

**SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



**ITEM: 3.7**  
(ID # 23074)

**MEETING DATE:**

**FROM :** EXECUTIVE OFFICE:

Tuesday, September 26, 2023

**SUBJECT:** EXECUTIVE OFFICE (EO): Approve as to form the Riverside County AB 210 Protocol, Uniform Policies and Procedures, Employee Confidentiality Statement and Participating Agency Agreement with multiple participating agencies for the Riverside County Homeless Adult and Family Multidisciplinary Personnel Teams, as a part of the Integrated Services Delivery Initiative; All Districts. [Total Cost \$0]

**RECOMMENDED MOTION:** That the Board of Supervisors:

1. Approve as to form the Riverside County AB 210 Protocol, Uniform Policies and Procedures, Employee Confidentiality Statement and Participating Agency Agreement with multiple participating agencies for the Riverside County Homeless Adult and Family Multidisciplinary Personnel Teams to be coterminous with Assembly Bill 210 (AB 210);
2. Authorize the Director, or designee, of each Participating Agency to sign the Participating Agency Agreement on behalf of their Department;
3. Authorize DPSS Director or his/her designee, in close collaboration with the participating agencies and the Integrated Service Delivery planning team, to amend the Riverside County AB 210 Protocol, Uniform Policies and Procedures, Employee Confidentiality Statement and/or Participating Agency Agreement as necessary to remain compliant with AB 210 and further the sharing and exchange of confidential information by multidisciplinary teams; and,
4. Authorize the Director, or designee, of each Participating Agency to sign on behalf of their respective department, as approved as to form by County Counsel to: sign amendments that make modifications to the Participating Agency Agreement that stay within the intent of the Agreement including adding participating agencies.

**ACTION:Policy**

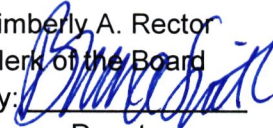
  
Sayori Baldwin, Asst. CEO-Human Services 9/19/2023

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**MINUTES OF THE BOARD OF SUPERVISORS**

On motion of Supervisor Washington, seconded by Supervisor Spiegel and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Jeffries, Spiegel, Washington, Perez and Gutierrez  
Nays: None  
Absent: None  
Date: September 26, 2023  
xc: E.O., DPSS

Kimberly A. Rector  
Clerk of the Board  
By:   
Deputy

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<b>FINANCIAL DATA</b>	<b>Current Fiscal Year:</b>	<b>Next Fiscal Year:</b>	<b>Total Cost:</b>	<b>Ongoing Cost</b>
<b>COST</b>	\$ 0	\$ 0	\$ 0	\$ 0
<b>NET COUNTY COST</b>	\$ 0	\$ 0	\$ 0	\$ 0
<b>SOURCE OF FUNDS: N/A</b>			<b>Budget Adjustment:</b>	No
			<b>For Fiscal Year:</b>	23/24

**C.E.O. RECOMMENDATION:** Approve

**BACKGROUND:**

**Summary**

On December 7, 2021 (item 3.34), the Board authorized the County Executive Office to lead the initiative to fully develop the Integrated and Comprehensive County Health and Human Services System. The initiative aims to incorporate the work, service provision and data of multiple County departments and various community-based organizations into an integrated system aimed at serving vulnerable, high needs residents. The system provides guidelines regarding access to processing and sharing of client data for the purpose of increasing operational efficiencies, leveraging strategic partnerships, streamlining application and case management processes, and developing a client-centered service delivery model. The goal is to improve health, self-sufficiency, recovery and well-being services, and develop holistic, effective and efficient models of person-centered coordinated services among participating agencies.

California Assembly Bill 210 (AB-210) became effective on January 1, 2018, and created section 18999.8 of the Welfare and Institutions Code. This bill permits multidisciplinary personnel teams (MDTs) of Participating Agencies to share and exchange information made confidential by State law to facilitate the expedited identification, assessment, and linkage of homeless adults and families to housing and supportive services within the County.

AB-210 authorizes counties to establish homeless adult and family multidisciplinary teams (MDTs) to facilitate the expedited identification, assessment, and linkage of homeless individuals and families to housing and supportive services. While state laws generally prohibit the sharing of an individual's confidential health, mental health, criminal history, and social services information, AB-210 authorizes MDT members to share such information to improve coordination of housing and supportive services, increase continuity of care, and decrease duplication of services.

