

**County of Sonoma**  
**HIPAA Hybrid Entity - Chart of HIPAA Covered Components**

COUNTY DEPARTMENT/DIVISION/PROGRAM	Covered Component	Covered Service or Function	Program/ Function
<b>Agriculture</b>	No		Performs a variety of functions designed to promote and protect the agricultural industry and environment in the County. Does not perform covered services or functions.
<b>Auditor-Controller Treasurer-Tax Collector</b>	No		Chief financial officer of the County, provides general supervision over the accounting of all organizations under the control of the Board of Supervisors.
<b>Child Support Services</b>	No		Responsible for the County Child Support Enforcement Program to collect child support from parents in order to reduce public assistance costs.
<b>County Administrator</b>	No		Assists Board of Supervisors in managing, directing and coordinating the operation of all departments over which the Board exercises control. Does not perform covered services or functions.
<b>County Clerk</b>	No		Issues marriage licenses, performs marriage ceremonies, recording and maintaining fictitious business name statements and notary bonds, processes passports and environmental documents. Does not perform covered services or functions.
<b>County Counsel</b>	Yes	Business Associate	County Counsel conducts and/or arranges for legal services for covered component within the County. County Counsel is a covered component only when providing support to the other covered components within the County for the activities related to covered functions.
<b>District Attorney</b>	No		Conducts all prosecutions for public offenses in Sonoma County.
<b>Department of Emergency Management</b>	No		Coordinates and carries out emergency preparedness and response activities related to hazardous materials, natural disasters and fire. Does not perform covered services or functions.
<b>Grand Jury</b>	No		Responsible for the examination of all aspects of county and city government and special districts. Does not perform covered services or functions.
<b>Health Services (DHS)</b>	Yes		Provides services and leadership to encourage health-affirming values, behaviors and environments, fostering optimum health and wellness for County residents.
<i>Administration Division</i>	Yes		Provides administrative services including budget administration, payroll, accounting, contract management and coordination of Medi-Cal Administrative Activities and Targeted Case Management Programs.
Contract Management (CBID)	Yes	Contract Development	Staff review new and renewing contracts for all required elements including Business Associate Agreements.
Fiscal	Yes	Billing; Claims Mgmt.	Accounting staff support the transmission of claims data to EDS and manage corresponding remittance advises from the State. Disclosures required for Cost Report (e.g., SB90) are for payment activities of the CE and therefore, disclosures of PHI are permitted w/o authorization. Note: data sent to CA is aggregate data.
Health Policy, Planning and Evaluation	Yes		Provides leadership, coordination, resources and technical and collaborative support to health promotion and prevention efforts within DHS and the community. Does not perform covered services or functions.
Assessment and Epidemiology	Yes	Research and Data Services	This team provides research, data analysis, reporting, GIS mapping and analysis and related presentation items to all DHS programs, and assists other County departments and our community partners with data services. Main focus is epidemiology (study design, hypotheses, data collection, analyses, reporting). Department wide shared service.

