

## Appendix C: Alameda County Policy Matrix

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
 AGENCY  
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### Sharing Protected Health Information for Treatment Purposes

When allowed by law (see below), Protected Health Information (PHI) may be shared for treatment purposes across disciplines and programs on a “need-to-know” basis and for the purposes of improving health outcomes. PHI includes case management/coordination communication, medication prescription and monitoring, counseling session start and stop times, the modalities and frequencies of treatment, results of clinical tests, and any summary of the following items: diagnosis, functional status, treatment plan, symptoms, prognosis, and progress to date. Individual practitioners and program staff in agencies that furnish health services in the normal course of their business are considered treatment or healthcare providers.

HIPAA defines treatment as "the provision, coordination, or management of health care and related services by one or more health care providers, including the coordination or management of health care by a health care provider with a third party; consultation between health care providers relating to a patient; or the referral of a patient for health care from one health care provider to another."

References: Civil Code 56.10(c)(1), H&S Code 123010, and HIPAA (45 CFR sec.164.506, 45 CFR 164.501 45, CFR 164.506).

Description of PHI	Who may disclose it?	Who may receive it?
<b>General Health</b> (includes knowledge of Mental Health, Substance Use/Abuse, HIV/AIDS, STD conditions)	General Health Provider	Patient's providers and providers' staff for the purpose of treatment, diagnosis, or referral  <i>[Reference: Civil Code 56.10(a); HIPAA Treatment Exception]</i>
<b>Mental Health</b> (includes knowledge of General Health, Substance Use/Abuse, HIV/AIDS, STD conditions)	Mental Health Provider	Any healthcare provider (any discipline) "who has medical or psychological responsibility for the patient"  <i>[Reference: W&amp;I Code 5328(a); HIPAA Treatment Exception]</i>
<b>Drug/Alcohol Treatment Program</b> (includes knowledge of General Health, Mental Health, HIV/AIDS, STD Conditions)	Drug/Alcohol Treatment Program Provider	<u>Only</u> another member of the client's treatment team WITHIN the specific drug/alcohol treatment program  Exception: a medical emergency  <i>[Reference: 42 CFR Part 2, section 2.12 (c)(3)]</i>

*Adapted from San Francisco Department of Public Health Privacy Policy Matrix by permission.*