

HHSA Provider Orientation



County of San Diego - Health and Human Services

Business Assurance and Compliance

SANDIEGOCOUNTY.GOV/HHSA

Provider Orientation



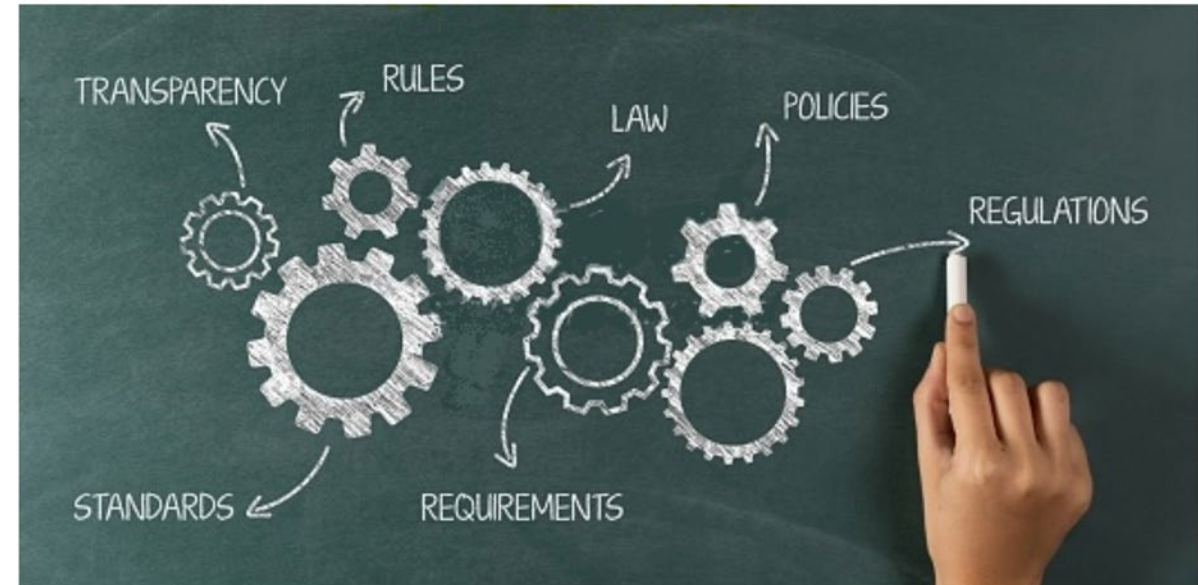
Who we are and what we do...

www.cosdcompliance.org

Business Assurance & Compliance



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Business Assurance & Compliance (BAC) is responsible for coordinating compliance, privacy, and information security policies and programs. BAC ensures standards, provides training and monitors for risk to provide a consistent application throughout the Health and Human Services Agency (HHSA).

Provider Orientation



Common Compliance Sections

- Hotline poster (Article 10.6)
- Background checks (Article 10.11)
- Use of Artificial Intelligence (Article 10.13)
- Conflict of Interest (11.1)
- Exclusion, Debarment, and Medi-Cal checks (Article 12.16)
- False Claims Act (Article 12.17)
- Information Privacy and Security Provisions (Article 14)

Business Assurance & Compliance



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Compliance Resources

BAC supports County of San Diego Health and Human Services Agency (HHSA) Programs in providing assurances for compliance with applicable federal, State and County regulations, assurances for effective and efficient service delivery, and thorough, objective investigation and resolution of potential compliance concerns.

Learn more about [compliance resources](#).

Provider Resources

BAC works closely with HHSA providers to ensure they understand and adhere to all relevant laws, rules, regulations, and requirements.

Learn more about [provider resources](#).

Employee Resources

BAC keeps HHSA staff apprised of the latest changes to compliance, privacy, and information security rules and best practices. One way BAC does this is by sending reminders to staff about common concerns and questions.

Learn more about [employee resources](#).

Provider Orientation



Hotline Posters (10.6)

- Posters
 - [Ethics Hotline Poster English](#)
 - [Ethics Hotline Poster Spanish](#)

DO THE RIGHT THING

IF YOU SEE

WASTE HARASSMENT
DISCRIMINATION
CONFLICT OF INTEREST THEFT
BRIBES FRAUD PRIVACY RISK

SPEAK UP

Report 24 hours a day, 7 days a week.

