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.

<table>
<thead>
<tr>
<th>Description of PHI</th>
<th>Who may disclose it?</th>
<th>Who may receive it</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Health</strong></td>
<td>General Health Provider</td>
<td>Patient's providers and providers’ staff for the purpose of treatment, diagnosis, or referral</td>
</tr>
<tr>
<td>(includes knowledge of Mental Health, Substance Use/Abuse, HIV/AIDS, STD conditions)</td>
<td></td>
<td>[Reference: Civil Code 56.10(a); HIPAA Treatment Exception]</td>
</tr>
<tr>
<td><strong>Mental Health</strong></td>
<td>Mental Health Provider</td>
<td>Any healthcare provider (any discipline) &quot;who has medical or psychological responsibility for the patient&quot;</td>
</tr>
<tr>
<td>(includes knowledge of General Health, Substance Use/Abuse, HIV/AIDS, STD conditions)</td>
<td></td>
<td>[Reference: W&amp;I Code 5328(a); HIPAA Treatment Exception]</td>
</tr>
<tr>
<td><strong>Drug/Alcohol Treatment Program</strong></td>
<td>Drug/Alcohol Treatment Program Provider</td>
<td>Only another member of the client's treatment team WITHIN the specific drug/alcohol treatment program Exception: a medical emergency</td>
</tr>
<tr>
<td>(includes knowledge of General Health, Mental Health, HIV/AIDS, STD Conditions)</td>
<td></td>
<td>[Reference: 42 CFR Part 2, section 2.12 (c)(3)]</td>
</tr>
<tr>
<td><strong>HIV/AIDS CCSF Health Service Provider Network</strong></td>
<td>HIV/AIDS CCSF Health Service Provider</td>
<td>Only another HIV Health Service provider who registers client in ARIES database.</td>
</tr>
<tr>
<td>(includes knowledge of General Health, Mental Health, Substance Use/Abuse, STD conditions)</td>
<td></td>
<td>[Reference: CCSF Local Share Mandate established with the California Office of AIDS]</td>
</tr>
</tbody>
</table>
Treatment Providers

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).

For purposes of care coordination and treatment, healthcare providers may be inside or outside the DPH Safety Net, but they and/or their agencies must be bound by state and federal confidentiality laws and/or DPH MOUs to be considered a “treatment provider” as noted in the above matrix.

The DPH Safety Net includes civil service, contract, and affiliate programs (such as those of UCSF and the SF Community Clinic Consortium).

The following are some examples of other treatment providers whose clients’ PHI may be shared for treatment and coordination purposes without an authorization:

1. Individual practitioners and treatment providers of private sector hospitals and clinics who are bound by state and federal confidentiality laws.
2. Providers who sell or dispense drugs, devices, equipment, or other items in accordance with a prescription.
3. (via MOU) Paramedics of the San Francisco Fire Department EMS
4. (via MOU) Case managers in the Human Services Agency Homeless Programs:
   a. HSA Behavioral Health Roving Team
   b. Housing Access Team
5. (via MOU) Case managers in the Department of Aging and Adult Services Case Management Programs:
   a. Bernal Heights Neighborhood Center’s
   b. Neighborhood Elders Support Team (NEST) Case Management Program
   c. Active Senior Case Management Program
   d. Episcopal Community Services’ Canon Kip Senior Center Case Management Program
   e. Curry Senior Center Case Management Program
   f. DAAS Adult Protect Services (APS) Case Management Program
   g. Family Service Agency Seniors Case Management Program
   h. IHSS (In Home Supportive Services) Consortium Case Management Program
   i. Institute on Aging
   j. MSSP (Multipurpose Senior Services) Case Management Program
   k. Linkages Case Management Program
   l. District Wide Social Services/District 5 Case Management Programs serving Mission, Noe Valley, Bernal Heights, Buena Vista, and Eureka Valley
   m. Neighborhood Resource Centers Case Management Programs serving Richmond District, Western Addition and the Mission
   n. Meals on Wheels Case Management Program
   o. San Francisco Senior Centers Case Management Programs
   p. Self-help for the Elderly Case Management Program
   q. On Lok 30th Street Senior Services Case Management Program

6. (via MOU) Care Coordinators of the San Francisco Health Plan

Questions about who is and who is not a health service provider should be directed to your Privacy Officer.