CDSS CALIFORNIA DEPARTMENT OF SOCIAL SERVICES | TSI | CDPH California Department of Public Health | DHCS CALIFORNIA DEPARTMENT OF HEALTH CARE SERVICES | California Department of AGING | DDS Department of Developmental Services

Quick Reference Guide (QRG)

Protecting Personally Identifiable Information (PII) and Personal Health Information (PHI) by Maintaining Correct Provider Associations to Jurisdictional Entities (JEs)

Table of Contents

Provider-Jurisdictional Entity (JE) Data Associations

Providers share data for Electronic Visit Verification (EVV) with JEs under the following scenarios:

1. **Provider Identifier Selection**:
    a. During Self-Registration, providers choose the JE as their Provider Identifier when adding their Provider Identifiers.
    b. For providers who have completed self-registration, they update their Provider Identifiers through the "Manage Provider Identifier" process.
2. **Client-Payer Section**:
    a. CalEVV Providers: Providers select a JE in the client-payer section when creating or updating a client record.
    b. Alternate EVV (AltEVV) Providers: Providers also share data with the JE when submitting an authorization for the client.

Providers are at risk for a data breach if they associate their EVV data with a JE to whom they do not contract (bill services). Data breaches occur when client or visit information is improperly viewable by a JE that does not have authorization to view the information. **Note:** Such a data breach may constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA), which results in the imposition of civil monetary penalties against the entity and/or disenrollment from Medi-Cal.

Providers and JEs can monitor any data associations through authorizations using the *Authorization Report* in the CalEVV Aggregator. The Authorization Report shows each client, the client's JE association, and the authorized service for each provider.

JEs can monitor any data associations through Provider Identifiers using the *Provider Listing Report* in the CalEVV Aggregator. The Provider Listing Report shows a list of providers associated with that JE. Authorized users for JEs can also use the following cards in BI Tool (Domo):

1. **Provider Card**: Lists the providers who have linked to their JE in Provider Identifiers.
2. **Client Card**: Lists the clients who have been linked to their JE in the client-payer section (authorization).
3. **Visits Card**: Lists visits submitted for clients who have been linked to their JE in the client-payer section (authorization).

Step 1: Identify and Report

If a JE observes provider or client information that is not associated with their JE in the CalEVV Aggregator or Business Intelligence (BI) Tool, they are:

1. Contact the provider to correct the link by updating their Provider Identifiers, authorizations for the impacted client, or both.
2. Report the incident promptly to their respective state department. The state department will work with Sandata, the contracted provider of the state's EVV systems, to assist the provider with removing incorrect data associations and any affected visits.

Step 2: Immediate Reporting

In the event of a data integrity concern, please follow the process for your respective state department using the steps identified below.

Department of Health Care Services (DHCS)

a. Report incidents to DHCS as soon as possible:
   - Email DHCS Data Integrity Reporting Policies: incidents@dhcs.ca.gov
     - CC DHCS EVV: EVV@dhcs.ca.gov
b. Submit incident reports to the DHCS Privacy Incident Reporting Portal
c. Please follow your entity's data integrity reporting policies

Department of Developmental Services (DDS) – Regional Centers

a. Report incidents to DDS within 72 hours of the occurrence with a brief description of the incident:
   - Email DDS Information Security Office: ISO@dds.ca.gov
     - CC DDS EVV: EVV@dds.ca.gov
b. Please follow your entity's data integrity reporting policies

California Department of Aging (CDA) – Multipurpose Senior Services Program (MSSP) and Community-Based Adult Services (CBAS)

a. Report incidents to CDA as soon as possible, but no later than 72 hours of the occurrence, with a brief description of the incident: EVV@aging.ca.gov
b. Submit a completed Information Security Incident Report Part A, CDA 1025A form
c. Please follow your entity's data integrity reporting policies

California Department of Public Health (CDPH) – Medi-Cal Waiver Program (MCWP)

a. Report incidents to CDPH as soon as possible, but no later than 15 days of the occurrence, with a brief description of the incident:

- Send to CDPH Privacy Office: Privacy@cdph.ca.gov or 1415 L Street, Suite 500, Sacramento, CA 95814
- Email or CC CDPH EVV: CDPHMCWP@cdph.ca.gov

b. Please follow your entity's data integrity reporting policies

Step 3: Data Breach is Confirmed

If the state department confirms a data breach has occurred, the state department will work with the affected provider to submit a customer service ticket to Sandata. The state department will keep the JE apprised of the progress to resolve the incorrect data association(s).

Note: JEs, dependent on guidance from the state department, may be responsible for providing technical assistance to their provider to correct Provider Identifiers and client-payer associations.

Sandata will take the following steps:

a. Sandata will place a temporary hold on the JE's access to the CalEVV Aggregator and BI Tool to prevent further unauthorized data access.
b. Sandata will provide technical assistance to the provider to manage Provider Identifiers and to correct any current or past client-payer records with the incorrect JE associations.
c. In the event a provider is unable to edit past authorizations, Sandata will provide technical assistance by editing any past authorizations containing incorrect JE associations by adding an end-date to the authorization and/or removing the JE association, as appropriate.

Step 4: Restoring Access

The JE will be granted access back to the CalEVV Aggregator and BI Tool after the provider has completed all corrections to Provider Identifiers and client-payer associations, and any incorrectly submitted visits have been removed from the system. If the provider fails to take timely, reasonable action to correct the associations in their data, the provider will be considered out of compliance with state and federal EVV requirements and subject to actions identified in the Welfare and Institutions Code section 14043.51[1].

[1] Welfare and Institutions Code section 14043.51

Technical Assistance

For troubleshooting support, please contact Sandata customer care:

- CalEVV providers may contact Sandata CalEVV Support at CACustomerCare@sandata.com
- Providers using an Alternate EVV (AltEVV) system may contact Sandata AltEVV Support at CAAltEVV@sandata.com

Additional Resources

Providers using an AltEVV system can share the following resources with their AltEVV Vendor to ensure the vendor is submitting data in the correct format:

- CalEVV Vendor Technical Specifications
- CalEVV Specification User Guide