



## SUMMARY REPORT

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**Agenda Date:** 12/17/2019

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**To:** County of Sonoma Board of Supervisors  
**Department or Agency Name(s):** Department of Health Services  
**Staff Name and Phone Number:** Barbie Robinson, 565-7876  
**Vote Requirement:** Majority  
**Supervisory District(s):** Countywide

**Title:**

Health Services Records Manager Position Request

**Recommended Action:**

Adopt a personnel resolution amending the department allocation list for the Department of Health Services adding 1.0 full-time equivalent Department Program Manager to manage the Department's records management program and deleting 1.0 full-time equivalent Accountant II, effective December 17, 2019.

**Executive Summary:**

In November 2018 the Department of Health Services contracted with Primeau Consulting Group to conduct an audit of the Department's records management programs and make recommendations for improvement. As a result of this audit, the Department identified the need for an additional staff allocation to implement and oversee a centralized health information management program. During the fiscal year 2019-2020 budget process the Department requested and the Board approved funding for a health services records manager with the classification to be determined by County Human Resources. In August 2019 County Human Resources analyzed the position requirements and determined the appropriate classification to be Department Program Manager. The Privacy and Security Officer will oversee and participate in the development, implementation, and maintenance of a comprehensive and coordinated records management program across the Department.

During the fiscal year 2019-2020 budget development process, a vacant Department Analyst position was earmarked to perform records management functions and was included in the budget. Subsequently, County Human Resources determined the Department Program Manager job classification to be more appropriate for this function. After further review of resources needed within the Department's Administration Division, it was determined that a Department Analyst position would be more appropriate to perform certain functions within the Fiscal Unit, and that a currently funded and vacant Accountant II position could be eliminated. This item seeks approval of a personnel resolution adding 1.0 full-time equivalent Department Program Manager allocation and deleting 1.0 full-time equivalent Accountant II allocation.

**Discussion:**

Federal and state laws including the Health Insurance Portability and Accountability Act and the California Medical Information Act require the County to maintain the privacy, security, and integrity of client protected health information. In addition, contracts with the state require the County to protect, maintain, and ensure availability of client health information. The County's current organizational structure for managing health

information is a decentralized structure where most programs independently manage the creation, maintenance, and disclosure of information consistent with program and Department policy. Destruction of records is consistent with Board-approved guidelines.

In November 2018 the Department of Health Services contracted with Primeau Consulting Group, a recognized expert in health information management to conduct an audit of the Department's records program processes and organization. The contractor's scope of work was to evaluate current processes against best practices, evaluate current policies and procedures, assess the efficiency and organizational structure of the program, and make recommendations for improvement. As a result of the audit, Primeau Consulting recommended that the Department implement a centralized health information management program overseen by a professional health information manager.

In September 2019 the County conducted a required Health Insurance Portability and Accountability Act Security Risk Assessment. This independent audit of privacy and security practices was conducted by Security Risk Associates, a firm specializing in the assessment of risks to the security, integrity, and availability of health information. In its confidential draft report, Security Risk Associates recommended the development of a more effective records management strategy as a risk mitigation.

Currently, the Department of Health Services has only one Medical Record Clerk dedicated to managing records in the Mental Health Section of the Behavioral Health Division. There are no medical records specialists in the Public Health Division or in the Substance Use Disorder Services Section of the Behavioral Health Division. The current model does not allow for adequate controls and safeguards to ensure compliance with state and federal law. The consequences of fines, sanctions, and penalties for non-compliance by both the federal government and the state Department of Health Care Services can be costly, and the possibility of information breach or mishandling of data creates potential liability as well as potential lack of client trust.

During the fiscal year 2019-2020 budget process the Board approved funding for a health services records manager with classification to be determined by County Human Resources. In August 2019 County Human Resources analyzed the position requirements and determined the appropriate classification to be Department Program Manager. The working title of the position will be Health Services Records Manager and possession of certification as a Registered Health Information Administrator, or a Registered Health Information Technician, is highly desired for the ideal candidate hired for this position.

Staff filling this new position will oversee and participate in the development, implementation, and maintenance of a comprehensive and coordinated records management program across the Department. The incumbent will act as a consultant and resource for the Department regarding record maintenance; and assist in developing policies and procedures to organize, manage, and protect client information in paper and electronic form. Along with the Healthcare Privacy and Security Officer, this position will serve as a resource to Department management and staff regarding health information management laws, regulations, and standards. Additionally, the position will also assist in serving as custodian for all Department of Health Services records.

The Health Services Records Manager (Department Program Manager) will report to the Healthcare Privacy and Security Officer and will be responsible for supervising a Medical Record Clerk.

During the fiscal year 2019-2020 budget development process, a vacant Department Analyst allocation was earmarked to perform records management functions and was included in the budget. Subsequently, County Human Resources determined the Department Program Manager job classification to be more appropriate for this function. After further review of resources needed within the Department's Administration Division, it was

determined that a Department Analyst position would be more appropriate to perform certain functions within the Fiscal Unit, and that a currently funded and vacant Accountant II position could be eliminated. This item seeks approval of a personnel resolution adding 1.0 full-time equivalent Department Program Manager allocation and deleting 1.0 full-time equivalent Accountant II allocation.

Strategic Plan Alignment - The addition of a Health Services Records Manager (Department Program Manager) will support a safe, healthy, and caring community for the residents of Sonoma County by ensuring the appropriate maintenance, disclosure, security and integrity of Sonoma County healthcare information. This ensures that client information remains accurate, available, and confidential, promoting client trust in our services.

**Prior Board Actions:**

None

**FISCAL SUMMARY**

<b>Expenditures</b>	<b>FY 19-20 Adopted</b>	<b>FY 20-21 Projected</b>	<b>FY 21-22 Projected</b>
Budgeted Expenses	72,409	179,706	188,691
Additional Appropriation Requested			
<b>Total Expenditures</b>	<b>72,409</b>	<b>179,706</b>	<b>188,691</b>
<b>Funding Sources</b>			
General Fund/WA GF			
State/Federal			
Fees/Other	72,409	179,706	188,691
Use of Fund Balance			
Contingencies			
<b>Total Sources</b>	<b>72,409</b>	<b>179,706</b>	<b>188,691</b>

**Narrative Explanation of Fiscal Impacts:**

The Health Services Records Manager (Department Program Manager) position will be funded by multiple Public Health and Behavioral Health programs as part of a shared service model within the Department. The cost of this position will be allocated through the Admin Allocation to the Divisions within the Department.

The FY 19-20 budget includes appropriations and funding to cover this position as a vacant funded Accountant II position will be deleted. The Department will include future year costs for each year in the appropriate budget.

<b>Staffing Impacts:</b>			
<b>Position Title (Payroll Classification)</b>	<b>Monthly Salary Range (A-I Step)</b>	<b>Additions (Number)</b>	<b>Deletions (Number)</b>
Department Program Manager	6,559 - 7,973	1.0	0.0 <input type="checkbox"/>
Accountant II	5,500 - 6,684	0.0 <input type="checkbox"/>	1.0

**Narrative Explanation of Staffing Impacts (If Required):**

There are no impacts to staff. The Department of Health Services will work with the Human Resources Department on a recruitment to fill the Health Services Records Manager (Department Program Manager) position once the new allocation has been approved. The Accountant II allocation identified for deletion is vacant.

**Attachments:**

Personnel resolution

**Related Items "On File" with the Clerk of the Board:**

None