O. Contracting

Note: References to contracting do not apply to County-operated programs.

All contracted providers, including subcontractors, shall adhere to the Behavioral Health Plan (BHP) contract executed between San Diego County and the California State Department of Health Care Services (DHCS). All non-County-operated organizational providers must contract with the County of San Diego to receive reimbursement for Specialty Mental Health Services.

Please read the contract carefully, it contains:

- General terms applicable to all contracts
- Special terms specific to a particular contract
- A description of work or services to be performed
- Payment Schedule and/or budget; and
- Statutes and/or regulations particular to the Medi-Cal managed mental health care programs as well as programs supported by other funds

Selection and monitoring of organizational agencies are governed by contracting procedures, which require a review of the organization's fiscal soundness, resumes of principal administrators and supervisors, the agency's experience with similar services, and a proposed staffing plan. All contracted providers will be expected to adhere to these requirements. Contractor shall have the technological capability to communicate, interface and comply with all County requirements electronically using compatible systems, hardware and software.

Please contact the Behavioral Health Services Contracting Officer's Representative (COR) with any questions regarding the contract.

Provider Orientation

All new agreements require a provider orientation meeting within thirty (30) business days of the agreement's execution or start date, whichever occurs later, and as needed throughout the agreement term. Additional orientations may be required when there are changes to key provider or County staff, operational or fiscal processes, laws or regulations, funding requirements, agreement templates, or unique agreement elements. The CORs and Administrative Representatives, in conjunction with the BHS Contract Support Team, are responsible for leading the provider orientation.

The orientation ensures providers understand their contractual obligations and the County's monitoring activities, and may be conducted in person, virtually, by email, telephone, or any combination, as deemed appropriate by the COR or Administrative Representative.

The provider will designate a contact person to coordinate attendance of necessary provider staff at the orientation. For experienced providers, orientation may be limited to updates on unique agreement requirements or changes to County/BHS processes.

Disclosure Requirements

The Behavioral Health Plan (BHP) providers and contractors shall disclose to the state any persons or corporations with an ownership or control interest that:

- Has direct, indirect, or combined direct/indirect ownership interest of five percent (5%) or more of the Legal Entity's equity;
- Owns five percent (5%) or more of any mortgage, deed of trust, note, or other obligation secured by the Legal Entity if that interest equals at least five percent (5%) of the value of the BHP's assets;
- Is an officer or director of a Legal Entity organized as a corporation; or
- Is a partner in a Legal Entity organized as a partnership.
- Any person with a five percent (5%) or more direct or indirect ownership of the Legal Entity's equity must submit to a criminal background check, including submitting fingerprints. (42 CFR 455.434(b)

The contract requires the BHP to submit:

- The name and address of any person (individual or corporation) with an ownership or control interest in the managed care entity and its subcontractors.
- The addresses for corporate entities must include as applicable primary business address, every business location, and P.O. Box address.
- The date of birth and Social Security Number (SSN) of any individual with an ownership or control interest in the BHP and its subcontractors.
- Other tax identification number of any corporation with an ownership or control interest in the BHP and any subcontractor in which the BHP has a five percent (5%) or more interest.
- Information on whether an individual or corporation with an ownership or control interest in the BHP is related to another person with ownership or control interest in the BHP as a spouse, parent, child, or sibling.

- Information on whether a person or corporation with an ownership or control interest in any subcontractor in which the BHP has a five percent (5%) or more interest is related to another person with ownership or control interest in the BHP as a spouse, parent, child, or sibling.

- The name of any other disclosing entity in which an owner of the BHP has an ownership or control interest.

- The name, address, date of birth, and SSN of any managing employee of the BHP.

Disclosure to the State shall be made during the following:

- When the Legal Entity submits a proposal in accordance with the County's procurement process or when the contractor submits a provider application.

- When the Legal Entity executes a contract with the County or when the provider executes a provider agreement with the state.

- When the County renews or extends the Legal Entity contract.

- Within thirty- five (35) days after any change in ownership of the Legal Entity or contractor/disclosing entity.

- Upon request of the state during the revalidation of the provider enrollment.

- Within thirty-five (35) days after any change in ownership of the disclosing entity.

