Item 2-1

First 5 Commission of San Diego

Subject: Notification of Use of Client Information

REFERENCE:
County of San Diego Health and Human Services Agency Policy HHSA-L6 (Provision of Notice of Privacy Practices)

Purpose

To establish a process to appropriately provide recipients of services funded through the First 5 Commission of San Diego (Commission) with information about their privacy rights and the use of program data for evaluation.

Background

The Commission is committed to supporting programs that provide the best outcomes for children and families. The First 5 Commission of California (First 5 California) requires the Commission to do program evaluation as part its efforts to measure and promote the effectiveness of programs, the efficient use of resources and public accountability. As part of evaluation activities, Commission programs report data about client services. The data are aggregated and do not identity any individual client. The purpose of this policy is to provide clients with adequate notice regarding the use of their information for program evaluation.

Types of Notification for Use in Commission-Funded Programs

There are two types of notification for Commission-funded programs.

1. Clients receiving Commission-funded services shall receive a Commission Notice of Privacy Practice (NPP) at the first opportunity.
2. Contractors may follow notification procedures required by their institution or required by funding requirements.

Commission contracts will identify which services require the Commission NPP.

Contractors engaged in activities co-funded by the First 5 Commission of California shall follow that agency's authorization process and requirements.

A. Procedures for Notices of Privacy Practices:

1. Recipients of the Notice

Clients receiving Commission-funded services shall receive a Commission-authorized NPP that has been reviewed and approved by the County Privacy Officer. This applies to clients receiving services in programs where an NPP is required per contract obligations. This does not apply to programs jointly funded by First 5 California.

2. Process for Providing the NPP

The Contractor will provide the NPP to the client no later than the first date of the first service delivery. A copy of the NPP will be provided to all clients and may be provided electronically. The Contractor will distribute the NPP to individuals with limited English proficiency in their primary language, or provide interpreter services if the NPP is not available in the individual's language. The NPP will be maintained as a separate document and will not be combined with any other document.

B. Procedures for Projects Jointly Funded by the First 5 Commission of California:

1. Recipients of the NPP

Clients receiving services funded in some portion by First 5 California shall receive the authorization form required by First 5 California.

2. Process for Providing the Notice

Contractors providing services funded in some portion by First 5 California shall follow First 5 California notification process.

C. General Procedures for Client Notification

These procedures shall apply to all cases where client notification is required.

1. Obtaining an Acknowledgement of Receipt

Except in the case of an emergency treatment situation, the Contractor will make a good faith effort to obtain written acknowledgement that the individual received the NPP. If the individual refuses to sign the acknowledgement, Contractor staff will document the efforts taken and the reason why the acknowledgement was not obtained.

2. Notification for Minors

The NPP will be provided to the parent or guardian of a minor.

3. Revisions to the NPP

The Commission will promptly revise, and the Contractor will distribute the NPP to active clients whenever there is a material change to the uses or disclosures, individual's rights, the Contractor's legal duties, or other privacy practices stated in the notice. The

Commission will distribute the notice within sixty (60) days to all Contractors covered by the applicable notice.

4. Retention of Documentation

A copy of each version of the NPP will be retained for five (5) years by the Contractor. Signed and unsigned acknowledgements will be filed with the individual's record and will be retained in accordance with Contractor's policies for record retention.

Sunset Review October 2030

Originally Approved: June 7, 2010 (1)

Revised: June 17, 2013 (3); October 17, 2016 (3); October 10, 2019 (3); October 13, 2022 (3)

Approved:

November 13, 2025 2.
Date Commission Item No