

**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 Data Exchange and Privacy Protection Governance Committee.

**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 the Data Exchange and Privacy Protection Governance Committee 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 Data Exchange and Privacy Protection Governance Committee.
- 12.2 Any changes to these Policies and Procedures will be approved by Data Exchange and Privacy Protection Governance Committee. All Participating Agencies will receive a copy of revised Policies and Procedures upon such approval.