

## SHIPM – Update Log

Section	Page(s)	Change
Entire SHIPM (including attachments)	All	The following updates were made throughout the SHIPM (note: these non-substantive changes did not update the review/update dates of individual policies): <ul style="list-style-type: none"> <li>Updated full name of California Health &amp; Human Services per Agency standard</li> </ul>
2.1.1 – Authorizations	17 - 21	Stakeholder input and legal review found the Federal Trade Commission (FTC) Act does not apply to state government entities – references to FTC were removed from the policy: <ul style="list-style-type: none"> <li>III.A and B.</li> <li>Removed item D.11 (regarding FTC Act requirements)</li> <li>IV. References - removed citation reference for FTC Act</li> </ul> <p>Updated III.D</p> <ul style="list-style-type: none"> <li>III.D.1 to remove 45 C.F.R. reference</li> <li>III.D.2 to add psychotherapy notes (e.) and abortion-related services (f.).</li> </ul> <p>AB1697 - Uniform Electronic Transactions Act. (Chapter 374, October 7, 2023) – updated:</p> <ul style="list-style-type: none"> <li>III.D.6 to add “event” as an item for expiration. Removed explanation about HIPAA allowing event while CA Civil Code does not – this no longer applies with the passage of AB 1697. In addition, moved existing item regarding when signed by a parent to sub-bullet (b) along with new item regarding limitations of expiration date or event (a).</li> <li>III.D.7 updated to reflect signature may be handwritten or electronic.</li> <li>III.D.9 updated CA Civil Code citation</li> <li>III.E.3.a to add “event”</li> </ul>
2.2.6 – Decedents	23 – 24	Updated III.B.2 to remove references to funeral directors. Also updated IV. References to remove citations associated with funeral directors.
2.2.17 – Health Information Exchange (HIE)	72, 74, 75	Updated II. Policy to: <ul style="list-style-type: none"> <li>Add psychotherapy notes and reproductive health services.</li> <li>Include note regarding the California Health</li> </ul>

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		<p>Data Exchange.</p> <p>Updated III.C.2 to add reference to “a Qualified Health Information Organization certified by CDII” in the list of examples.</p> <p>Updated III.C.3.e to add final sentence regarding state entities may sign the DxF Data Sharing Agreement instead of CalDURSA.</p>
2.2.19 – Information Blocking	78 – 79	New policy to address Federal 21 <sup>st</sup> Century CURES Act and California Data Exchange.
2.3.2 – HIV/AIDS Information	83 - 84	<p>AB1697 - Uniform Electronic Transactions Act. (Chapter 374, October 7, 2023) – this bill updated/shifted citation numbering. Updates to citation numbering found in:</p> <ul style="list-style-type: none"> <li>• III.C</li> <li>• IV. References</li> </ul>
2.3.4 – Substance Use Disorder Treatment	91 - 98	Entire policy updated to reflect the Final Rule for 42 CFR Part 2 (published February 2024).
2.3.7 – Reproductive Health Care	108-112	New policy to reflect the Final Rule for HIPAA Privacy Rule to Support Reproductive Health Care Privacy (published April 2024).
2.4.1 – Breach and Breach Notification	114 – 116; 118	<p>Updated III.D.2 (and IV. References) to clarify breach reporting to CDPH for entities licensed under Health and Safety Code.</p> <p>Updated III.D.3 and 4 to clarify timeframes for reporting a breach to CDII</p>
2.6.1 – Incidental Disclosures	125	Removed III.D regarding Notice of Privacy Practices since it does not apply to this policy. Also removed reference to 5.3.1 policy in V. Related Policies
3.3.4 – Integrity	183 - 184	Updated references to NIST SP 800-66 throughout policy to reflect recent revision (revision 2; published February 14, 2024)
3.3.5 – Access Controls	186 - 187	Updated III.B.2 and IV. References to reflect recent updates to CA SAM 4983.1
3.4.1 – Documentation	191	Added III.D.3 to reflect CDII’s new annual attestation
4.1.1 – Policies and Procedures	195	Updated III.A.4 to reflect CDII’s new annual attestation
4.1.6 – Waiver of Rights Related to HIPAA Complaints	210	Updated II. Policy and III.A to clarify policy regarding business associates.

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4.4.1 – Business Associate Agreement	218, 221, 222	<p>Updated II. Policy to reflect new BAA template for use when conducting business with a no view Host Services Provider (HSP) or a Cloud Services Provider (CSP)</p> <p>Updated III.I.15 to correct numbering – non-substantive change</p> <p>Updated VI. Attachment to reflect new BAA template for no view HSP or a CSP</p>
5.3.1 – Notice of Privacy Practices	248, 250, 251	<p>Updated III.A to reflect CDII’s review of the NPP materials. An updated “general” use NPP template and another template for substance use disorder</p> <p>Removed of III.F (and following items renumbered to reflect removal)</p> <p>IV. Attachments updated to reflect removal of Attachment B – Notice of Privacy Practices Guidance Tool (duplicated items in the policy) – it was with Attachment B – SUD Model Template Notice of Privacy Practices</p>
5.5.1 – Restriction for Self-Pay	261	Updated III.A to clarify which state entities the policy applies – those that function as direct care (pay) providers or health plans
5.5.2 – Confidential Communication	264	Updated II. Policy and III.A.1 to clarify which state entities the policy applies – those that function as direct care (pay) providers or health plans
SHIPM Definitions	271, 281, 288	<p>New definitions added for:</p> <ul style="list-style-type: none"> <li>- Data Exchange Framework (DxF)</li> <li>- Information Blocking</li> <li>- Reproductive Health Services Information</li> </ul>

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Attachment 2.1.1 – Authorization for Release of Information	1, 2	<p>Updated “Description of the Information to be Released” item to:</p> <ul style="list-style-type: none"> <li>- reflect the correct types of confidential information covered by the authorization</li> <li>- add “event” to “For the following period of time...” item</li> <li>- add note regarding types of information that require a separate authorization for each disclosure</li> </ul> <p>Updated the verbiage within “This authorization for release...” to include “or event” with regards to expiration</p>
Attachment 4.4.1 - HIPAA Business Associate Agreement (template) – for no view HSP or CSP	New	New BAA template for use when conducting business with a no view Host Services Provider (HSP) or Cloud Services Provider (CSP).
Attachment 5.3.1 A – Model Template Notice of Privacy Practices	1, 8	<p>Removed “Note” from end of first paragraph on page 1.</p> <p>Removed “Prominently display the following information” from the Model Notice of Privacy Practices section on page 1.</p> <p>Added “Note” regarding Reproductive Health Care Services to the “Respond to lawsuits and legal actions” item in the Our Uses and Disclosures of your Health Information section on page 8.</p>
Attachment 5.3.1 B – SUD Model Template Notice of Privacy Practices	New	<p>New attachment to reflect the Final Rule for 42 CFR Part 2 (published February 2024).</p> <p>Note: this document replaces the old B which was guidance on the NPP which has been incorporated into the NPP policy.</p>
Attachment 5.3.1 D – Notice of Privacy Practices FAQ	3	New question added to address additional SUD NPP per the Final Rule for 42 CFR Part 2 (published February 2024).