- See 1124(a)(2)(A) of the Act; section 1903(m)(2)(A)(viii) of the Act; 42 CFR 438.608(c)(2); 42 CFR 455.100 - 104]

Conflict of Interest

Contractor shall not utilize any State officer or employee in the State civil service or other appointed State official for performance of the contract unless specific criteria is met, as per Pub. Con. Code § 10410; 42 C.F.R. § 438.3(f)(2). Contractor shall inform their COR of current and former State employees who are working under a program that is funded by County BHS.

Contractor Compliance Attestation

Contractors shall complete the compliance attestation form attesting to

compliance with all applicable Federal, State, County, and local laws, rules, and regulations and County contract requirements, including those from the County of San Diego Services Agreement and the Organizational Provider Operations Handbook, including but not limited to, the requirements below:

- Prohibition of Political Activities
- Byrd Anti-Lobbying Amendment
- Disclosure Requirements re: five percent (5%) or Greater Ownership and Controlling Interest)
- Conflict of Interest re: current or former State employees working under a program funded by County BHS
- Comprehensive Continuous Integrated System of Care
- Cultural and Linguistically Appropriate Services Standards
- Access to Services for Persons with Disabilities
- National Voter Registration Act
- False Claims Act training and reporting
- Privacy Breach and Suspected Security Incident
- Criminal Background Check & Subsequent Arrest Notification (Both Contractor & Subcontractor staff)

Corrective Action Notice

Corrective Action Notice (CAN) is a tool identifying deficiencies in compliance with contractual obligations and requires corrective actions within a specified time frame. A CAN may result from site visits or information derived from reports. Contractors are required to respond to the CAN specifying course of actions initiated/implemented to comply within the specified time frame.
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Transportation of Members

Contractors shall not use taxi cabs to transport unescorted minors who receive services funded by the County of San Diego. BHS does not limit providers from claiming for services/interventions provided concurrently while transporting members,

however providers should utilize their best clinical judgment in determining if it is safe and appropriate and the intervention is therapeutic/benefits the member; with consideration to safety of member/provider, ability to focus attention on driving.

Verifications

License Verifications

All HHSA contractors are required to verify the license status of all employees who are required by the contract Statement of Work to have and maintain professional licenses. The verification must be submitted at the time of contract execution, renewal or extension. In order to ensure the license is valid and current, the appropriate website(s) shall be checked. For county operated programs, license verification is completed by the Human Resource department. All providers are responsible for ensuring that all staff licenses are active and valid. Providers shall keep documentation that evidences active licensure for staff.

National Provider Identification Verification

All contractors are required to verify that all clinical staff, licensed or not, have an active National Provider Identification (NPI) number. Contracted programs are to provide new employees with necessary paperwork needed to apply for an NPI number, should they not already have one. If the new employee has an NPI number, the contractor shall verify in the National Plan and Provider Enumeration System (NPPES) for accuracy. Contractors must update the NPPES system as needed when the employee's information changes. The BHP is required to complete the same verification process for the contracted providers. When contractors submit their Access Request Form (ARF) for staff account set up in the electronic health record, the BHP MIS unit preforms validation through the NPPES database. Staff shall not have access to the electronic health record without a valid NPI number.

Disbarment or Exclusion Federal and State Database Checks

During the provider enrollment/reenrollment process, it is required that the BHP checks the following databases to verify the identity and determine the exclusion status of all providers:

- Social Security Administration's Death Master File
- National Plan and Provider Enumeration System (NPPES)
- List of Excluded Individuals/Entities (LEIE)
- System for Award Management (SAM)
- CMS' Medicare Exclusion Database (MED).
- DHCS' Suspended and Ineligible Provider List

- Restricted Provider Database (RPD)

Providers may be included on these lists for any of the following reasons:

- Been convicted of a felony;
- Been convicted of a misdemeanor involving fraud, abuse of the Medi-Cal program or any member, or otherwise substantially related to the qualifications, functions, or duties of a provider of service;
- Been suspended from the federal Medicare or Medicaid programs for any reasons;
- Lost or surrendered a license, certificate, or approval to provide health care; or
- Breached a contractual agreement with the Department that explicitly specifies inclusion on this list as a consequence of the breach, verification can be access by clicking on the link.

In addition to checking all the databases upon a provider's enrollment/reenrollment, the BHP will review the SAM, LEIE, and RPD databases on a monthly basis. All databases will be reviewed upon a provider's enrollment/reenrollment to ensure that the provider continues to meet enrollment criteria. An BHP network provider must maintain good standing in the Medicare and Medicaid/Medi-Cal programs. Any provider terminated from the Medicare or Medicaid/Medi-Cal program may not participate as a provider within the BHP's network. Providers will report immediately to their COR any individual or entity that appears on any government excluded list and take the appropriate corrective action.

