

- MEMORANDUM -

DATE: March 1, 2024
TO: Alameda County Behavioral Health Contracted Providers
FROM: Vanessa Baker, ACBH Deputy Director/ Plan Administrator *Vanessa Baker*
SUBJECT: **Contract Provisions - Clarification on Reporting of Staff Roster Changes**

Alameda County Behavioral Health (ACBH) is issuing this memo to remind Providers of the following Contract language found in Exhibit A-1, Section IV. C. Notice of Changes in Key Personnel, which outlines the reporting structure and timeline for reporting staff changes to ACBH Information Systems (IS), is as follows:

Contractor shall notify ACBH Information Systems (IS) within five business days if any of its staff with access to protected health information (PHI) or personally identifiable information (PII) through ACBH's applications (e.g., ACBH Billing System, Clinician's Gateway, Yellowfin) no longer need this access due to separation from the organization, change in functions or death so that ACBH can terminate/revoke access. Contractors shall notify ACBH of changes in employees, volunteers, Board Members, and agents of Contractor, non-clinical and clinical, providing and/or supporting Federally-funded services and/or goods under this Agreement. This notification shall be made through the ACBH Staff Number Request E-Form.

Please be advised that the report submission to expire/update staff numbers for unauthorized personnel (i.e. former staff), individuals who no longer need access to protected health information (PHI) or personally identifiable information (PII) through ACBH's applications, **must be submitted within five (5) business days of the end of the individuals access need**. These notices should be submitted via E-Form report, hyperlinked below.

Report E-form link can be accessed here:

- MHS Staff Number: https://eforms3.bhcs.internal/lincdoc/doc/run/alameda/MHS_StaffNumber
- SUD Staff Number: https://eforms3.bhcs.internal/lincdoc/doc/run/alameda/AOD_StaffNumber

Upon receipt of the timely E-form report, in compliance with the Health Insurance Portability and Accountability Act (HIPAA) Security Rule, ACBH Information Systems (IS) unit will terminate/revoke access. Failure to comply with HIPAA requirements can result in civil and criminal penalties, and corrective actions through HCSA Office of Compliance Services.

If you have any questions, please contact your assigned Program Contract Manager (PCM) at the ACBH Contracts Unit.

Thank you for your attention to this matter. Your ongoing partnership and commitment in ensuring the privacy and security of consumer data is greatly appreciated.

