



# Medi-Cal Eligibility Data System (MEDSLITE) Policy

**Effective Date** 06/30/2010  
**Revised Date** 02/08/2024

DocuSigned by:  
*Dr. Georgina Yoshioka*  
7DF8077EFA674B2  
Georgina Yoshioka, DSW, MBA, LCSW, Director

**Policy** It is the policy of the Department of Behavioral Health (DBH) to adhere to privacy and security requirements in accordance with the Medi-Cal Privacy and Security Agreement between the California Department of Health Care Services (DHCS) and the San Bernardino County Department of Behavioral Health (DBH), as they relate to the Medi-Cal Eligibility Data System Lite (MEDSLITE).

**Purpose** Provide DBH staff with MEDSLITE requirements, specifically, the following:

- Allowable access
- General use of the system
- Security and privacy safeguards
- Unacceptable use
- Enforcement policies

**Note:** DBH is a covered entity bound to adhere to confidentiality and privacy laws mandated by the state and federal government (i.e., HIPAA, WIC 5328, 42 CFR Part 2). Staff must implement the laws and regulations required to provide the greatest degree of protection and autonomy for its clients.

**Definition(s)** **Department of Health Care Services (DHCS):** State department responsible for the administration of the Medi-Cal program and who oversees the administration of the Medi-Cal Behavioral Health – Policy Division (MCBH-PD).

**Medi-Cal PII:** Information directly obtained while performing an administrative function on behalf of Medi-Cal that can be used alone, or in conjunction with any other information, to identify a specific individual. Medi-Cal PII includes any information that can be used to search for or identify individuals or can be used to access their files.

Examples of Medi-Cal PII include the following:

- Name
- Social Security Number
- Social Security benefit data
- Date of birth
- Official State or government issued driver’s license or identification number

*Continued on next page*

## Medi-Cal Eligibility Data Systems (MEDSLITE) Policy, Continued

---

**Definition(s),**  
continued

**Protected Health Information (PHI):** Individually identifiable health information that is transmitted or maintained in any form or medium (electronic, paper, microfiche or verbal).

**MEDSLITE:** Medi-Cal Eligibility Data System that contains data from SSA that is related to Social Security beneficiaries, Supplemental Security Income beneficiaries, beneficiaries' eligibility for Medi-Cal, certain veterans' benefits, and certain tax return information.

**MEDSLITE Agreement:** Medi-Cal Privacy and Security Agreement between DCHS and DBH detailing privacy and security requirements of personally identifiable information of Medi-Cal beneficiaries accessed via MEDSLITE.

**MEDSLITE Training Materials:** Medi-Cal training materials detailing what to expect during the MEDS account set-up.

**MEDSLITE User Oath of Confidentiality:** DCSS User agreement in which employees acknowledge to adhere to MEDSLITE privacy and security requirements.

**MEDSLITE Coordinator:** Designated person within DBH that is the primary point of contact for DHCS regarding MEDSLITE who is responsible for MEDSLITE access i.e., determining staff eligibility, providing, and terminating, etc.

---

**Terms of the  
MEDSLITE  
Agreement**

Per the terms of the MEDSLITE Agreement, DBH is required to complete the following:

- Designate an Authorized Official;
  - Provide staff with MEDSLITE training material;
  - Establish and maintain oversight and monitoring for staff with authorized access;
  - Obtain confidentiality statements from staff approved for authorized access;
  - Ensure physical security of Medi-Cal PII;
  - Comply with computer security safeguards of Medi-Cal PII;
  - Implement and maintain paper document controls regarding Medi-Cal PII;
  - Notify and investigate breaches of Medi-Cal PII; and
  - Comply with the MEDSLITE Agreement.
- 

*Continued on next page*

## Medi-Cal Eligibility Data Systems (MEDSLITE) Policy, Continued

---

### Access Limitations for DBH and General Use

The MEDSLITE Agreement limits authorization to Medi-Cal Specialty Mental Health Services employees that assist in the eligibility determination of mental health services.

DBH staff with authorized access to MEDSLITE may use or disclose Medi-Cal PII only to perform functions, activities, or services directly related to the determination of eligibility for mental health services.

DBH has determined only applicable staff from the following programs are authorized and eligible for MEDSLITE access:

- Access Unit
- Community Crisis Response Teams
- Crisis Walk-In Clinics
- Diversion
- Financial Interviewers
- Information Technology
- Quality Management
- Business Office

---

### Security and Privacy Safeguards

It is the responsibility of the Department to ensure the following safeguards are in place to protect the security and privacy of MEDSLITE PII:

- Physical Security
- Computer Security
- System Security
- Audit Controls
- Paper Document Controls

DBH staff having authorized access to MEDSLITE are responsible to safeguard Medi-Cal PII from loss, theft or inadvertent disclosure with the following security and privacy safeguards, including but not limited to the following:

- Accessing and using MEDSLITE to perform official job duties as they associate to the determination of eligibility for mental health services;
- Adhering to County and DBH Dress Code by wearing identification badge to identify themselves as DBH employee;
- Maintaining the confidentiality of the MEDSLITE login information;
- Creating and utilizing a password in accordance with DBH Policy User I.D. and Password Policy (IT5009);
- Using one's own MEDSLITE login and password to access MEDSLITE;
- Maintaining possession of Medi-Cal PII on DBH grounds;
- Securing printed Medi-Cal PII from inappropriate access, not leaving on printers, fax machines or copiers;