In accordance with AB-210, and as part of the Integrated Services Delivery (ISD) Initiative, MDTs will be established to include a wide range of staff from County Departments, affiliated agencies such as housing authorities or contracted homeless service providers, other governmental agencies, and non-governmental agencies that have as one of their purposes the identification, assessment, and linkage of homeless individuals to housing and services.

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All participating agencies must sign a Participating Agency Agreement. Participating agency staff must complete the AB-210 training and sign a confidentiality agreement to begin sharing information.

The following categories of information may be shared under AB-210:

- Demographic Information
- Contact Information
- Service and Program History
- Medical History
- Mental Health History
- Disability Status
- Housing and Homeless History and Status
- Benefit History and Status
- Criminal History and Status
- Probation Status
- Domestic Violence Status
- Employment and Educational History and Status
- High Risk Behavior, Violence, or Aggression History

AB-210 authority does not supersede any federal laws or regulations. The County's AB-210 Protocol and Countywide Policies and Procedures include specific restrictions on information sharing under the law. Maintaining confidentiality remains fundamental. MDT members must be familiar with their own agency's confidentiality policies, in addition to the Countywide Policies and Procedures.

**Impact on Residents and Businesses**

This collaborative partnership ensures effective evidence-based services in a comprehensive and culturally responsive manner. It provides better quality service delivery to homeless individuals and families. Increased ability to match homeless clients to appropriate services and



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housing and reduced costs to County systems by decreasing duplication of services to homeless clients and improving targeting of interventions.

**ATTACHMENTS:**

- Attachment A:** Riverside County Draft AB 210 Participating Agency Agreement
- Attachment B:** Riverside County Draft AB 210 Employee Confidentiality Statement
- Attachment C:** Riverside County Draft AB 210 Protocol
- Attachment D:** Riverside County Draft AB 210 Policies and Procedures

  
Erianna Lontajo, Principal Management Analyst 9/19/2023

  
Gregg Gu, Chief Deputy County Counsel 9/14/2023



**Riverside County Uniform Policies and Procedures**  
**AB 210 Homeless Adult and Family Multidisciplinary Teams**

AB 210 authorizes counties to establish homeless adult and family multidisciplinary teams (MDTs) to facilitate the expedited identification, assessment, and linkage of homeless individuals and families to housing and supportive services within the County. It allows provider agencies to share otherwise confidential information in order to coordinate services, ensure continuity of care, and reduce duplication of services. The following policies and procedures are intended to ensure that all agencies participating in AB 210 MDTs comply with the AB 210 statute and protocol.

**1.0 Purpose**

The purpose of AB 210 is to allow for sharing of confidential information in order to facilitate the expedited identification, assessment, and linkage of homeless individuals and families to housing and supportive services within the County and to allow provider agencies to share confidential information for the purpose of coordinating housing and supportive services to ensure continuity of care.

**2.0 Protocol and Participating Agency Agreement**

AB 210 requires each county wishing to implement AB 210 to establish a protocol, which governs the information sharing authorized under the law. Agencies wishing to participate in Riverside County AB 210 MDTs must sign a Participating Agency Agreement, and thereby commit to abide by the Riverside County AB 210 Protocol. All Participating Agency staff should review the Protocol carefully.

**3.0 Agency Supplemental Policies and Procedures**

In addition to these Countywide Policies and Procedures, Participating Agencies may establish their own Supplemental Policies and Procedures, which shall not conflict with the Uniform Policies and Procedures. Participating Agencies must share any Supplemental Policies and Procedures they create with Department Public Social Services – Director or his/her designee.

**4.0 Formation of team**

- 4.1 AB 210 MDTs are comprised of two or more team members. Teams may exist on an ongoing basis (Ongoing AB 210 MDTs) or be formed in order to serve a particular client or clients (Client-specific MDTs).
- 4.2 Ongoing AB 210 MDTs may consist of personnel who are eligible to participate in AB 210 MDTs who work together on an ongoing basis and need to regularly share information in order to effectively serve their clients. For example, outreach teams may form ongoing AB 210 MDTs.
- 4.3 Ongoing AB 210 MDTs may also be engaged in broader data sharing efforts, such as generating a list of high utilizers of County services in order to prioritize serving

such individuals and/or families, or aggregating data to track progress of County efforts to serve homeless individuals and families.