Online Call Toll-Free: 866-549-0004

You may remain anonymous. Concerns about customer service, operations, and employee performance, labor relations and employee relations should be reported to department management and Human Resources staff. sdcounty.ca.gov

COUNTY OF SAN DIEGO
ETHICS, COMPLIANCE & LABOR STANDARDS

HAGA LO CORRECTO

SI VE

DESPERDICIO
DISCRIMINACIÓN ACOSO
CONFLICTO DE INTERESES ROBO
SOBORNOS FRAUDE RIESGO A LA PRIVACIDAD

¡REPÓRTELO!

Reporte las 24 horas del día, los 7 días de la semana.

En Línea Llame gratis: 866-549-0004

Puede permanecer anónimo. Las preocupaciones sobre el servicio al cliente, las operaciones y el desempeño de los empleados, las relaciones laborales y las relaciones con los empleados deben reportarse a la gerencia del departamento y al personal de Recursos Humanos. sdcounty.ca.gov

COUNTY OF SAN DIEGO
ETHICS, COMPLIANCE & LABOR STANDARDS

Provider Orientation

Background Checks (10.11)

- What does the background check entail?
- What is subsequent arrest notification?
- On whom must I run a check and receive notification?
- How do I run a criminal background check?
- How do I receive subsequent arrest notifications?
 - Applying for a DOJ Livescan account
- What kind of documentation is good to keep?

[Background Check Requirements for HHSA Providers](#)

[Background Checks & Subsequent Arrest Notification FAQs](#)

Provider Orientation

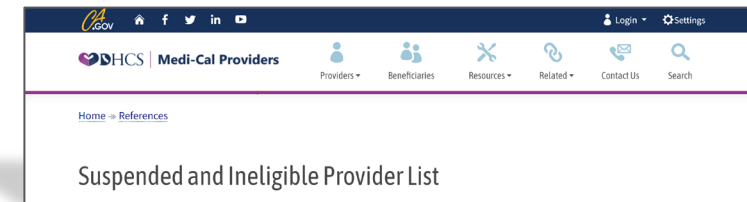
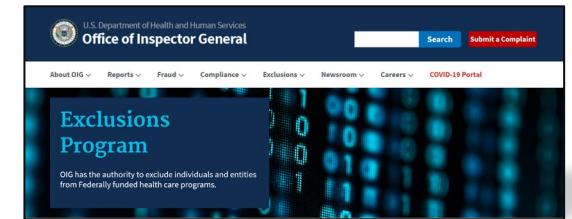
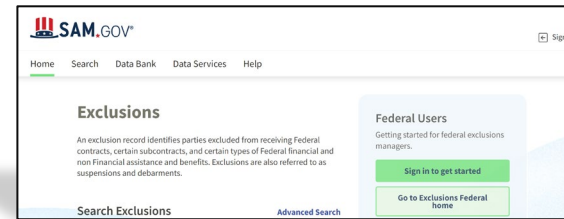
Use of Artificial Intelligence (AI) (Section 10.13)

- Compliance with Board Policy A-140
- Disclosures of any AI functionality embedded in products or services rendered under your Contract
- All AI tools used must comply with County standards for security, privacy, and ethical practices
- Human oversight of AI-generated output for contract-related services
- Clear attribution of AI-generated content
- AI systems shall not be used for:
 - Fully automated decisions without meaningful human oversight
 - Covert tracking
 - Social scoring
 - Behavioral manipulation

Provider Orientation

Exclusion, Debarment, and Medi-Cal Checks (12.16)

- What is an EDM check?
- How to run an EDM check
- Who gets checked?
- What kind of documentation is good to keep?