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Information Technology (IT)	Yes	Business Associate	
Medi-Cal Administrative Activities Program	No		Manages and monitors Sonoma County's participation in the Medi-Cal Administrative Activities (MAA) which is a Federal Financial Participation (reimbursement) Program.
Targeted Case Management (TCM)	Yes	Business Associate	Manages and monitors Sonoma County's participation in the Targeted Case Management (TCM) program which is a Federal Financial Participation (reimbursement) Program.
<b>Behavioral Health Division</b>			Responsible for providing a range of community mental health and substance use services. Eligible services are claimed to Medi-Cal, CMSP, and other third party payors.
AB109 1370 Program (JMHC)	No		AOD Services provided to eligible incarcerated individuals; Provides court recommendations and restoration services to individuals deemed incompetent to stand trial.
AB109 Out of Custody (co-location)	No		AOD services for out of custody on probation – Medi-Cal eligible- AOD services including referral, short term group and individual therapy , refer for medication assessments, and response to beneficiary complaints and provider appeals; provides screening and referral services to probationers with mental health and/or substance use disorders –these funds come from probation earmarked for AB 109.
Access Team	Yes	Healthcare Services	Provides mental health services for Sonoma County Medi-Cal beneficiaries, including referral, consultation, short-term group therapy, medication services and response to beneficiary complaints and provider appeals.
Adolescent Treatment Program (ATP) SAPT Federal	No		AODS services provided by County Staff include services to Sierra Youth Center, Probation Camp and to detainees (inmates) at Juvenile Hall. These services are exempt from HIPAA regulation. ATP out of custody clients receive services, assessments , recommendations, referrals from SAPT dollars earmarked for Adolescent treatment .
Adult Special Programs (Housing & DOR Coop)	Yes	Healthcare Services	Provides employment and some housing services. Housing services are Medi-Cal eligible and billed to Medi-Cal (therefore service covered under HIPAA); employment services are not Medi-Cal eligible (therefore are not a covered service).
BH Program Support	Yes	Business Associate	Administrative support for MH and SUDS programs and services.
Community Mental Health Clinics (CMHC)	Yes	Healthcare Services	Clinics located throughout the service area to provide access to mental health services.
Crisis Assessment Prevention & Education (CAPE) & CAPE Triage	No		Outreach program.
Crisis Stabilization Services	Yes	Healthcare Services	24 hour response to acute emotional and/or psychiatric crisis.
Dependency Drug Court (DDC)	No		Staff are liaison between family court and treatment providers. No direct services provided.
Driving Under the Influence (DUI)	No		AOD Services provided in addition to DMV required education. AODS services are not billed to health plans. Providers in this program do not meet the definition of a covered entity.
Driving Under the Influence (DUI) Court	No		Staff are liaison between court and treatment providers. No direct services provided.
Drug Court	No		Staff are liaison between court and treatment providers. No direct services provided.
Drug Medi-Cal Services	Yes	Billing, Claims Management	Drug Medi-Cal Services are provided by contracted providers. County provides billing and claims management.
Drug Testing	No		Court referred case managed clients receive testing.
Drug-Free Babies (DFB)	No		Staff are liaison between treatment providers and other referrals such as CPS, hospitals etc....
Family Advocacy Support & Treatment (FASST)	Yes	Healthcare Services	Multidisciplinary teams provide intensive community based services, individual and group therapy, rehabilitation, medication, case management and support services.
Forensic Assertive Community Treatment (FACT)	Yes	Healthcare Services	Multidisciplinary teams provide intensive community based services, individual and group therapy, rehabilitation, medication, case management and support services.
Hospital Utilization/Liaison	Yes	Business Associate	Provides coordination and oversight for Sonoma County Medi-Cal beneficiaries who require acute psychiatric hospitalization.
Transportation Team	No		Provides transportation to clients to appointments, to court, and from acute psychiatric hospitals and IMDs.

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Adult Services Team (Formerly IHT)	Yes	Healthcare Services	Multidisciplinary teams provide intensive community based services, individual and group therapy, rehabilitation, medication, case management and support services.
Integrated Recovery Team (IRT)	Yes	Healthcare Services	Multidisciplinary teams provide intensive community based services, individual and group therapy, rehabilitation, medication, case management and support services.
Juvenile Hall Alcohol and Drug Services (Under 18 yrs.old)	No		Clients are detainees (inmates). HIPAA regulations do not apply to this program.
Juvenile Hall/Valley of the Moon Mental Health Services	No		Provides intensive mental health services to Youth confined (incarcerated) at Los Guilocos Juvenile Hall. Services cannot be billed to health plans.
Mobile Support Team (MST) & MST Triage	No		Liaison with law enforcement
Older Adult/ Transitional Recovery Services	Yes	Healthcare Services	Mobile outreach, assessments, crisis intervention, medication and case management services provided to adults 60 years and older.
Patient's Rights	Yes	Business Associate	Patient's Rights Advocacy Services
Quality Assurance - SUD	Yes	Business Associate	Quality Management Team review and overview all programs for compliance through monitoring, audits, and grievances as required by DHCS.
Quality Assurance & Medi-Cal Records - MH	Yes	Business Associate	Team performs and monitors quality assurance activities and ensures compliance with the SCBH Medi-Cal contract with the Department of Health Care Services.
Quality Improvement	Yes	Business Associate	Team performs and monitors QI activities and ensures compliance with External Quality Review Organization.
SonomaWorks Welfare Reform Alcohol and Drug Services	No		AODS counselors provide assessment, referral, and case management as part of the Welfare to Work Team. No billable health care services provided.
SUD Program Support	Yes		Provides referrals and resources to incoming calls
Transitional Age Youth (TAY)	Yes	Healthcare Services	Multidisciplinary team provides intensive community based services, individual and group therapy, rehabilitation, medication, case management and support services.
Treatment Accountability for Safer Communities (TASC)	No		Screening inmates to identify and assess alcohol/drug problem for placement; case management and liaison between AODS providers/court/probation officer.
Youth & Family - Foster Youth Team	Yes	Healthcare Services	Provides assessment, psychiatric evaluation, medication services, individual, group and family counseling, case management for youth from 4 to 21 years of age.
Youth & Family - Outpatient Treatment Team	Yes	Healthcare Services	Provides assessment, psychiatric evaluation, medication services, individual, group and family counseling, case management for youth from 4 to 21 years of age.
<b>Public Health Division</b>	Yes		Responsible for assessment, assurance and program development to protect the health of the public.
Animal Services	No		Serves the public in the care and well being of animals, both domestic and livestock, throughout the unincorporated areas of Sonoma County and the City of Santa Rosa.
California Children's Services (CCS)	Yes	Healthcare Services	The CCS Regional Branch meets the definition of a health plan. The Program provides health care benefits for children with physical handicapping conditions. CCS Regional Branch distributed Notice of Privacy Practices to all clients and provided Notice for use by county agencies. County agencies have a 'business associate' relationship between CCS Regional, clients and local contracted providers.
CCS Medical Therapy Unit	Yes	Healthcare Services	Provides physical and occupational therapy services to children in the CCS program.
Child, Health, Disability and Prevention (CHDP)	Yes	Healthcare Services	Administration of CHDP program including care coordination and referral to CCS services. Administration is funded by Federal, State and County funds. Technical support for providers; program eligibility determinations for Medi-Cal Outreach; Foster Care case coordination and CHDP Nutrition Program. Notice of Privacy Practices issued by State - see CHDP Program Letter No: 03-05.
Dental Health Program	No		School based program to screen students for dental health issues.