- 4.4 Client-specific AB 210 MDTs may form when authorized individuals establish contact with one another, verify their eligibility to participate in an MDT, and engage in information sharing. For MDT members who are not familiar with one another, verification of eligibility to participate in an MDT will be established through either an automated data system or by contacting designated point persons at each agency who are able to assess eligibility and facilitate information sharing. Teams are disbanded when information sharing about a client is no longer necessary.

## **5.0 Information that can be shared under AB 210**

- 5.1 The members of AB 210 MDTs may share information that may be designated as confidential under State law, policy, or regulations, if they believe it is generally relevant to the identification, assessment, and linkage of homeless adults and families to housing and supportive services, provided that no information may be shared in a manner prohibited by federal law or regulations.
- 5.2 Homeless is defined as any recorded instance of an adult or family self-identifying as homeless within the most recent 12 months, or any element contained in service utilization records indicating that an adult or family experienced homelessness within the most recent 12 months.
- 5.3 The categories of information to be shared under AB 210 are identified in Attachment A of the Protocol. There may be information that falls outside of the categories that is permissible to share. Moreover, no Participating Agency is required to share any information simply because it falls into one of the categories.
- 5.4 Participating Agencies are expected to make reasonable efforts to share the minimum necessary information. Agencies may decide to share different information depending on the method of information sharing or may determine that different information may be shared by different personnel.
- 5.5 Regardless of the type of information to be shared, personnel participating in an AB 210 MDT are required to ensure to the best of their abilities that information shared is complete, accurate, and up to date.

## **6.0 Restrictions on information sharing and information uses**

- 6.1 AB 210 does not supersede any federally mandated restrictions on information sharing. All personnel participating in MDTs must be familiar with the laws affecting their ability to share information under AB 210 and must comply with the letter and intent of these laws.
- 6.2 Testimony concerning information shared under AB 210 is not admissible in any criminal, civil, or juvenile court proceeding, notwithstanding any other law.

Further, information and writings shared pursuant to this protocol shall be protected from discovery and disclosure by all applicable statutory and common law protections.

- 6.3 Representatives of domestic violence service organizations must obtain clients' consent in order to share confidential information regarding a domestic violence victim or the victim's family.
  - 6.3.1 Domestic violence service organizations must establish a policy delineating how they will obtain clients' consent, how frequently consent will be renewed, how consent will be tracked, and any other pertinent issues necessary to ensure appropriate consent has been secured prior to information sharing under AB 210.
  - 6.3.2 Records of Consent shall be maintained by the client's respective MDT Participating Agency.
- 6.4 Unless there is written authorization from the patient, in accordance with all applicable laws, RUHS Behavioral Health and its contractors shall not provide any information related to Part II substance use disorder treatment programs.
- 6.5 If a law enforcement official contacts an MDT member to request PII and/or PHI about a client who is not in the custody of the law enforcement agency, the MDT member shall direct the official to contact DPSS ASD Liaison, who shall coordinate the request with County Counsel.

## **7.0 How information can be shared**

- 7.1 AB 210 MDTs may share information through "person-to-person" mechanisms, including one-on-one telephone or in-person conversations, electronic communications, and other modes of communication.
- 7.2 AB 210 MDTs may share information through the use of automated systems that facilitate exchange of data and other information.
- 7.3 AB 210 MDTs may share information through the exchange of data files in order to aggregate data to enhance service provision quality and efficiency, and to monitor system outcomes.

## **8.0 Confidentiality**

- 8.1 Ensuring confidentiality of information regarding homeless individuals and families is of critical importance. All Participating Agency personnel will be subject to the same confidentiality requirements as one another. All information shared between AB 210 MDT participants is private and confidential.
- 8.2 All Participating Agency personnel must sign a confidentiality statement prior to participating in AB 210 MDTs.



- 8.3 Participating Agencies must keep all personnel members' signed confidentiality statements on file for the duration of each personnel member's participation in AB 210 MDTs.
- 8.4 If a personnel member changes employer, and the new employer is also a Participating Agency, the personnel members must sign a new confidentiality statement.

