

State of California—Health and Human Services Agency **Department of Health Care Services** 



GOVERNOR

November 17, 2021

Medi-Cal Eligibility Division Information Letter No.: 21-34

TO: ALL COUNTY WELFARE DIRECTORS ALL COUNTY ADMINISTRATION OFFICERS ALL COUNTY PRIVACY AND SECURITY OFFICERS ALL COUNTY MEDS LIAISONS ALL COUNTY MED-CAL PROGRAM SPECIALISTS/LIAISONS

SUBJECT: Guidance for MEDS Activity Statistical Report (MASR) Usage and Compliance with Medi-Cal Privacy and Security Agreement (PSA) (Reference: All County Welfare Directors Letter 19-16 or related subsequent letters)

The purpose of this Medi-Cal Eligibility Division Information Letter (MEDIL) is to formally introduce the MASR and to provide guidance for County Welfare Departments (CWDs) to implement its use.

## Background

While assisting in the administration of Medi-Cal, CWDs access Personally Identifiable Information (PII) and Social Security Administration (SSA) data within Medi-Cal Eligibility Data System (MEDS) when determining Medi-Cal eligibility. To ensure the privacy and security of this information, each CWD enters into a Medi-Cal Privacy and Security Agreement (PSA) with DHCS every three years. The PSA documents the county's responsibilities for access, use, and disclosure of Medi-Cal PII.

The Oversight and Monitoring section of the PSA and SSA's Technical Systems Security Requirements within the PSA's Exhibit A require CWDs to perform periodic privacy and security reviews of county workers' use of PII and SSA data. To assist CWDs with this responsibility, DHCS developed and implemented the MASR in November of 2017. MASR is a bi-weekly audit report that provides the CWDs with their users' MEDS usage history. It details the date and time for beneficiary inquiries, MEDS screens that were accessed, and any update transactions that were completed. This is useful for monitoring MEDS users with "Read-only" access levels.

The report files are distributed via SFTP to each county's authorized privacy and security contacts following DHCS's established MASR schedule. They are only retained online for 12 weeks, so authorized individuals should download these files on a regular basis.

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## Access to MASR

Each CWD shall designate up to three privacy and security staff with the ability to download the MASR files for performing oversight duties. Authorized individuals are provided login credentials, instructions for downloading the files, a list of MEDS transactions definitions, and the annual MASR delivery schedule.

SSA requires DHCS to enforce a separation of duties, excluding any individual who uses MEDS to make benefit or entitlement determinations from participating in oversight, monitoring, or quality assurance functions. For this reason, DHCS periodically reviews our lists of CWD authorized MASR contacts to ensure they do not possess a MEDS account. If it is identified, individuals will be notified by DHCS so that the conflict can be addressed.

All MASR access requests, including adding or deleting users and password resets, can be submitted to DHCS via the County PSA mailbox at <u>CountyPSA@dhcs.ca.gov</u>.

## Use of MASR

As required by the PSA, counties shall implement reasonable systems for the discovery and prompt reporting of any breach or security incident. The MASR should be used by CWDs to monitor their county workers' compliance with the privacy and security requirements within the PSA and each county's individual policies and procedures governing Medi-Cal PII. The information can also be cross-referenced against other systems or reports to identify instances in which PII and SSA data is accessed by a user without a business need. Regular reviews of users' action within MEDS and other systems that store PII provide an awareness of suspicious or abnormal activity that could alert the CWD of a security incident or breach. CWDs shall follow the steps within the PSA to report all PII breach or security incidents to DHCS timely.

If you have any questions, or if we can provide further information, please submit inquiries via email at <u>CountyPSA@dhcs.ca.gov</u>.

Original Signed By

Yingjia Huang Assistant Deputy Director Health Care Benefits and Eligibility Department of Health Care Services