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Disease Surveillance & Control	Yes	Healthcare Services	Provides services that reduce the incidence of communicable diseases in the community through surveillance and investigation of individual cases and outbreaks.
Emergency Medical Services Agency (EMS)	No		Letter dated April 16, 2003 from Emergency Medical Services Authority confirming that EMS is not a covered entity.
Emergency Preparedness	No		Ensures Department of Health Services is prepared to respond to emergencies. Also coordinates and supports emergency preparedness efforts across coalition of healthcare providers. Services are not billed to health plans.
Environmental Health	No		Promotes health and quality of life by preventing or controlling those diseases or deaths that result from interactions between people and the places they live, work and play.
Home Visiting Nursing Programs	Yes	TCM	Provides home visits for health, child development, parent education referral and linkages. Medi-Cal (TCM) only.
Healthy Eating, Active Living (HEAL)	No		Promotes healthy eating and active lifestyles for all Sonoma County residents
Immunization Assistance	No		Provides community oversight and education about Immunizations. No direct services provided.
Juvenile Hall and Probation Camp	No		Coordinated health care program for residents of Juvenile Hall and Probation Camp.
Juvenile Health Services	No		Program management of medical, mental health and substance abuse intervention services are provided to minors detained at Juvenile Hall.
Nurse-Family Partnership	Yes	TCM	Provides outreach visits for health, child development, parent education referral and linkages. Medi-Cal (TCM) only.
Comprehensive Perinatal Services Program	No		Outreach, family and home assessment, education, referral to support services and linkages to other community services.
Public Health Laboratory	No		Provides services to hospitals and other providers. Does not bill services to health plans for reimbursement
Teen Parent Connections	No		Provides referrals to community services including referrals to health care providers. Case management of teen parents to monitor school attendance, provide transportation, child care aid, and education. No direct health care services provided.
Tobacco Prevention	No		Provides prevention services and coordinates tobacco/nicotine control activities with our community partners and allies to create a healthier community.
Valley of the Moon Medical Program	No		Program management of medical health services provided to minors housed at Valley of the Moon Children's Home.
Vital Statistics	No		Exempt from HIPAA regulation.
WIC, Special Supplemental Nutrition Program for Women, Infants and Children	No		HIPAA explicitly exempts these programs from the regulations.
<b>Homelessness Services Division</b>	No		Provides services in an effort to end homelessness and case management of high-risk populations
<b>Human Services (HSD)</b>	Yes - MSSP, HCBA, and STRTP		Responsible for the administration of service systems including Welfare Administration and Program Financial Assistance; Adult and Aging Services, Employment Services, Social Services for Families; and Veterans Benefits Services.
Administrative Services	No		Provides administrative services to support HSD Operations.
Adult Protective Services	No		Investigates complaints of adult abuse, neglect or exploitation. Provides community education about elder abuse prevention. Provides 24 hour response to life threatening emergencies involving elder and dependent adults.
Aging and Disability Resource Unit (ADRU)	No		Helps ensure the safety and well-being of vulnerable adults, provides protective/supportive social services and community training/ coordination.
Area Agency on Aging	No		Coordinates planning and funding for programs allowing persons 60 yrs. and old to secure maximum independence in the community.
Contract Management	No		Provides centralized contract management for the department.
Economic Assistance Division	No		Provides assistance to obtain food, shelter, medical and dental care for low income families with children, those disabled or unemployed and children in foster homes or low income residents who are not eligible for SonomaWORKS (see Fed. Reg. 12/2000 pg. 82479)
Employment and Training Division	No		Administers an array of education, employment and vocational training programs.
Family, Youth and Children's Services	No		Services include Emergency response to child abuse and neglect; family maintenance protective services; family reunification, pregnancy planning and support services. Programs do not include the provision of health care services.