## **9.0 Breaches**

- 9.1 The follow definitions apply to this section:
  - 9.1.1 Breach: The term "breach" means the unauthorized acquisition, access, use, or disclosure of PII and/or PHI which compromises the security, privacy or integrity of such information.
  - 9.1.2 Personally Identifiable Information (PII): PII is any information that identifies or describes an individual, including, but not limited to, names Social Security number, date of birth, physical description, home address, telephone number, education, financial matters, medical, or employment history. PII applies to all Multidisciplinary Teams who maintain such information.
  - 9.1.3 Protected Health Information (PHI): PHI is 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, Social Security number that is transmitted or maintained in any form or medium, including electronic, written, or verbal. (Note that the term PHI is not applicable to all medical information and it applies only to HIPPA-covered entities and their business associates.)
- 9.2 The following procedures apply in the event of a breach or potential breach.
  - 9.2.1 If a Multidisciplinary Team (MDT) member discovers or becomes aware of a Breach or potential Breach of PII or PHI, they must immediately (same business day) report the Breach to their department's respective privacy security liaison.
  - 9.2.2 Following the initial notice of the discovery of a potential Breach, the respective Department's privacy liaison will coordinate efforts with their respective Compliance and Privacy representative and/or Riverside County Chief Compliance and Privacy Officer to investigate and mitigate the Breach.
- 9.3 For further information on Riverside County policies regarding breaches, please see: Riverside County Board Policy B-23 (Health Privacy Policy) and respective Department specific policies.

## **10.0 Training**

- 10.1 All Participating Agency personnel must complete an AB 210 training prior to participating in AB 210 MDTs. AB 210 training must be completed annually for ongoing participation.
- 10.2 Participating Agencies must keep verification of all personnel members' successful completion of an AB 210 training on file for the duration of the personnel member's participation in AB 210 MDTs.
- 10.3 If a personnel member changes employer, and the new employer is also a Participating Agency, training does not need to be repeated if the personnel member completed an AB 210 training while in the position occupied immediately prior to taking a new position. However, the personnel member must obtain verification of successful training completion from the previous employer and the new employer must keep this verification on file.
- 10.4 AB 210 trainings will be presented via webinar and made widely available through County and other learning management systems.

## **11.0 Information security**

- 11.1 Information shared electronically by County Departments under AB 210 is subject to Riverside County Board Policy B-23 – Health Privacy Policy in addition to respective Department specific policies and applicable State and Federal regulations.

## **12.0 Inquiries about and changes to Policies and Procedures**

- 12.1 Any inquiries about these Policies and Procedures should be directed to Department of Public Social Services – Director or his/her designee.
- 12.2 Any changes to these Policies and Procedures will be approved by Department of Public Social Services – Director or his/her designee, in close collaboration with the participating agencies and the Integrated Service Delivery planning team. All Participating Agencies will receive a copy of revised Policies and Procedures upon such approval.

**RIVERSIDE COUNTY AB 210 PROTOCOL  
GOVERNING INFORMATION SHARING BY HOMELESS ADULT AND FAMILY  
MULTIDISCIPLINARY PERSONNEL TEAMS**

The State Legislature has recognized that the exchange of otherwise confidential information within multidisciplinary personnel teams is critically important to facilitating the expedited identification, assessment, and linkage of homeless adults and families to housing and supportive services within Riverside County.

The County and each of the agencies participating in this protocol are committed to preserving and maintaining the confidentiality of the information to be exchanged under this protocol by limiting the disclosure of such information to that which has been determined to be generally relevant to the identification, assessment, and linkage of homeless individuals and families to housing and supportive services; by preventing unauthorized access to or disclosure of such information; and by ensuring safeguards are in place to protect the confidentiality and security of such information.

**1.0 Purpose of this Protocol**

This protocol is drafted and implemented in accordance with Welfare and Institutions Code (WIC) section 18999.8 and is specifically intended to apply to the sharing of confidential information by the homeless adult and family multidisciplinary personnel teams established pursuant to that section. The sharing of confidential information pursuant to this protocol is intended to facilitate the expedited identification, assessment, and linkage of homeless individuals to housing and supportive services within the County and to allow provider agencies to share confidential information for the purpose of coordinating housing and supportive services to ensure continuity of care. This protocol is also intended to ensure that confidential information gathered by the team is not disclosed in violation of State or federal law.

