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Subject:	Care Plus Program Information Privacy and Security Policy
Authority:	County Executive Office: Signature Signed by: Michelle Aguirre 1B08898A0E6A4FA...
Policy Owner:	CEO-Office of Care Coordination: Signature Signed by: Doug Becht 8A5EF37F35764E0...
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A. Policy

The County of Orange (County) identified the need to improve care coordination and delivery of services for those experiencing homelessness or requiring integrated services across the System of Care. The System of Care includes Behavioral Health, Community Corrections, Healthcare, Housing, and Benefits and Support Services. To address this priority, the County of Orange created the Care Plus Program (CPP) to allow System of Care partners to share information through the data platform Compass OC for those in need of coordinated services. The Care Plus Program allows providers to have a holistic view of an individual's needs to maximize services and achieve the most appropriate level of care for their needs.

This Information Privacy and Security Policy ("Policy") applies to the Care Plus Program and its participants. All Participating Entities and Members must comply with the Policy.

B. Purpose

The purpose of the Policy is to provide mandatory guidance for the creation, storage, use, disclosure, transfer, and exchange of information when participating in or acting on behalf of the Care Plus Program.

C. Authority

A variety of state and federal laws protect the confidentiality of certain personal information. For instance, an individual's medical and behavioral health information is protected by the Health Insurance Portability and Accountability Act of 1993 (HIPPA) and its implementing regulations (42 CFR Part 2, 45 C.F.R Parts 160, 162 and 164), the Confidentiality of Medical Information Act (California Civil Code section 56, et. seq.), and the California Lanterman-Petris-Short (LPS) Act (California Welfare and Institutions Code section 5000 et seq.). Other examples of legal protections for confidential personal information include Welfare and Institutions Code section 10850 (welfare services) and Penal Code section 13300 (local summary criminal information).

To ensure Participating Entities can provide integrated services through the Care Plus Program while maintaining the confidentiality of a client's protected information, the Care Plus Program permits the sharing of client confidential information among Participating Entities or Members only where allowed by law or a client's written authorization. The Care Plus Program model is developed

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through existing mechanisms for sharing confidential information, such as Assembly Bill (AB) 210 (Welfare and Institutions Code section 18999.8) and individual authorizations for disclosure and receipt of confidential information. This Policy ensures those who are entrusted with client confidential information protect it and share it only as authorized by the client or by law.

D. Scope

This Policy applies to Participating Entities and Members. The Participating Entities are listed in the Care Plus Program Authorization to Use and Disclose Protected Health and Personal Information Form (Authorization Form). Each Participating Entity must sign a Participating Entity agreement, and each Member must sign a confidentiality agreement and complete the mandatory annual CPP training that binds them to the terms of this Policy.

E. Responsibilities

Participating Entities must collaborate and share information to coordinate and optimize services to Clients. A core component Care Plus Program is the secure exchange of client information via Compass OC, enabling a comprehensive view of the client's circumstances to facilitate their needs. Participating Entities are expected to work seamlessly in partnership to provide needed services and support for the Client. Their ability to share client information, as needed, will substantially enhance client services and the Participating Entities' ability to provide them. No confidential information with respect to individuals under the age of 18 shall be included in Compass OC.

F. Definitions

Term	Definition
Authorization Form	The Care Plus Program Authorization to Use and Disclose Protected Health and Personal Information Form (Authorization Form) allows Care Plus Program Participating Entities to disclose to each other confidential information, including personally identifying information and protected health information, for the purposes of coordinating a client's care. More information can be viewed on the Authorization Form and in the Care Plus Program Privacy Notice.
Breach	The unauthorized acquisition, access, use or disclosure of Personally Identifiable Information (PII) or Protected Health Information (PHI) which compromises the security, privacy, or integrity of such information.
Care Plan	A plan developed by the Care Team to identify goals, coordinate services, and provide support for an individual client.