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General Assistance and Food Stamps	No		Provides assistance with shelter, food and employment services for disabled/unemployed and not eligible for SonomaWORKS.
Home and Community-Based Alternatives Waiver Program (HCBA)	Yes	Healthcare Services	The Home and Community-Based Alternatives Waiver (HCBA) program helps put supportive services in place that allow participants to stay at home.
In-Home Support Services	No		Provides in-home care to low income and disabled individuals in order to remain safely and independently in their homes. State has issued letter confirming this determination.
Job Link	No		Coordinates available resources for job seekers and employers. Works with community organizations, state agencies, educational institutions and local businesses to match qualified people with quality jobs.
Linkages	No		Services billed to Medi-Cal are for targeted case management (TCM). Per Alan O'Connor at CDA (916-324-2944) - Linkages program does not meet definition of a covered entity.
Multipurpose Senior Services Program (MSSP)	Yes	Healthcare Services	Provides case management and purchases services for frail, elderly clients who are eligible for Medi-Cal. Meets definition health plan (per DHS) - CDA is the Business Associate - all enrollees received NOPP by mail.
Public Guardian, Public Administrator, Public Conservator	No		The Public Guardian-Conservator-Administrator provides mandated conservatorship and estate administration services as specified by the Probate Code and Welfare and Institution's Code.
Redwood Children's Center	No		Observation and assessment of victims of child sexual abuse.
Short-Term Residential Therapeutic Program (STRTP)	Yes	Healthcare Services	The Home and Community-Based Alternatives Waiver (HCBA) program helps put supportive services in place that allow participants to stay at home.
SonomaWORKS	No		Provides job-search assistance, career planning, aptitude assessment, training and referral to help clients attain and retain employment.
Valley of the Moon Children's Home	No		Provides emergency placement for children removed from their homes pending a determination of the need for further custody for the child's safety or return home.
Veterans Service Office	No		Assists and advocates for veterans and their dependents and survivors to claim state and federal benefits. Provides information and assistance in obtaining medical and other services.
<b>Human Resources</b>	Yes		Provides personnel and employee relations services to county departments and agencies governed by the Board of Supervisors. Manages employee Health Benefit Plans.
Eligibility for Third Party Health Plans (Medi-Cal, Dental, Vision)	No		Responsible for reporting eligibility (subscriber and dependent enrollment information to establish or terminate insurance)for health plans electronically with a covered entity (e.g. Kaiser). Submits premium payments and reconciles billing for eligibility.
Employee Assistance Program for County Employees	No		EAP program provides health care services, however the services are not billed to a health plan.
Flexible Spending Account	Yes	Health Plan	DHHS has determined that plans that pay for medical benefits and services (copayments, deductibles, etc.) are Health Plans.
Health Reimbursement Account Program	Yes	Health Plan	DHHS has determined that plans that pay for medical benefits and services (copayments, deductibles, etc.) are Health Plans.
Liability & Insurance Unit	Yes	Business Associate	Receives PHI from DHS Behavioral Health related to Sentinel Event Reporting.
Self-Funded County Health Plan	Yes	Health Plan	Responsible for the management of (1) group health plan third-party service contracts; and (2) Self-funded County Health Plan.
<b>Information Systems (ISD)</b>	Yes	Business Associate	Provides leadership, support and coordination of technological effort in most County departments including, computer network technology, communications, systems integration and record management (paper and electronic).
<b>Office of Equity</b>	No		Works to address social and racial equity issues and to ensure county policies and programs result in greater positive outcomes for communities of color.
<b>Permits/Resource Management (PRMD)</b>	No		Responsible for management of County land-use and development activities.
<b>Probation</b>	No		Responsible for management of adult and juvenile detention facilities.

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<b>Public Defender</b>	No		Defends any person who is not financially able to employ counsel.
<b>Regional Parks</b>	No		Operates and administers the County's Regional Parks system.
<b>Registrar of Voters</b>	No		
<b>Sheriff</b>	No		Responsible for the operation of adult detention facilities, delivery of law enforcement and related emergency services to unincorporated areas of County.
<b>Public Infrastructure</b>	No		Provides road construction and maintenance services for the provision of various public utility services. Does not perform covered services or functions.