Update 2010-17: Common Place Handbook
Breach of Confidentiality

**Background**
In April 2009, the Department of Health Care Services (DHCS) conducted a Privacy and Security audit regarding Personally Identifiable Information (PII). Santa Clara County Social Services Agency was instructed to develop policy surrounding any breach of confidentiality of client information.

**Policy**
A section is incorporated into Section 44 of the Common Place Handbook which outlines steps that must be taken in the event of a real, perceived or potential Medi-Cal PII Security incident.

[Refer to “Breach of Confidentiality Policy,” page 44-14]

**Implementation**
This policy is effective immediately upon receipt of this update.

**Forms**
The following form fill-ins are developed for this process:

**Eligibility**
The following forms are available on-line:

- “Medi-Cal Personal Identifiable Incident (PII) Report” (SCD 2284)
- “Breach of Medi-Cal PII - Frequently Asked Questions” (SCD 2289)

**Note:**
The SCD 2289 is normally used by the Medi-Cal Security Coordinator, but may be sent to the client by the Eligibility Worker if the client has questions about an incident.
The following forms are used by the Security Coordinator only and will not be available to staff on-line:

- “Breach of Confidentiality Letter” (SCD 2283)
- “Medi-Cal Information Incident/Breach Log” (SCD 2288)

Office Management Coordinators must review this new policy with their clerical staff at their next respective clerical meeting, but no later than 08/13/10.

Social Services Program Managers (SSPMs) must review this new policy at their next bureau meeting, but no later than 08/13/10. A monitoring system must be established to ensure Eligibility Work Supervisors have reviewed this section with their respective units by that same date.

Many thanks to Fernando Valcarcel for developing this policy to incorporate into the Common Place Handbook.

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