---

*Continued on next page*

## Medi-Cal Eligibility Data System (MEDSLITE) Policy, Continued

---

### Security and Privacy Safeguards, continued

- Maintaining possession of Medi-Cal PII when transporting in a vehicle or airplane;
- Preventing unauthorized users or visitors the ability to access, control, or view Medi-Cal accessed via MEDSLITE;
- Locking the computer if MEDSLITE screens are up to prevent access or view of Medi-Cal PII;
- Disposing of Medi-Cal PII properly in locked shred containers;
- Adhering to DBH Policy Sending Confidential Information by Facsimile Policy (COM0901) when sending faxes;
- Adhering to DBH Policy Electronic Transfer of Client PHI (COM0909) regarding the sending of electronic mails;
- Adhering to DBH Policy Device and Media Controls Policy (IT5008) regarding the use of communication devices with proper control mechanisms and approval;
- Reporting any anomalies, breaches, disclosures or acquisition of Medi-Cal PII to the DBH Office of Compliance immediately the same day as when identified as occurred or to have possibly occurred.

### Prohibited Use and Activities

DBH staff having authorized access are prohibited from the following activities regarding MEDSLITE and/or MEDSLITE PII, including but not limited to the following:

- Sharing password or login information;
- Making password or login information accessible to unauthorized persons;
- Providing MEDSLITE information or printouts to unauthorized persons, including but not limited to:
  - Other County departments
  - Contract agencies
- Removing MEDSLITE screen prints from DBH grounds;
- Failing to properly secure and store Medi-Cal PII in a locked cabinet;
- Leaving workstation monitor unlocked when unattended;
- Storing Medi-Cal PII in a vehicle;

---

*Continued on next page*

## Medi-Cal Eligibility Data Systems (MEDSLITE) Policy, Continued

---

### Prohibited Use and Activities, continued

- Permitting Medi-Cal to be checked in as luggage for an airline flight or other modes of public transportation;
  - Allowing access, use or view Medi-Cal PII to unauthorized persons;
  - Failing to adhere to DBH policies regarding the use of fax machines, electronic mail and/or other communication devices relating to Medi-Cal PII;
  - Accessing MEDSLITE for purposes other than to perform official job duties related to the determination of eligibility for mental health services.
- 

### MEDSLITE Screen Limitations

Mental Health Plans (MHPs), such as DBH, providing Medi-Cal Specialty Mental Health Services are authorized to receive limited data from MEDSLITE, including but not limited to data from the following screens:

- SDX: State Data Exchange
  - BENDEX: Beneficiary and Earnings Data Exchange Systems
  - SVES: State Verification and Exchange System
  - EVS: Enumeration Verification System
- 

### MEDSLITE Access and Contacts

DBH staff may refer to the MEDS Access and Contacts Procedure (COM0943-1) for requesting authorized access to MEDSLITE and to obtain information of the roles and responsibilities for MEDSLITE Contacts.

---

### Enforcement Policies

In order to meet the privacy and security requirements of the MEDSLITE Agreement, DBH shall adhere to this policy as well as the County and DBH policies listed in the Related Policies and Procedures section of this policy.

---

### Violations

Authorized DBH staff having access to MEDSLITE who access, disclose or use Medi-Cal PII in a manner or for a purpose not related to the determination of eligibility for mental health services may be subject to loss of MEDSLITE access, disciplinary action up to and including termination and/or civil or criminal liability.

---

*Continued on next page*

## Medi-Cal Eligibility Data Systems (MEDSLITE) Policy, Continued

---

### Related Policy or Procedure

#### DBH Standard Practice Manual:

- Sending Confidential Information by Facsimile Policy (COM0901)
- Confidentiality of Protected Health Information (COM0905)
- Unauthorized Access of Confidential Medical Records Policy (COM0907)
- Electronic Transfer of Client PHI (COM0909)
- Workstation and System Security Policy (COM0924)
- Data Integrity Policy (COM0925)
- Privacy and Security Incidents Sanctions Policy (COM0926)
- MEDSLITE Access and Contacts Procedure (COM0943-1)
- Privacy or Security Incident Policy (COM0944)
- Computer and Network Appropriate Use Policy (IT5004)
- Remote Access Policy (IT5006)
- Device and Media Controls Policy (IT5008)
- User I.D. and Password Policy (IT5009)

#### San Bernardino County Policy Manual:

- Non-Public Personally Identifiable Information: 14-02
- Health Insurance Portability and Accountability Act (HIPAA) Policy 14-03
- HIPAA Policy SP: Health Care Component Designation: 14-03SP1

---

### Reference(s)

CA Civil Code, Section 56 et al., California Confidentiality of Medical Information Act  
Medi-Cal Data Privacy and Security Agreement  
Social Security Act, Sections 1137 and 453  
Title 45 of the Code of Federal Regulations, Section 164 et al., Health Insurance Accountability and Portability Act of 1996  
Welfare and Institutions Code, Section 14100.2

---