

County Of San Diego
Health and Human Services Agency (HHSa)

SUBJECT: Accounting of Disclosures of Protected Health Information

NO: HHSa-L-03

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DATE: April 15, 2026

REFERENCE: Health Insurance Portability and Accountability Act; 42 CFR Part 2; California Information Practices Act; various State agreements.

POLICY: In compliance with State and federal laws and regulations, the County will track disclosures of protected health information (PHI) and provide accountings of such disclosures to individuals upon request. Business Assurance and Compliance shall establish procedures to handle accounting of disclosures documentation and requests.

PROCEDURES: See related procedures and forms at www.cosdcompliance.org.

RESPONSIBILITIES: Privacy laws and regulations, such as the Health Insurance Portability and Accountability Act (HIPAA), 42 CFR Part 2, the California Information Practices Act (IPA), and others, outline confidentiality requirements and clients' rights to their protected information. Many HHSa programs also have agreements with the State of California that outline additional confidentiality parameters. Compliance with these regulations is addressed in a series of agency policies and procedures maintained by Business Assurance and Compliance.

DEFINITIONS: See HHSa Policy L-30 Privacy Definitions.

QUESTIONS/INFORMATION: Please contact HHSa Business Assurance and Compliance by email at Compliance.HHSa@SDCounty.ca.gov or by phone at (619) 237-8571.

Approved: Christy Carlson

Christy Carlson
Director
Business Assurance & Compliance