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Term	Definition
Care Plus Program	Provides care coordination for those who are most vulnerable across the County's five systems of care: behavioral health, community corrections, healthcare, housing, and benefits and support services. Through collaborative efforts, Participating Entities and their Members utilize program tools, including Compass OC, to identify and assess client needs and linkages to services. This approach aims to maximize resources and expedite care coordination.
Care Team	A group of Members of Participating Entities who work collaboratively to address a client's comprehensive needs, including developing and following a client's Care Plan, providing multi-disciplinary services, and coordinating case management.
Client	A willing individual who is identified by Members of Participating Entities to receive Care Plus Program services.
Cohort	An Office of Care Coordination defined group of clients who are identified to receive specifically designed Care Plus Program services.
Compass OC	A data integration platform utilizing databases from Participating Entities to enhance case management and provide a comprehensive understanding of the client's circumstances to enhance client care coordination.
Member	Any individual of a Participating Entity who provides care coordination for clients through the Care Plus Program.
Participating Entity	A public or private entity that coordinates its services to clients through the Care Plus Program.
Personally Identifiable Information (PII)	Information that identifies or describes an individual, or with respect to which there is a reasonable basis to believe the information can be used to identify the individual, including, but not limited to, name, Social Security number, date of birth, physical description, home address, telephone number, education, financial matters, medical, employment history, social benefit history, criminal history, probation history, or housing history.
Privacy Governance Committee	A group of County of Orange departments identified by the Care Plus Program Steering Committee to oversee and provide guidance on matters related to Compass OC, specifically: information technology governance, risks, compliance framework, and maintenance of privacy and security protocols.

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Term	Definition
Privacy Notice	The Care Plus Program Privacy Notice explains how a client's information can be legally used and disclosed and the client's rights regarding the privacy of their information.
Protected Health Information (PHI)	Information that relates to the past, present, or future of health, or payment for the health care that is individually identifiable health information, such as a person's name, physical description, medical record number, or Social Security number that is transmitted or maintained in any form or medium, including electronic, written, or verbal.
Security Incident	The unauthorized acquisition, access, use or disclosure of Personally Identifiable Information (PII) or Protected Health Information (PHI).
Steering Committee	The Care Plus Program Steering Committee is a group of County of Orange departments identified by the County Executive Office to provide operational guidance and implement Care Plus Program policy consistent with Board of Supervisors' direction.

G. Establishment of Cohorts and Care Teams

G.1 Cohorts

Subject to the supervision and direction of the Steering Committee, the Office of Care Coordination is responsible for creating and managing Cohorts. Subject to Steering Committee approval, the Office of Care Coordination may create, modify, or eliminate Cohorts as Care Plus Program needs require.

G.2 Care Teams

The Office of Care Coordination is responsible for creating and managing Care Teams within each Cohort. Participating Entities will identify Members they recommend the Office of Care Coordination assign to individual Care Teams. The Office of Care Coordination may create, modify, or eliminate Care Teams as Care Plus Program needs require.

H. Information Uses

H.1 Authorization to Share Information

Participating Entities and Members may share confidential client information for Care Plus Program purposes and as allowed by law or a client's written authorization. Client Authorization Forms shall be retained and accessible to Participating Entities and Members in Compass OC. No client confidential information may be shared or disclosed except to the extent permitted by client authorization or applicable law.

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H.2 Confidentiality Agreements

Each Participating Entity must enter an Office of Care Coordination-approved Participating Entity agreement before it may access or share confidential client information in Compass OC or through the Care Plus Program. Each Member must enter an Office of Care Coordination-approved confidentiality agreement that includes general use, security safeguards, acceptable use, and enforcement policies before he or she may access or share confidential client information in Compass OC or through the Care Plus Program. The Office of Care Coordination and Participating Entity shall preserve all Participating Entity and Member agreements for a minimum of seven years from date of entry.

H.3 Access to Confidential Information

The Office of Care Coordination is responsible for controlling access to Compass OC and for ensuring confidential information in the Care Plus Program, including information available on Compass OC, shared with Participating Entities and Members is consistent with applicable law or Client authorization and only as necessary for Care Plus Program purposes. The Privacy Governance Committee shall develop specific Compass OC protocols to ensure the privacy and security of confidential Client information is maintained.