**2.0 Definitions**

Unless otherwise indicated, the terms used in this protocol shall have the same meaning as in Welfare and Institutions Code section 18999.8.

**3.0 Participating Agencies**

- 3.1 Riverside County Departments, their contracted agency providers, other governmental agency partners, and any other agencies/organizations that has, as one of its purposes, the identification, assessment, and linkage of homeless individuals to housing and supportive services to homeless adults or families within the County, may become "Participating Agencies" subject to this protocol. Participating Agencies are identified in Attachment B, which may be updated from time to time.
- 3.2 Additional County Departments, Contracted Agencies, Governmental Agencies, and Partner Agencies may be added as a Participating Agency



upon approval by Department Public Social Services – Director or his/her designee and compliance with applicable terms herein.

- 3.3 Agencies will sign a Participating Agency Agreement to certify their participation and commitment to abide by all requirements in the Agreement.
- 3.4 All Participating County Departments will receive notice if a Participating County Department elects to cease participation or when an additional County Department becomes a Participating Agency.

#### **4.0 Establishment of the Multidisciplinary Personnel Teams**

- 4.1 Personnel of any Participating Agency shall be eligible to participate as members of a homeless adult and family multidisciplinary team if they are trained in the identification and treatment of homeless adults and families and are qualified to provide services related to homelessness. The multidisciplinary personnel team may include, but is not limited to, the following categories of persons:
  - 4.1.1 Mental health and substance abuse services personnel and practitioners or other trained counseling personnel, in accordance with 42 U.S.C. 290dd–2(g).
  - 4.1.2 Police officers, probation officers, or other law enforcement agents.
  - 4.1.3 Legal counsel for the adult or family representing them in a criminal matter.
  - 4.1.4 Medical personnel with sufficient training to provide health services.
  - 4.1.5 Case managers or case coordinators responsible for referral, linkage, or coordination of care and services to adults or families.
  - 4.1.6 Social services workers with experience or training in the provision of services to homeless adults or families or funding and eligibility for services.
  - 4.1.7 Veterans services providers and counselors.
  - 4.1.8 Domestic violence victim service organizations, as defined in subdivision (b) of Section 1037.1 of the Evidence Code and Pen. Code, §§ 13752 subds. (a)-(b) & 13753 subds. (a)-(b).
  - 4.1.9 Any public or private school teacher, administrative officer, or certified pupil personnel employee.

4.1.10 Housing or homeless services provider agencies and designated personnel.

4.2 Personnel may be designated as a member of a homeless adult and family multidisciplinary team for a particular case, and in such capacity may receive and disclose relevant information and records, within the MDT, subject to the requirements of this Protocol.

**5.0 Information/Data Items that May be Disclosed and Exchanged among Members of the Homeless Adult and Family Multidisciplinary Personnel Team**

5.1 The members of the homeless adult and family multidisciplinary personnel team may disclose to and exchange with one another, information that may be designated as confidential under State law, if the members of the homeless adult and family multidisciplinary personnel team possessing that information reasonably believe it is generally relevant to the identification, assessment, and linkage of homeless adults and families to housing and supportive services, provided that no information may be shared in a manner prohibited by federal law or regulations.

5.1.1 “Relevant” information shall include any information that has any tendency to assist a homeless adult and family multidisciplinary personnel team to identify, assess, and link homeless adults and families to housing and supportive services. Examples of relevant information that would be deemed shareable by and between MDTs, include but are not limited to those items of information listed on Attachment A.

5.1.2 Representatives of domestic violence victim service organizations, as defined in subdivision (b) of Section 1037.1 of the Evidence Code, shall obtain a domestic violence victim’s informed consent, in accordance with all applicable state and federal confidentiality laws, before disclosing information regarding a domestic violence victim or the victim’s family.

5.1.3 Unless there is written authorization from the patient, in accordance with all applicable laws, RUHS Behavioral Health and its contractors shall not provide any information related to Part II substance use disorder treatment programs, pursuant to 42 U.S.C. 290dd-2(g).

5.2 Participating Agencies shall take reasonable steps to ensure information is complete, accurate, and up to date to the extent necessary for the agency’s intended purposes and that the information has not been altered or destroyed in an unauthorized manner.