Provider Credentialing via Optum

San Diego County Behavioral Health Plan (SDCBHP) program for credentialing, re-credentialing and provider enrollment is designed to comply with national accrediting organization standards as well as local, state and federal laws. The process described below applies to all Legal Entities which opted to complete credentialing, recredentialing and provider enrollment using Optum's centralized process. Legal Entities are responsible for ensuring the successful completion of credentialing activities for all new staff upon hire.

Per DHCS BHIN 18-019, credentialing/recredentialing requirements are applicable to Medi-Cal Programs and require Licensed, Registered, Certified or Waivered providers that provide direct billable services to be credentialed and re-credentialed every three (3) years. Billing providers are subject to the rules, processing requirements, and enrollment timeframes defined in Welfare and Institutions Code

Section 14043.26, including the timeframe within Section 14043.26(f) that generally allows DHCS up to one hundred and eighty (180) days to act on an enrollment application.

Consistent with DHCS Information Notice 20-071, Optum will enroll all applicable network providers, including individual rendering providers, through the DHCS Provider Application and Validation for Enrollment (PAVE) portal.

For Applicable Providers, Optum's Enrollment Coordinator will begin an Ordering Referring Prescribing (ORP) Application or an Affiliation Application as applicable in PAVE within five (5) business days from the date the provider returned an application for credentialing complete to Optum. Providers will receive an email from PAVE asking them to log in and respond to the disclosure questions and sign their application. Providers shall respond to the notification email from PAVE and complete their application within five (5) business days.

Initial Credentialing

Initial credentialing processes begin with submission of completed and signed applications, along with all required supporting documentation. Providers are to call Optum's Behavioral Health Services Credentialing Department at (800) 482-7114 or send a notification email to BHSCredentialing@optum.com. Entities can also choose to work with their assigned Optum Credentialing Representative directly by sending timely notice of changes in provider status such as but not limited to terminations, changes in license/registration, new hire notifications, etc.

The credentialing process includes without limitation attestation as to: (a) any limits on the provider's ability to perform essential functions of their position or operational status; (b) with respect to individual practitioner providers, the absence of any current illegal substance or drug use; (c) any loss of required state licensure and/or certification; (d) with respect to individual practitioner providers, any loss or limitation of privileges or disciplinary action; and (f) the correctness and completeness of the application.

Optum will also be conducting primary source verification of the following information:

- Current and valid license to practice as an independent practitioner at the highest level certified or approved by the state for the provider's specialty or facility/program status.

- Professional License current and valid and not encumbered by restrictions, including but not limited to probation, suspension and/or supervision and monitoring requirements.

- Clinical privileges in good standing at the institution designated as the primary admitting facility if applicable, with no limitations placed on the practitioner's ability to independently practice in his/her specialty.

- Graduation from an accredited professional school and/or highest training program applicable to the academic degree, discipline or licensure.

- Board Certification, if indicated on the application.

- A copy of a current Drug Enforcement Administration (DEA) or Controlled Dangerous Substance (CDS) Certificate, as applicable.

- No adverse professional liability claims which result in settlements or judgments paid by or on behalf of the practitioner, which disclose an instance/ pattern of behavior which may endanger members.

- No exclusion or sanctions/debarment from government programs.

- The current specialized training required for practitioners.

- No Medicare and/or Medicaid sanctions.

SDCBHP also requires:

- Current, adequate malpractice insurance coverage.

- Work history (past five (5) years) for the provider's specialty.

- No adverse record of failure to follow SDCBHP policies, procedures, or Quality Management activities.

- No adverse record of provider actions which violate the terms of the provider agreement.

- No adverse record of indictment, arrest or conviction of any felony or any crime indicating member endangerment.

- No criminal charges are filed relating to the provider's ability to render services to members.

- No action or inaction taken by provider that, SDCBHP's sole discretion, results in a threat to the health or well-being of a member or is not in the member's best interest,

Residential Programs (facilities) must be evaluated at credentialing and re-credentialing. Those who are accredited by an accrediting body accepted by Optum (currently JCAHO, CARF, COA and Adult/ Older Adult) must have their accreditation status verified. On-accredited Residential Facilities/Sites providers must provide documentation from the most recent audit performed by DHCS, DHS or CMS as applicable.

