

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

SUBJECT: **Covered Entity Designation**

NO: **HHSa- L-28**

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DATE: September 8, 2026

REFERENCE: Health Insurance Portability and Accountability Act (HIPAA)

POLICY:

The County of San Diego, Health and Human Services Agency (HHSa) classifies itself as a HIPAA 'hybrid entity,' meaning its business activities include both covered and non-covered functions. Likewise, most HHSa departments are also HIPAA hybrid entities, because they include covered and non-covered programs. All covered programs below perform one or more covered functions, and are designated below.

- HHSa Administrative Support Divisions - Hybrid
 - Agency Executive Office (AEO) - Covered
 - Agency Contract Support - Covered
 - Business Assurance & Compliance - Covered
 - Clinical and Safety Net Coordination - Covered
 - Department of Strategy and Community Engagement (DSCE) - Hybrid
 - Office of Business Intelligence - Covered
 - Other DSCE programs - Not Covered
 - Fiscal Services and Support Division - Covered
 - Human Resources - Covered
 - Information Technology Services – Covered
 - Tobacco Settlement Funds – Not Covered
- Aging and Independence Services (AIS) - Hybrid
 - Administration & Executive Teams - Covered
 - Adult Protective Services- Not Covered
 - Community Engagement – Not Covered
 - Health and Social Services – Hybrid
 - Other Programs – Not Covered
 - In-Home Support Services - Not Covered
 - Public Authority and Public Guardian - Not Covered
- Child and Family Well-Being (CFWB) - Hybrid
 - Administration and Executive Teams - Covered
 - Office of Child Safety - Hybrid

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- Child Abuse and Neglect Hotline - Not Covered
 - Core Operations – Not Covered
 - Extended Foster Care – Not Covered
 - Placement and Supporting Services – Not Covered
 - Polinsky Children’s Center – Covered
 - Resource Family Approvals – Not Covered
 - San Pasqual Academy – Not Covered
 - Office of Child and Family Strengthening - Hybrid
 - Child Care System – Not Covered
 - First 5 San Diego – Covered
 - Prevention and Preservation Services – Not Covered
- Housing and Community Development Services (HCDS) - Hybrid
 - Administration and Executive Teams - Covered
 - Alternatives to Incarceration - Covered
 - Community Care Coordination - Covered
 - Domestic Violence Shelter Based Program - Covered
 - Enhanced Care Management and Community Supports - Covered
 - Housing and Disability Advocacy Program - Covered
 - Regional Homeless Assistance Program - Not Covered
 - Rental Subsidy Programs for Homeless Individuals and Families – Not Covered
 - Supportive Services for Homeless Individuals and Families – Not Covered
- Public Health Services (PHS) - Hybrid
 - Administration and Executive Team - Covered
 - Border Health – Not Covered
 - California Children’s Services - Covered
 - Infectious Disease Control - Hybrid
 - Clinical Services - Covered
 - Investigations - Not Covered
 - Pharmacy - Covered

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- Preparedness and Response - Covered
- Prevention Services – Hybrid
 - Maternal Child Health – Covered
 - Other Prevention programs – Not Covered
- Regional Public Health Centers - Covered
- Surveillance - Hybrid
 - Office of Vital Records – Not Covered
 - Public Health Lab – Covered
 - Remaining/Other Surveillance programs – Not Covered
- Self Sufficiency Services (SSS) - Hybrid
 - Administration and Executive Team - Covered
 - CalFresh - Not Covered
 - CalWORKs - Not Covered
 - County Medical Services - Covered
 - General Assistance and General Relief - Not Covered
 - Medi-Cal/MEDS - Not Covered
 - Office of Immigrant and Refugee Affairs - Not Covered
 - Office of Military and Veterans' Affairs - Not Covered
 - Welfare to Work - Not Covered

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
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Business Assurance & Compliance