the following:

- I have read and I understand the following directives related to confidentiality: **Health and Human Services Agency Privacy and Confidentiality of Client Information Policy A-HH-012**
- I have attended/watched the Information Privacy and Security and Confidentiality Training

# CONFIDENTIALITY STATEMENT

**EL DORADO COUNTY HEALTH AND HUMAN SERVICES**  
**CONFIDENTIALITY STATEMENT**  
FY 24/25

Federal and State Laws and Regulations governing the administration of Health and Human Services programs contain specific confidentiality requirements. It is imperative that Department employees hold in confidence client information and related data under the terms of those requirements.

I understand that, in connection with my employment with the El Dorado County Health and Human Services Agency (HHSA), I may have access to confidential information. I understand that the confidentiality of this information is protected by law and that any breach of confidentiality is a misdemeanor punishable by up to six months in jail, or by a fine of \$500, or both.

I understand that if one of my relatives, or I myself, has had a case or record with HHSA which I feel should be kept confidential, I will notify my supervisor so that access to that case information will be restricted to only certain persons working within the department.

I have read and I understand the following directives related to confidentiality:

**Health and Human Services Agency Privacy and Confidentiality of Client Information Policy A-HH-012**

I hereby agree to abide by the above directives and to consult with my supervisor on any questions I may have regarding confidentiality. In signing this document, I confirm knowledge of the confidentiality requirements and agree to keep confidential all client information and related data as required by law. I have received a copy of this statement.

Employee signature \_\_\_\_\_ Date \_\_\_\_\_

Employee Name (Print Clearly please) \_\_\_\_\_ Agency \_\_\_\_\_

Please return signed form to: [sudsqualityassurance@edogov.us](mailto:sudsqualityassurance@edogov.us)

This Confidentiality Statement form.

As stated earlier in this training, all EDC DMC-ODS Provider Network staff must attend this training at the time of Hire and then Annually.

A copy of the form will be emailed out to all participants after the training. Please note-This form has been updated for FY 24/25. Please do not use forms from previous fiscal years.

For those of you watching this training on-demand, this form can be obtained via the Substance Use Disorder Services Training Information tab of the El Dorado County Substance Use Disorder Services webpage-  
<https://www.edcgov.us/Government/MentalHealth/Pages/SUD-Training.aspx.us>

Please return signed form to: [sudsqualityassurance@edcgov.us](mailto:sudsqualityassurance@edcgov.us)



EL DORADO COUNTY  
HEALTH AND HUMAN SERVICES AGENCY  
POLICY # A-HH-012

## Required Forms

### Privacy and Security Training Certification & Compliance Agreement

The County of El Dorado and/or HHSa shall provide training to all workforce members in programs meeting the definition of "covered entity" or "health care component" as noted herein and shall require every workforce member to sign a County of El Dorado "Privacy and Security Training Certification & Compliance Agreement Form" outlining their role and responsibilities to protecting the privacy of HHSa clientele.

This form will be proof of the following:

- I have read and I understand the following directives related to Privacy and Security: **Health and Human Services Agency Privacy and Confidentiality of Client Information Policy A-HH-012**
- I have attended/watched the Information Privacy and Security and Confidentiality Training

# PRIVACY AND SECURITY TRAINING CERTIFICATION & COMPLIANCE AGREEMENT

**COUNTY OF EL DORADO**  
HEALTH & HUMAN SERVICES  
2000 New Road, Suite 8  
Riverside, CA 92507

Agency Division:  
Administrative & Finance  
Behavioral Health  
Community Services  
Prevention Services  
Public Health  
Self-Sufficiency

**Privacy and Security Training**  
Training Completion Certification and Compliance Agreement FY 24/25

All Behavioral Health - Substance Use Disorder Services (BHSUDS) workforce members staff who assist in the performance of contracted activities or access or disclose Protected Health Information (PHI), Personally Identifiable Information (PII) or Personal Information (PI) must complete Information Privacy and Security Training, upon hire and at least annually.

I, \_\_\_\_\_ have completed the County of El Dorado Health and Human Services Agency (HHSA) BHSUDS Privacy and Security Training as required. While performing my official duties, I may have access to protected health information and personally identifiable information. I understand that:

- PHI, PII and PI is individually identifiable personal and health information that is created, received, transmitted, maintained, or used within the County and Contract Provider Network.
- PHI, PII and PI is not available to the public.
- Special precautions are necessary to protect this type of information from unlawful or unauthorized access, use, modification, disclosure, or destruction.

I agree to:

- Access, use, or modify PHI, PII and PI only for the purposes of performing my official duties.
- Never access or use PHI, PII and PI out of curiosity or for personal interest or advantage.
- Never show, discuss, or disclose PHI, PII and PI to or with anyone who does not have the legal authority to receive the information.
- Never retaliate, coerce, threaten, intimidate, or discriminate against or take other retaliatory actions against individuals or others who file complaints or participate in investigations or compliance reviews with regard to PHI, PII and PI.
- Never remove PHI, PII and PI from the work area without authorization.
- Treat passwords as confidential information.
- Exercise due care to preserve the integrity and confidentiality of electronic protected health information.

Vision Statement:  
Transforming Lives and Improving Futures

- Dispose of PHI, PII and PI by utilizing an approved method of destruction, which includes shredding. I will not dispose of such information in open waste baskets or recycle bins.
- Notify my supervisor, the Privacy/Compliance Officer, and/or the Information Security Officer, as applicable, of a possible violation.

I agree to comply with the terms and requirements provided in the training, including protecting and safeguarding the privacy and security of PHI, PII and PI. I understand penalties for violating any of the above limitations may include disciplinary action, and civil or criminal prosecution.

Date Training Completed: \_\_\_\_\_

Signature \_\_\_\_\_ Provider Facility Name \_\_\_\_\_  
Print Name \_\_\_\_\_  
Date Signed \_\_\_\_\_

Please return signed form to: [sudsqualityassurance@edcgov.us](mailto:sudsqualityassurance@edcgov.us)

This is the Privacy and Security Training Certification & Compliance Agreement form.

As stated earlier in this training, all EDC DMC-ODS Provider Network staff must attend this training at the time of Hire and then Annually.

A copy of the form will be emailed out to all participants after the training. Please note-This form has been updated for FY 24/25. Please do not use forms from previous fiscal years.

For those of you watching this training on-demand, this form can be obtained via the Substance Use Disorder Services Training Information tab of the El Dorado County Substance Use Disorder Services webpage-  
<https://www.edcgov.us/Government/MentalHealth/Pages/SUD-Training.aspx.us>

Please return signed form to: [sudsqualityassurance@edcgov.us](mailto:sudsqualityassurance@edcgov.us)





# QUESTIONS

And with that, we will take any questions you may have.

# EL DORADO COUNTY SUBSTANCE USE DISORDER SERVICES

QUALITY ASSURANCE SUPERVISOR  
SHAUN O'MALLEY  
SHAUN.OMALLEY@EDCGOV.US

QUALITY ASSURANCE TRAINING COORDINATOR  
DENNIS WADE  
DENNIS.WADE@EDCGOV.US



Thank you for attending or watching this presentation.

The forms referenced in this training will be sent out to all who have attended this presentation. Please return them filled out completely and signed to [sudsqualityassurance@edcgov.us](mailto:sudsqualityassurance@edcgov.us).

Please stay tuned for email updates on future training opportunities.

Have a great day and we will see you next time.