Re-credentialing via Optum

SDCBHP requires that individual practitioners and Residential Programs Sites undergo re-credentialing every three (3) years. Re-credentialing will begin approximately six (6) months prior to the expiration of the credentialing cycle.

Required documentation includes without limitation attestation as to:

- any limits on the participating provider's ability to perform essential functions of their position or operational status
- the absence of any current illegal substance or drug use with respect to individual practitioners participating providers;
- the correctness and completeness of the application (including without limitation; and
- identification of any changes in or updates to information submitted during initial credentialing).

Failure of a participating provider to submit a complete and signed re-credentialing application, and all required supporting documentation timely and as provided for in the re-credentialing application and/or requests from Optum, may result in termination of participation status with SDCBHP and such providers may be required to go through the initial credentialing process.

Credentialing information that is subject to change must be re-verified from primary sources during the re-credentialing process. The practitioner must attest to any limits on his/her ability to perform essential functions of the position and attest to absence of current illegal drug use.

Equipment, Consumable Supplies and Inventory Guidelines for County Contracts

All Capital Assets/Equipment, Minor Equipment, and Consumable Supplies purchases shall be included in Cost Reimbursement contract budgets and shall be

approved by the Contracting Officer's Representative (COR) upon budget submission. The equipment and supplies shall directly benefit members and program's objectives.

County retains title to all non-expendable property provided to Contractor by County, or which Contractor may acquire with contract Agreement funds if payment is on a cost reimbursement basis, including property acquired by lease purchase Agreement. Internal Controls and Procedures below provide guidelines on handling Capital Assets and Minor Equipment.

Definitions

- Capital Assets/Equipment: Tangible non-expendable property that has been purchased with County funds and has a normal life expectancy of more than one year and a unit cost of $10,000 or more. Prior written approval from the COR is required for the acquisition of Capital Assets/Equipment. Examples of Capital Assets/Equipment include, but are not limited to: building improvements, vehicles, machinery, furnaces, air conditioners, multifunction copy machines, furnishings, etc.

- Minor Equipment: Any non-consumable implement, tool, or device that has a useful life of more than one year and an acquisition amount of $500 to $9,999. Examples of Minor Equipment include, but are not limited to televisions, video recorders and players, computer monitors, therapy equipment, refrigerators, hand-held electronic devices, electronic games, modular furniture, desks, chairs, conference tables, etc.

- Consumable Supplies: Goods that have a useful life of one year or less and an acquisition value under $500. Examples of consumable supplies include, but are not limited to: pens, pencils, paper, notepads, file folders, Post-it notes, toner or ink cartridges, waiting room supplies, etc.

Internal Controls and Procedures

(Applicable to items acquired prior to 7/1/23 only)

Contractors shall have the following internal controls and procedures in place for managing contract-funded Capital Assets/Equipment and Minor Equipment, whether acquired in whole or in part with County funds**,** for items acquired prior to 7/1/23**,** until disposition takes place:

- Prior written approval from the COR is required for the acquisition of Capital Assets/Equipment through budget development requests or Administrative Adjustment Requests.

- Contractors shall place County of San Diego Property tags on Capital Assets/Equipment and Minor Equipment to identify items purchased with County funds. These tags can be requested through the COR.

- Contractors shall include the expenditure of Capital Assets/Equipment and Minor Equipment on the monthly invoice/cost report that immediately follows the acquisition.

- Contractors shall maintain inventory records that include a description of the item, a serial number or other identification number (if applicable), the acquisition date, the acquisition cost, location of the item, condition of the item, program funding for the item, and any ultimate disposition data including the date of disposal.

- Contractors shall submit an *Inventory Report of Capital Assets/Equipment and Minor Equipment* purchased using County funds annually to the COR no later than thirty (30) calendar days into each new contract year, and when any updates occur throughout the year (e.g., new items charged to the contract or when items are stolen, lost, damaged, missing, and upon disposal completion. The COR will review the Inventory Report to determine if the information is reasonable and complete based on their knowledge of the contract and approval of invoices containing charges for equipment.

- The Inventory Report is to include all Capital Assets/Equipment and Minor Equipment items purchased since inception of the cost reimbursement contract, including all vehicles purchased and/or leased.

