



California  
Department of  
Health Services

**SANDRA SHEWRY**  
*Director*

State of California-Health and Human Services Agency  
**Department of Health Services**



**ARNOLD SCHWARZENEGGER**  
Governor

November 10, 2005

N.L.: 29 -1105  
INDEX: HIPAA

TO: ALL CALIFORNIA CHILDREN'S SERVICES (CCS) COUNTY  
ADMINISTRATORS, CHIEF/SUPERVISING THERAPISTS, MEDICAL  
DIRECTORS/CONSULTANTS, STATE CHILDREN'S MEDICAL  
SERVICES (CMS) BRANCH STAFF

SUBJECT: CHANGES TO THE CCS NOTICE OF PRIVACY PRACTICES

## **I. BACKGROUND**

Under the administrative simplification provisions of the HIPAA, the CCS program is a health plan, and thus is a HIPAA covered entity. The HIPAA Privacy Rule, which has a compliance date of April 14, 2003, requires covered entities to inform CCS clients or their legal representatives on how their protected health information (PHI) will be disclosed, and what their rights are with regard to their PHI. The procedures for distribution of the CCS NPP to CCS clients are contained in N.L. 11-0703 dated July 24, 2003.

## **II. POLICY**

In accordance with the HIPAA Privacy Rule, 45 CFR 164.520, the CCS program has the right to make changes to the Notice of Privacy Practices (NPP), and is required to provide CCS clients or their legal representatives with a new NPP.

## **III. POLICY IMPLEMENTATION**

The contact information of the California Department of Health Services, Privacy Officer has changed. Specifically, the telephone number of the Privacy Officer has changed to **(916) 445-4646** (voice). In addition, the address has changed to **Privacy Officer, California Department of Health Services, P.O. Box 997413, MS 0010, Sacramento, CA 95899-7413**. These changes are located on page 4 of the revised CCS NPP, attached to this numbered letter.

N.L.: 29-1105  
Page 2  
November 10, 2005

All other information on the attached CCS NPP remains the same as the previously issued NPP. The revised CCS NPP may be accessed through the CMS Branch website at [www.dhs.ca.gov/pcfh/cms/ccs](http://www.dhs.ca.gov/pcfh/cms/ccs) in both English and Spanish.

All county CCS programs are to distribute the revised CCS NPP to their CCS clients or their clients' legal representatives, and are to document this distribution in their clients' case records.

Additionally, all county CCS programs are to provide the revised CCS NPP to all new applicants for CCS program services at or prior to the time the CCS program changes their status to "active". County CCS programs are to annotate the applicant's CCS case record with the date that the revised CCS NPP was provided to the applicant or the applicant's legal representative (e.g., parent or legal guardian).

All county CCS programs, and their CCS clients or legal representatives are to comply with the policies and procedures as specified in this numbered letter, and as specified in the CCS Numbered Letter No.: 11-0703, dated July 24, 2003, which may be accessed at the CMS Branch website: [www.dhs.ca.gov/pcfh/cms/ccs](http://www.dhs.ca.gov/pcfh/cms/ccs).

All County CCS programs may choose to develop their own CCS NPP, provided that the county developed CCS NPP is approved by the county legal counsel and conforms to:

- a. Sections 520 et.seq., part 164, volume 1, Title 45 code of Federal Regulations,
- b. Sections 41670, Title 22, California Code of Regulations, and;
- c. Section 1. 4.2b of the CCS Procedural Manual.

If you have questions about this numbered letter, please contact your CCS administrative consultant.

**Original signed by Marian Dalsey, M.D., M.P.H.**

Marian Dalsey, M.D., M.P.H., Acting Chief  
Children's Medical Services Branch

Enclosures