- 5.3 No confidential information or writings shall be disclosed to persons who are not members of the homeless adult and family multidisciplinary personnel team, except to the extent required or permitted under applicable law.
- 5.4 Information and writings shared pursuant to this protocol are confidential. Testimony concerning the information and writings shared pursuant to this protocol is not admissible in any criminal, civil, or juvenile court proceeding. Further, information and writings shared pursuant to this protocol shall be protected from discovery and disclosure by all applicable statutory and common law protections. In addition, law enforcement shall not use any information obtained via AB 210 for purposes other than to identify, assist, and link homeless individuals and families with housing and supportive services.

#### **6.0 How Information May be Shared**

- 6.1 Information may be shared by and between MDT members in person, as well as telephonically and electronically with adequate verification of the personnel involved in the exchange of information.
- 6.2 Electronic sharing of information/data under this Protocol will be facilitated by existing electronic data systems and electronic data systems that are under development (Data Systems).
- 6.3 Participating Agencies shall comply with the applicable information retention schedule established by County Policy A-43 in accordance with applicable laws.

#### **7.0 Use of Shared Information**

Information shared pursuant to this protocol will be used to facilitate the identification and assessment of homeless adults and families and their linkage to the most appropriate housing and supportive services. The information will be used to keep Participating Agencies informed about the services homeless adults and families are currently receiving or have received in the past. Shared information will be used to coordinate care, ensure continuity of care, and reduce duplication and fragmentation of services.

#### **8.0 Policies and Procedures Addressing Security and Privacy Training**

- 8.1 The County shall maintain written Uniform Policies and Procedures that require security and privacy awareness training for employees who will have access to information pursuant to this protocol.
- 8.2 The Uniform Policies and Procedures shall include a requirement that all persons who have access to information shared by Participating Agencies, sign a confidentiality statement that includes, at a minimum, general use, security safeguards, acceptable use, and enforcement policies.



- 8.3 The Uniform Policies and Procedures shall require that all Participating Agencies employ security controls that meet applicable federal and state standards, including reasonable administrative, technical, and physical safeguards to ensure data confidentiality, integrity, and availability and to prevent unauthorized or inappropriate access, use, or disclosure.
- 8.4 All Participating Agencies shall certify their agreement to abide by the Uniform Policies and Procedures in the Participating Agency Agreement.

## **9.0 Ensuring Confidentiality**

- 9.1 As required by the Uniform Policies and Procedures, Participating Agencies shall employ security controls that meet applicable federal and state standards, including reasonable administrative, technical, and physical safeguards to ensure data confidentiality, integrity, and availability and to prevent unauthorized or inappropriate access, use, or disclosure.
- 9.2 Every member of the homeless adult and family multidisciplinary personnel team who receives information or records regarding adults and families in his or her capacity as a member of the team shall be under the same privacy and confidentiality obligations and subject to the same confidentiality penalties as the person disclosing or providing the information or records. The information or records obtained shall be maintained in a manner that ensures the maximum protection of privacy and confidentiality rights.
- 9.3 Every member of the homeless adult and family multidisciplinary personnel team represent and warrant that it has implemented and will maintain during the term of this MDT administrative, physical, and technical safeguards to reasonably protect private and confidential information, to protect against anticipated threats to the security or integrity of County data, and to protect against unauthorized physical or electronic access to or use of County data. Such safeguards and controls shall include at a minimum:
  - 9.3.1 Storage of confidential paper files that ensures records are secured, handled, transported, and destroyed in a manner that prevents unauthorized access.
  - 9.3.2 Control of access to physical and electronic records to ensure County data is accessed only by individuals with a need to know for the delivery of MDT services.
  - 9.3.3 Control to prevent unauthorized access and to prevent members of the homeless adult and family multidisciplinary personnel team

employees from providing County data to unauthorized individuals.

9.3.4 Firewall protection.

9.3.5 Use of encryption methods of electronic County data while in transit from the County networks to external networks, when applicable.

9.3.6 Measures to securely store all County data, including, but not be limited to, encryption at rest and multiple levels of authentication and measures to ensure County data shall not be altered or corrupted without County's prior written consent. The member of the homeless adult and family multidisciplinary personnel team further represent and warrant that it has implemented and will maintain during the term of this MDT administrative, technical, and physical safeguards and controls consistent with State and federal security requirements.