- Inventory records on non-expendable equipment shall be retained and shall be made available to the County upon request, for at least 10 years following date of disposition

- Contractors may choose to utilize their own Inventory Report as long as the required information above is included. Otherwise, contractors can utilize the BHS Inventory Form.

- Contractors shall include in the Inventory Report any items that were transferred from one County program to another and note the transfer date and program. A DPC 204 form shall be completed.

- Contractors shall make all purchased items available to the COR (or their designee) for inspection at any time.

- Contractors shall be responsible for accounting of all county-funded items, whether acquired in whole or in part with

- County funds. Contractors that are required to work with computers, laptops, portable devices or media that contain personal information relating to members shall have a duty to protect this data from loss, theft or misuse (refer to Article 14 Information Privacy and Security Provisions in the contract). All electronic property and information technology (IT) related items capable of storing information, regardless of acquisition price and useful life, must be included in the Inventory Report. Examples of electronic property and IT related items capable of storing information include, but are not limited to: cellphones, laptops, tablets, USB memory devices, cameras, etc.

- Contractors do not need to include in the Inventory Report consumable supplies valued under $500 except for electronic property and IT related items specified in item #k above such as cell phones, laptops, anything that hold PII, and items subject to misuse or theft.

Stolen, Damaged or Missing Equipment

Contractor shall inform the COR in writing within 48 hours of any stolen, damaged or missing equipment purchased with County funds. Exception: Any lost or missing item that contains personal information shall be reported in writing to the COR within 24 hours. Article 14 Information Privacy and Security Provisions requirements shall be followed when appropriate. Contractor may be responsible for reimbursing the County for any stolen, damaged or missing equipment at the current book value of the asset.

Vehicles

The preferred method for Contractor(s) to acquire vehicles is through a lease arrangement. COR and County Management preapproval must be obtained for Contractor to acquire a vehicle. Vehicles shall be registered with the Contractor as the lien holder and registered owner. Whether vehicles are leased or purchased, Contractor shall maintain appropriate insurance on vehicles, follow maintenance schedule, as required by the automobile manufacturer. Vehicle(s) usage and insurance requirement language will be included/amended in the contract. If vehicle will be purchased, COR must obtain written pre-approval from ACS Director, and DPC Director. At contract termination, or when the original or replacement equipment/vehicle is no longer needed, or has become obsolete, or is inoperable and impractical to repair, a formal disposition process will be required (refer to BHS Property Transfer/Disposal Process). Contractors shall work with the COR, who will determine the final disposition of the item(s).

Inventory Disposition

Contractors should not remove or dispose the items previously listed on their Inventory Report submitted to the County, unless the COR approved the salvage or

transfer of those items, or a County Behavioral Health Services policy provided such instructions. Minor Equipment not meeting the requirement to be listed on the Inventory Report and Consumable Supplies do not need to be disposed through the County process. Non-expendable property that has value at the end of a contract (e.g., has not been depreciated so that its value is zero), and which the County may retain title, shall be disposed of at the end of the contract Agreement as follows.

At County's option, it may:

1. Have Contractor deliver to another County contractor or have another County contractor pick up the non-expendable property;

2. Allow the Contractor to retain the non-expendable property provided that the Contractor submits to the County a written statement in the format directed by the County of how the non-expendable property will be used for the public good; or

3. Direct the Contractor to return to the County the non-expendable property.

BHS Property Inventory Form: Available for download from the Optum website > BHS Provider Resources > SMH & DMC-ODS Health Plans > *Forms* tab. As the contractor disposes of equipment the following column on the BHS Inventory form must be completed and a copy provided to the COR. "*Approved Date of Item Transfer or Disposition*." This is the date of the COR approval.

Procedure for Property Transfer to the County of San Diego – Property Disposal or Transfer to another contractor: For purposes of this section on disposal of minor equipment, "contractor" refers to the specific numbered County contract, and that contract's County-owned property, not to the combined County-owned assets of multiple County contracts held by a parent organization/organizational provider.

Versions of the forms, DPC 203, IT Supplemental and DPC 204 can be:

1. Provided to the contractor by BHS staff;
2. Downloaded from the link in the Technical Resource Library (TRL);
3. Downloaded from the Technical Resource Library (TRL) under section 1.2.4 (General Forms and Instructions).

BHS Contract Support administrators will keep an internal record of any County-owned property and conduct an inventory of all County-owned property during selected site visits. There are three distinct transfer/disposition procedures in place for minor equipment. These are for disposal of Non-IT items that do not have memory, IT items containing memory, and IT Mobile Devices.