[Exclusion, Debarment, & Medi-Cal Sanction Checks Requirements for HSA Providers](#)

[Exclusion, Debarment, & Medi-Cal Sanction Checks Helpful Hints for HSA Providers](#)

[Exclusion, Debarment & Medi-Cal Sanction Checks FAQ](#)

Provider Orientation

Information Privacy and Security Provisions (Article 14)

- Know your State Agreement requirements (not just HIPAA)
- Annual Article 14 monitoring tool

[HHSA: Priv and Sec. FAQs](#)

[HHSA: Article 14 and state agreements](#)

INFORMATION PRIVACY AND SECURITY PROVISIONS

- 14.1 Recitals. This Article is intended to protect the privacy and security of County information that Contractor may create, receive, access, store, transmit, and/or destroy under this Agreement. In addition to the below Responsibilities, contractor shall be in compliance with the following rules, regulations, and agreements, *as applicable*:
- 14.1.1 Health Insurance Portability and Accountability Act, specifically, Public Law 104-191, the Health Information Technology for Economic and Clinical Health Act, Public Law 111-005, 42USC section 17921 et seq., and 45CFR Parts 160 and 164, collectively referred to as “HIPAA;”
 - 14.1.2 County agreements with the State of California, collectively referred to as “State Agreements” and posted on the County’s [website](#), including:
 - 14.1.2.1 For Eligibility Operations contracts, the Medi-Cal Eligibility Data System Privacy and Security Agreement Between the California Department of Social Services and the County;
 - 14.1.2.2 For Mental Health contracts, the Medi-Cal Behavioral Health Services Performance Agreement between the California Department of Health Care Services (DHCS) and the County;
 - 14.1.2.3 For Substance Use Disorder contracts, the San Diego County Alcohol and Drug Program Administrator Agreement between DHCS and the County;
 - 14.1.2.4 For Aging and Independence Services contracts, the Standard Agreement between the County and the California Department of Aging;
 - 14.1.2.5 For Whole Person Wellness contracts, the Agreement for Whole Person Care Pilot Program for San Diego County with DHCS; and
 - 14.1.2.6 For Public Health Services contracts, the Standard Agreement between the County and the California Department of Public Health.

Provider Orientation



Privacy Incident Reporting

- Most reporting within 24 hours but some **immediately (500 or more individuals)**
- May be accompanied by a Serious Incident Report to COR

[Submit a Privacy Incident Report](#)

A screenshot of the "Privacy and Security Incident Reporting" web portal. The page header includes the "Health & Human Services Agency" logo and a search bar. The main content area is titled "Privacy and Security Incident Reporting" and features two primary action buttons: "Report a New Incident" (orange) and "Update or View an Incident" (green). The "Report a New Incident" section includes a description of the reporting process and a "Report" button. The "Update or View an Incident" section includes a description and a form with fields for "PIR#" and "Access ID #", with a "Submit" button. A footer note provides contact information for assistance.

Health & Human Services Agency

ENHANCED BY Google

MENU PROGRAMS ALL SERVICES A-Z FACILITIES ADVISORY BOARDS CONTACT US

Privacy and Security Incident Reporting

Report a New Incident

Report a new privacy incident or information breach by submitting a Privacy Incident Report (PIR) to the Agency Compliance Office.

** Do not include any client-identifying information.*

Report

Update or View an Incident

Update or view the status of an existing Privacy Incident Report (PIR).

PIR# Access ID #

e.g PIR-12345

Submit

Need assistance? Refer to the [Desk Aid](#) for report instructions. For questions not related to a privacy incident, please contact us by email at compliance.hhsa@sdcounty.ca.gov or by phone at (619) 338-2807.

Provider Orientation

False Claims Act Training (12.17)

- [False Claims Act Requirements for HSA Providers](#)
- [False Claims Act Training for HSA Providers](#)

FALSE CLAIMS

Provider Orientation



How can we help?

- Walk Throughs
- Trainings for staff
- Trainings for Privacy/Security Officers
- Policies, Procedures, and Forms
 - [Compliance](#)
 - [Information Security](#)
 - [Privacy](#)
- Encrypted Email Tunnel
- Q&A



Provider Orientation



More questions? Ask us!



Website:

www.cosdcompliance.org



Phone Number:

(619) 237-8571



Mailbox:

PrivacyOfficer.HHSA@sdcounty.ca.gov

Compliance.HHSA@sdcounty.ca.gov