San Mateo County Behavioral Health and Recovery Services BHRS Policy 03-04, Attachment A revised January 2014

Minimum Necessary Access By Workforce Class

Class	Location	Categories of PHI	Computer Access	Purpose
Licensed, Registered or Waivered professional staff	Treatment Sites	Complete Medical Record of assigned clients or of clients assigned to staff team; referred clients; other clients as needed when staff is OD or on-call NOTE: No access to Avatar AOD record	Avatar Soarian Panoramic	• Clinical Care • Consultation
Independent Contractors or Volunteer professional staff	Treatment Sites	See above	Avatar Soarian Panoramic	• Clinical Care • Consulta- tion
Trainees (professional)	Treatment Sites	Complete Medical Record of assigned clients or of clients assigned to staff team NOTE: No access to Avatar AOD record	Avatar Soarian Panoramic	• Clinical Care • Profession -al Devel- opment
Unlicensed Clinical Staff – Mental Health Counselors and Case Managers	Treatment Sites	See above	Avatar Panoramic	Clinical Care
Outcomes Assistants and others with specific limited functions	Treatment Sites	Portions of the medical record (demographics, anniversary dates, etc.) as needed to perform assigned functions; No AOD material	Avatar	Task related functions including filing

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ACCESS - Call Center Clinical Staff	ACCESS – Call Center Team	 Complete medical records of clients referred or opened to team Authorization and referral data 	Avatar Soarian	 Clinical Care Consultation Authorization Referral
 Clinical Specialists; Supervisors Managers Behavioral Health Medical Director 	Treatment Sites BHRS Admin.	 Complete Medical record of all clients assigned to own team or area No Avatar AOD access unless medical emergency 	Avatar Soarian Panoramic	 As needed for staff supervisi on or case-load management Other operation -al purposes
BHRS AOD Staff	Administrative Offices	AOD records created by funded contract agencies	Avatar AOD record	Contract manage- ment
• BHRS Director • BHRS Assistant Director	BHRS Admin.	 Complete Medical Records Complete TPO information 	Avatar Soarian Other systems as necessary	As needed to perform regulated functions
BHRS Deputy Director	BHRS Admin.	 All payment and operations information Portions up to complete clinical record (including AOD in Avatar) as needed to perform defined duties 	Avatar Soarian Ifis Other systems as needed	All TPO information as needed to function as manager of Mental Health Plan and to perform other assigned functions

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Administrative Support Staff including Volunteers and Part-time staff	Clinical Sites	Complete medical record to extent necessary to perform assigned task (i.e., pulling and refiling charts; filing material; financial evaluation; openings/closing; appointment reminders; etc.)	Avatar PBM System (Pharmacy staff only)	To support operations
Quality Management Staff	BHRS Admin.	Complete Medical Records (all MH and AOD) and other TPO data	Avatar (MH and AOD) Soarian Panoramic	Quality Assurance and Improve- ment
Conservator- ship Investigation	Located in Regional Site	Complete Medical Record of clients under investigation including records of previous investigations	Avatar Soarian	Conserva- torship activities
Office of Consumer and Family Affairs	Alameda Site	 Information necessary for management of grievances; (Family Partners) Complete Medical record of assigned client or of clients assigned to staff team 	Avatar	Clinical Care and/or Grievance Investiga- tion
Patient Rights Advocate (contract)	Located in Regional Site	 All information shared by client Requires authorization to read clinical chart Hospital Records when performing site review and reviewing seclusion and restraint data 	Avatar Soarian	Locate information Verify Medi-Cal eligibility Look into complaints

Class	Location	Categories of PHI	Computer Access	Purpose
Research and Evaluation Staff	Alameda Site	 Youth and Adult Outcomes responses Satisfaction and other survey responses Grant-required assessment forms Computerized demographic, costs, services and other data Medical records as indicated in approved Research proposals 	Avatar May create specialized data bases	 Operations Response to Funders Research
Clinical Pharmacists	Located in Regional Clinic	 Demographic, diagnostic and services data Medication data in computer Clinical chart review for study or quality review purposes Complete enrollment data Adverse response data 	Avatar Soarian PBM system	 Management of Pharmacy Benefit Quality Improvement
Billing and Accounting Staff	BHRS Admin	 Demographics Insurance and other billing data Clinical data as necessary to substantiate claims made or received 	Avatar Ifis	To claim for servicesTo pay for services
Representative Payee Fiscal Specialists (Now Aging and Adult Services Staff)	Health Services Offices	 Complete demographic data Treatment locations and costs Disability evaluations Communication with case-managers re current functional status All funding sources 	Avatar Panoramic	To maintain client accounts to assure funds for food, clothing and shelter

Class	Location	Categories of PHI	Computer Access	Purpose
MIS Staff	BHRS Admin	 All demographic, and clinical/functional data Complete medical record for closed cases Data from contracted BHRS providers 	Avatar Soarian	 Input and management of computerized data Management of closed charts Retrieval as needed.
Security Guard	Admin. and/or clinical sites	 Client names Information as needed to assist in potentially dangerous situations 	None	To reduce risks