All minor equipment salvage requests are to be completed by the contractor on the

appropriate version of the DPC form and forwarded to their Contracting Officer's Representative (COR) who will review, approve, sign and forward the DPC form to the appropriate County staff

Once processed and approved by BHS and/or the Department of Purchasing and Contracting (DPC), the COR will notify the contractor of further steps. All DPC forms must include:

- Program name,
- Contract number,
- COR name,
- Address (with Zip Code) identifying the physical location of the items, and
- full site contact information including name, phone number and email.

Directions for transfers between contracts are included below for each procedure:

- A fillable version of the DPC form is now available for use for Non-IT, IT and Mobile Device disposal. Contractors are not to make changes to the DPC forms, including changing pre-filled wording or making any entries in the forms' boxes #7 through #16. Non-IT equipment, IT equipment and Mobile Devices cannot be listed on the same DPC 203 form

- DPC 203 forms used for minor equipment disposal are located on the Optum Website > BHS Provider Resources > SMH & DMC-ODS Health Plans > Forms tab.

Non-IT Disposal Requests (furniture, office equipment without memory, printers, most copiers, non-memory-containing computer accessories [computer monitors, keyboards, mice], routers, docking stations, wireless access points, DVD players, etc.):

- Requests are to be completed on the *DPC 203* Fillable form, checking the "Non-IT" box, and sent to the COR for review, approval, electronic signature and forwarding.

    - Non-IT requests require the condition of the items to be noted and must be accompanied by photos in .jpg format, (file size must be smaller than 5 MB for posting purposes) preferably with like items grouped but individually identifiable in the photos.

    - The purpose of the condition statement and photos is to give other County departments information useful in deciding if they want to acquire items - photos should provide a clear image of the item(s) and condition should be appropriate for the kind of item – any damage and age issues for

furniture, working and functionality issues for equipment, and any contamination issues for all items.

- Once DPC's approval is final, the COR will provide the program with the approved DPC 203 form (with a Control No.) and directions for delivery by the program, per pre-scheduled appointment, accompanied by the approved DPC 203 form, to the County's disposal contractor.

- Contractors are to retain the disposal contractor's signed proof of delivery and then forward that documentation to the COR team.

Transfers of Non-IT items between contracts/programs require the sending program/COR team to complete the *DPC 204* Fillable form, entering both the sending and receiving programs' names, contract numbers, COR names, current and future addresses of property, the site contact names, phone numbers and email addresses, and forward to the sending COR. The sending COR reviews, approves, electronically signs the form, and secures the receiving COR's approval and electronic signature (if different). The COR then forwards the approved form to BHS staff for further processing. Transfers of Non-IT items do not require photos or condition.]

IT Disposal Requests (those items with memory: computers, laptops, notebooks, servers, zip drives, higher-end copiers with memory, etc.)

- Requests are to be completed on the DPC 203 Fillable form, checking the IT box, and then sent to the COR for review, approval, electronic signature and forwarding. The DPC 203 Fillable form includes a section for Wipe Certification for use with IT disposals. (HHSA only recognizes Department of Defense (DoD) level wiping done by its approved IT Wipe Vendor). IT items must be physically located at the address provided on the DPC 203 and retained at that site for pick up.

- Use DPC 203 form as a cover sheet: no itemizing on the form.

- On the DPC 203, the "Sender Information, Equipment Location and Contract Information" section is to be completed with full contract and contact information.

- The DPC IT SUPPLEMENTAL form is to be completed, listing individual items by Description (brand and model), Serial Numbers (NOT model numbers), "N/A" under Password to Unlock (passwords must be removed on all IT devices), and indicating "N" (for No) in the "Grant Funded" column.

- Group pictures are required for IT items, they do not to be individual.

- Following receipt of the disposal form with COR approval, the contractor will be contacted by CoSD HHSA IT's Wipe Vendor, to arrange for pick up for disposal.

(Include the power cords for all types of computers at point of pick-up. Note the physical location of the serial numbers on each unit, as the Wipe Vendor must verify serial numbers as a condition for pick up).

- The contractor must ensure that the IT Wipe Vendor completes the first box of the Wipe Certification of the DPC 203 form at point of pick-up.