9.4 Information and records communicated or provided to the team members by all providers and agencies shall be deemed private and confidential and shall be protected from discovery and disclosure by all applicable statutory and common law protections. Existing civil and criminal penalties shall apply to the inappropriate disclosure of information held by the team members.

## **10.0 Implementation and Oversight**

Department Public Social Services, Adult Services Division, will provide oversight and coordination of activities under this protocol and the development and implementation that supports this protocol, in addition to serving as a Participating Agency.

Riverside County Information Technology (RCIT) will assist in the development and implementation of any new County government information system that directly supports the exchange of information under this protocol.

**Relevant Categories of Information to be Shared\***

- Demographic Information
- Contact Information
- Income, Assets, and Resources
- Citizenship/Immigration Data
- Service and Program History
- Medical History
- Mental Health History
- Nutrition Data
- Disability Status
- Housing and Homeless History and Status
- Benefit History and Status
- Criminal History and Status
- Probation Status
- Domestic Violence Status in accordance with Pen. Code, §§ 13752 subds. (a)-(b) & 13753 subds. (a)-(b) and Pen. Code, §§ 13752 subds. (e) & 13753 subds. (e).
- Veteran Status
- Employment and Educational History and Status
- High Risk Behavior, Violence, or Aggression History

\*This list is not exclusive. Members of homeless adult and family multidisciplinary personnel teams (MDTs) may share other information if they believe it is generally relevant to the identification, assessment, and linkage of homeless adults and families to housing and supportive services, provided that no information may be shared in a manner prohibited by federal law or regulations.



### **Participating Agencies**

Participating Agencies may include any governmental or other agency that has, as one of its purposes, the identification, assessment, and linkage of housing or supportive services to homeless adults or families.

Participating Agencies in Riverside County include:

- Department of Public Social Services (DPSS)
- Child Support Services (CSS)
- First 5
- Housing and Workforce Solutions (HWS)
- Office on Aging (OoA)
- Veterans' Services Office (VSO)
- Riverside University Health System (RUHS)
- Contracted Agencies of any of the above-listed Participating Agencies (Contracted Agencies)
- Governmental agencies working in partnership with any of the above- listed Participating Agencies (Governmental Agencies)
- Non-Governmental agencies working in partnership any of the above listed Participating Agencies (Partner Agencies)

**AB 210 EMPLOYEE CONFIDENTIALITY STATEMENT**  
**RIVERSIDE COUNTY HOMELESS ADULT AND FAMILY MDTs**

**I. Background**

The passage of Assembly Bill 210 created Section 18999.8 of the Welfare and Institutions Code which permits multi-disciplinary personnel teams (MDTs) comprised of employees of Participating Agencies to share and exchange information made confidential by State law in order to facilitate the expedited identification, assessment, and linkage of homeless adults and families to housing and supportive services within the County.

MDT members may disclose and exchange with one another, otherwise confidential information if the team member possessing that information, reasonably believes it is generally relevant to the identification, assessment, and linkage of homeless adults and families to housing and supportive services, provided that no information may be shared in a manner prohibited by federal law or regulations.

Ensuring the confidentiality of information regarding homeless adults and families is of critical importance. All information shared between AB 210 MDT members is private and confidential. WIC 18999.8 requires all persons who have access to confidential information pursuant to the MDT to sign a confidentiality statement.

**II. Use and Confidentiality of Information**

As a Participating Employee, you must: 1) abide by the Riverside County Uniform Policies and Procedures governing the use, disclosure, sharing and maintenance of confidential information; 2) uphold all privacy protection standards established by Riverside County and your department/agency; and 3) comply with all federal and State laws and regulations that protect client records and are not superseded by AB 210.

The following documents set forth the Riverside County requirements for Participating Agencies and their employees governing information sharing and maintenance of the confidentiality of information:

- *Riverside County AB 210 Protocol Governing Information Sharing By Homeless Adult And Family Multidisciplinary Personnel Teams ("Riverside County Protocol")*
- *Riverside County Uniform Policies and Procedures AB 210 Homeless Adult and Family Multidisciplinary Teams ("Riverside County Uniform Policies and Procedures")*
- *Riverside County Board Policy A-58 Enterprise Information Systems Security Policy*
- *Riverside County Board Policy B-23 (Health Privacy Policy) and respective Department specific policies*

- *Riverside County Board Policy A-43, county Records Management and Archives*

Additionally, your employing Participating Agency may promulgate its own policies and procedures governing security, privacy, and information sharing.

