



JENNIFER KENT
Director

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



EDMUND G. BROWN JR.
Governor

October 5, 2016

Letter No.: 16-19

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY MEDI-CAL PROGRAM SPECIALISTS/LIAISONS
ALL COUNTY WELFARE ADMINISTRATIVE OFFICERS
ALL COUNTY HEALTH EXECUTIVES
ALL COUNTY MENTAL HEALTH DIRECTORS
ALL COUNTY MEDS LIAISONS

SUBJECT: County Compliance Date for the 2016 Medi-Cal Privacy and Security, Exhibit A, Attachment - Technical System Security Requirements, version 7.0
(Reference: All County Welfare Directors Letter (ACWDL) 16-09)

The purpose of this letter is to notify County Welfare Departments (CWDs) of the compliance date for the 2016 Medi-Cal Privacy and Security Agreement, Exhibit A, Attachment - Technical System Security Requirements, version 7.0, and to inform CWDs of upcoming Department of Health Care Services' (DHCS) Security Compliance Reviews agreed upon by County Welfare Directors Association (CWDA) and their County Review Team.

Background

Prior ACWDL 16-09 provided CWDs with a template and instruction for completing the 2016 Medi-Cal Privacy and Security Agreement (Agreement), as required by the Social Security Administration (SSA). The Agreement includes two incorporated exhibits:

- **Exhibit A** - Computer Matching and Privacy Protection Act Agreement between SSA and California Health and Human Services Agency, and Information Exchange Agreement between SSA and DHCS with Attachment "Electronic Information Exchange Security Requirements for State and Local Agencies Exchanging Electronic Information with SSA (TSSR)."
- **Exhibit B** - Computer Matching Agreement between; Department of Homeland Security, United States Citizenship and Immigration Services and California Department of Health Care Services.

Exhibit A includes an attachment, the *Electronic Information Exchange Security Requirements for State and Local Agencies Exchanging Electronic Information with the SSA*, which specifies the SSA's most current Technical System Security Requirements (TSSR), version 7.0, July 2015.

Compliance

The SSA requires DHCS and CWDs to be compliant with the TSSR version 7.0 because DHCS and CWDs view SSA-provided information during the Medi-Cal eligibility determination process. All 58 counties are required to comply with the TSSR version 7.0 to ensure the continued transmission of Personally Identifiable Information (PII) between the counties and DHCS. DHCS requests that each CWD be in compliance with the TSSR version 7.0, by December 1, 2016.

Security Compliance Reviews

The SSA also requires DHCS perform ongoing Security Compliance Reviews of its contractors and agents at least triennially and provide documentation of these reviews to SSA upon request. In support of this requirement, during early 2017 DHCS will begin contacting each CWD and request completion of a County Compliance Review Questionnaire (CRQ). This CRQ will be based upon the TSSR version 7.0 and will be scoped to only include TSSR requirements which may be applicable to the CWDs. If CWDs identify any compliance gaps, DHCS will work with the county to document a corrective action plan. This will be included in the CRQ in order to demonstrate to SSA that an active plan is in place to correct any deficiencies.

In the event that you need to contact DHCS regarding any of the information in this letter, please submit via e-mail to the community PSA inbox at CountyPSA@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Sandra Williams, Chief
Medi-Cal Eligibility Division