

System Letter

NUMBER: 18-01
SUBJECT: Protected Health Information Exclusion from System
REFERENCES: Government Code §11895(b); ODMF 1742

April 18, 2018

**TO: Agency Secretaries
Department Directors
Departmental Budget and Accounting Officers**

FROM: FI\$Cal

This FI\$Cal system letter provides departments and agencies with instructions for transacting in the system when transactions involve Protected Health Information (PHI). FI\$Cal is an accounting and financial management system responsible for processing financial transactions, which may in some instances relate to payment for healthcare. FI\$Cal is not a business associate since it will not perform or assist in the performance of any activity involving use or disclosure of individually identifiable health information. (Title 45 Code of Federal Regulations section 160.103)

The provision of services provided by FI\$Cal will not accommodate the disclosure of PHI in any transaction. Accordingly, departments that use FI\$Cal for accounting, payments and financial management shall not disclose PHI to or in the system, or attach PHI to any field within the system. Departments must ensure proper role provisioning and training commensurate with National Institute of Standards and Technology protocols, policies and procedures to ensure only those persons necessary perform transactions involving PHI. Likewise, FI\$Cal will contain job aids, warning messages and preclusions from entering or attaching PHI in the System.

For those departments that execute transactions which may contain PHI, the following procedures will apply when using FI\$CAL:

Procure to Pay

- Departments will be prompted to flag a transaction as PHI-related for the purpose of a potential post audit by the State Controller's Office. A warning box will preclude users from attaching PHI.

- Departments will use the delivered remittance advice and warrant functionality to pay all vendors without including PHI. When an invoice number contains PHI, departments must work with vendors to change the invoice number.
- Departments will be responsible for developing a way to cross reference FI\$Cal transactions and associated documents.
- Departments will make documents with PHI available to SCO for post audits when required by law.
- Departments will not enter PHI in any transaction in FI\$Cal.
- Departments will not attach documents with PHI.

Order to Cash

- Departments will make documents with PHI available to SCO for post audits when required by law.
- Departments will be responsible for cross referencing FI\$Cal transactions and associated documents.
- Departments will not enter PHI in any transaction in FI\$Cal.
- Departments will not attach documents with PHI.

Agency Trust Accounts

- Departments should use Agency Use field to link the patient to the receivable.
- Central Treasury System (CTS) Accounts are tied to departments, not patients. Hence, no customer name is required. The State Treasurer's Office does not see patient names, only department CTS Account name and location.
- Departments will not enter PHI in FI\$Cal for issuance of payments from the Agency Trust.