### **III. Acknowledgement and Agreement:**

By your signature below, you are certifying that:

- You have received a copy of, reviewed, and will abide by the Riverside County Protocol and Riverside County Uniform Policies and Procedures;
- You agree that you will only share/disclose information that you reasonably believe is generally relevant to the identification, assessment, and linkage of homeless adults and families to housing and supportive services;
- You understand that no confidential information or writings shall be disclosed to persons who are not members of the MDT, except to the extent required or permitted under applicable law;
- You agree that information and/or records you obtain as a MDT member will be maintained in a manner that ensures the maximum protection of privacy and confidentiality rights;
- You have completed the County's AB 210 training; and
- You understand that any violation of this Participation and Confidentiality Statement is grounds for discipline, including but not limited to the immediate suspension or revocation of your current and future authorization to disclose or receive confidential information as a member of any MDT.

Name: \_\_\_\_\_

Department/Agency Name:

\_\_\_\_\_

Job Title: \_\_\_\_\_

Email: \_\_\_\_\_

Telephone: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**PARTICIPATING AGENCY AGREEMENT FOR RIVERSIDE COUNTY HOMELESS  
ADULT AND FAMILY MULTIDISCIPLINARY PERSONNEL TEAMS**

**BACKGROUND:**

Assembly Bill 210 (January 1, 2018) created section 18999.8 of the Welfare and Institutions Code. That new section permits multidisciplinary personnel teams (MDTs) of Participating Agencies to share and exchange information made confidential by State law in order to facilitate the expedited identification, assessment, and linkage of homeless adults and families to housing and supportive services within the County.

**PARTICIPATING AGENCY DEFINITION:**

Riverside County departments, their contracted agency providers, other governmental agency partners, and any other agencies/organizations that have, as one of their purposes, the identification, assessment, and linkage of homeless families and/or individuals to housing and supportive services to homeless adults or families within the County, may become a "Participating Agency."

**PROTOCOL:**

WIC 18999.8 requires that a Countywide protocol be developed as part of implementation of the MDTs. Attached is a copy of the County's Protocol.

**POLICIES AND PROCEDURES:**

WIC 18999.8 requires Participating Agencies to have uniform written policies and procedures that include security and privacy awareness training for employees who have access to information pursuant to WIC 18999.8. Attached is a copy of the Uniform County Policies and Procedures, which apply to all Participating Agencies.

**CONFIDENTIALITY:**

WIC 18999.8 requires all persons that have access to confidential information pursuant to the MDT to sign a confidentiality statement that includes, at minimum, general use, security safeguards, acceptable use, and enforcement policies. Further, every MDT member shall be under the same privacy and confidentiality obligations and subject to the same confidentiality penalties as the person disclosing or providing the information or records. Information and records must be maintained in a manner that ensures the maximum protection of privacy and confidentiality rights. Attached is a copy of the County's Confidentiality Statement.

**SECURITY CONTROLS:**

WIC 18999.8 requires that Participating Agencies have 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. Security controls are required by the County's Protocol and Uniform County Policies and Procedures.



**COMPLETE AND ACCURATE INFORMATION:**

WIC 18999.8 requires that Participating Agencies take reasonable steps to ensure information provided is complete, accurate, and up to date to the extent necessary for the agency's intended purposes and that the information has not been altered or destroyed in an unauthorized manner.

**ACKNOWLEDGEMENT AND AGREEMENT:**

By your signature below, you are certifying:

- Your department or agency will be a Participating Agency;
- Your department or agency has received a copy of and will abide by the County Protocol;
- Your department or agency has received a copy of and will abide by the Uniform County Policies and Procedures; and
- Your department or agency will ensure that all employees participating in information-sharing under a homeless adult and family MDT have signed the required Confidentiality Statement.

Department/Agency Name: \_\_\_\_\_

Name, Title, and Contact Information of Individual Signing on Department/Agency's behalf:

\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Please email the completed document to {DPSScontracts@rivco.orgINSERT}.**