I. Security Controls

I.1 Participating Entities

Participating Entities must employ security controls that meet applicable state and federal standards, including reasonable administrative, technical, and physical safeguards to ensure data confidentiality, integrity, and availability to prevent unauthorized or inappropriate access, use, or disclosure. These controls must ensure the information contained in Participating Entities' databases is complete, accurate, and up to date to the extent necessary for the Participating Entities' intended purposes and that the information has not been altered or destroyed in any manner. Participating Entities may establish their own policies and procedures governing their Members and information maintained in their databases or systems. Participating Entity policies and procedures shall not conflict with this Policy.

I.2 Office of Care Coordination

The Office of Care Coordination shall employ at a regular frequency auditing, monitoring, and reporting tools for Compass OC. The office shall specifically monitor Compass OC for unauthorized acquisition, access, use or disclosure of PII which compromises the security, privacy, or integrity of such information. Any unauthorized acquisition, access, use or disclosure shall constitute a Security Incident and shall be managed through the Office of Care Coordination security incident management system. Any unauthorized acquisition, access, use or disclosure of PII that has compromised the security, privacy, or integrity of such information shall be treated as a Breach and be managed as stated in this Policy.

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J. Records Management

Participating Entities must maintain a records retention schedule for the information in their databases. The Office of Care Coordination must maintain a records retention schedule for the Care Plan that is consistent with the County of Orange Records Management Policy. The Office of Care Coordination is responsible for administering subpoenas and requests related to the Care Plan. Participating Entities are responsible for administering subpoenas and requests for records or information maintained in their databases.

K. Breach of Confidential Information

K.1 Identification and Reporting of Privacy and/or Security Incidents

Each Participating Entity and Member must report to the Office of Care Coordination any Privacy and/or Security Incidents (Incidents) of client confidential information upon discovery and follow the procedures outlined in the Compass OC Incident Management Policy. Incidents of Client confidential information may be reported by contacting the Office of Care Coordination at careplusprogam@ceo.oc.gov.

K.2 Investigation of Incidents

The Office of Care Coordination, in consultation with the County Privacy Officer and Privacy Governance Committee as applicable, will investigate each Incident report. The investigation will include the following: determining the scope of the incident; identifying the Participating Entity or Participating Entities whose confidential information was subject to an unauthorized acquisition, access, use or disclosure; working with the subject Participating Entity or Participating Entities to ensure compliance with applicable legal and entity incident or Breach protocols; determining whether the incident resulted in a Breach; and, establishing whether operational changes are necessary to mitigate the risk of future Breaches. Each Participating Entity and Member must cooperate with the Office of Care Coordination's investigation.

K.3 Prohibition on Retaliation

Retaliation against any Member or Participating Entity who in good faith reports an Incident or violation of this Policy is prohibited. In addition, retaliation against any Member or Participating Entity who cooperates in an Office of Care Coordination investigation related to this Policy is prohibited.

L. Training

Each Member must annually complete the Office of Care Coordination-approved information privacy and security training prior to participating in the Care Plus Program. The training must provide training on federal and state laws applicable to Participating Entities' obligations to protect confidential information in their databases, including AB 210, the Health Insurance Portability and Accountability Act (HIPAA), the Confidentiality of Medical Information Act (California Civil Code section 56, et. seq.), the California the Lanterman-Petris-Short (LPS) Act (California Welfare and Institutions Code section 5000 et seq.), Welfare and Institutions Code section 10850 (welfare services), and Penal Code section

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13300 (local summary criminal information). The County of Orange Enterprise Privacy and Cybersecurity Program shall present Information privacy and security training via a remote learning management system. Participating Entities and the County Privacy Office must keep verification of all Members' successful completion of information privacy and security training on file for a minimum of seven years.

M. Amendments

The Privacy Governance Committee may amend this Policy. Policy amendments will identify their effective dates. The Office of Care Coordination shall notify Participating Entities and Members of Policy amendments.

N. Change History

#	Version Updated Date	Description	Reviewed By
2	August 2025	New Data Platform and Updates to Care Plus Program	Julie Bechtol, Zulima Lundy, Linda Le