- Once the equipment is picked up, the contractor will send a copy of the form with the completed wipe pick-up confirmation to the COR.

- Transfers of IT items between contracts/programs following DoD wiping, require the sending program to complete the DPC 204 Fillable, entering both the sending and receiving programs' names, contract numbers, COR names, current and future addresses of property, the site contact names, phone numbers and email addresses, and forward to the sending COR.

- The sending COR reviews, approves, signs the form and secures the receiving COR's approval and signature (if different), and forwards the DPC 204 form to BHS staff.

- BHS staff then arrange for HHSA IT's Wipe Vendor to pick up the items, do the DoD wipe, and return the wiped items to the contractor at the pick-up location.

- The contractor secures the DoD Wipe Vendor's signature on the DPC 204 at point of pick up (first box of Wipe Certification) and again when wiped items are returned (second box of Wipe Certification).

- Following DoD wiping, the sending program sends the COR the DPC 204 with both sections of the Wipe Certification completed. The sending and receiving programs then coordinate transfer of wiped equipment. Contractors should discuss situations with their CORs when the wiping requirement may potentially be waived, for example certain same provider re-procured (rollover) contracts, or when a new provider will be serving the identical client base and providing identical services. In these situations, a wipe waiver from the HHSA Compliance Office is required.

Mobile Devices Disposal Requests (cell phones, flip phones, smart phones, hotspots, Wi-Fi cards, tablets, etc.)

- Requests are to be completed using, the DPC 203 IT and the DPC IT SUPPLEMENTAL, and sent to the COR team for review, approval and forwarding.

- Use DPC 203 form as a cover sheet: no itemizing on the form.

- On the DPC 203, the "Sender Information, Equipment Location and Contract Information" section is to be completed with full contract and contact information.

- The DPC IT SUPPLEMENTAL form is to be completed, listing individual items by brand model and type, providing serial numbers (NOT model numbers) and "N/A" under passwords (passwords must be removed on IT devices), and indicating "N" (for No) in the "GRANT FUNDED" column. This salvage process requires a group photo, in .jpg format, of the listed Mobile Devices.

- This results in a disposal approval email which must be forwarded by the COR to the contractor along with the approved DPC 203 and IT Supplemental forms. The email includes a FedEx prepaid shipping label that must be printed only by the contractor, attaches it to the package of devices, encloses a copy of the approved Mobile Devices DPC 203 and IT Supplemental (approval with the Control No.) in the package, writes the Control No. on the outside of the package, and takes the package to the FedEx outlet for shipping to the County's Mobile Devices Salvaging Vendor.

[The contractor packages the devices for secure, cushioned shipping, encloses a copy of the approved Mobile Devices DPC 203 and IT Supplemental form with the Control No. in the package(s) and writes the Control No. on the outside of the package(s).]

NOTE: DPC requires that all Mobile Devices be reset to their factory default setting prior to shipping.

[Transfers of Mobile Devices are limited to situations where: either the provider, program and services remain the same and only the contract number changes; or where a new provider will be assuming identical services for an identical client population. For Mobile Device transfers where a provider has changed, a wipe waiver must be secured by the COR from the HHSA Compliance Office before the devices can be made available to the new provider.

Electronic Property/IT

Contractors Inventory Minimum Guidelines on A Cost Reimbursement and Fixed PRICE Contract

Inventory responsibility includes these minimum guidelines for the security of member information and portable electronic and data storage devices. This responsibility exists whether the information is in paper or electronic form. Additionally, all Contractor employees have the duty to protect any County assets assigned to them or in their possession, including desktop computers, portable devices and portable media.

Definitions:

Member Data: Any identifying information relating to any individual receiving services from any program.

Portable Devices: Tools such as laptops, external hard drive, PDAs, cell phones, Tablet PCs, other USB memory devices and cameras (digital, non-digital, and video).

Portable Media: Any tool used to transport information any distance such as CDs, DVDs, USB memory sticks, flash drives or smart cards.

Minimum Guidelines

- All Contractors' executives shall be responsible for maintaining a current inventory of all portable devices and portable media in their program.
- All Contractors' electronic devices shall be password protected.
- All member data transported on any portable device or media shall be encrypted and/or password protected.
- Portable devices or portable media shall not be used for routine storage of member data.
- For any privacy incident (e.g., lost or stolen laptop, member files/records accessed, etc.) refer to Serious Incident Reporting to Quality Assurance Unit procedures.