SHIPM – 2026 Update Log

CENTER FOR DATA INSIGHTS AND INNOVATION
CALIFORNIA HEALTH & HUMAN SERVICES AGENCY

Section	Page(s)	Change
1.1.1 - CDII Authority	13-14	• Expanded the policy framing from HIPAA compliance to broader health information privacy laws, including the Confidentiality of Medical Information Act and Information Practices Act. • Expanded CDII's federal coordination responsibilities to include substance use disorder privacy discussions and updated terminology concerning statewide privacy compliance, website content, and legislative review. • Updated related statutory citations and terminology.
1.2.1 - State Agency Responsibility	16-17	• Updated III.B to recognize that a state entity may receive a written CDII exemption from a specific SHIPM policy or policy provision. • Updated Health and Safety Code citations and made editorial terminology and formatting corrections.
1.3.1 - SHIPM Exemption Request (New)	18-19	• Added a new policy establishing the process and qualifying criteria for state entities to request an exemption from a SHIPM policy or policy provision. • Added requirements to identify the requested exemption, explain how applicable law will remain satisfied, justify why the exemption is needed, and avoid sending health information to CDII. • Clarified that CDII evaluates requests case by case and may request a meeting or supplemental documentation.
2.1.1 - Authorizations	24	• Added III.G directing state entities to SHIPM section 2.3.4 for 42 C.F.R. Part 2 authorization requirements.
2.2.14 - Treatment, Payment and Health Care Operations (TPO)	72-73	• Updated III.A.1.a.ii to expressly include value-based arrangements within treatment activities. • Added OCR's HIPAA Privacy Rule and Care Coordination (2019) to the references.

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2.3.4 - Substance Use Disorder Treatment	97, 101-102	• Clarified that Part 2 policies and procedures must, at a minimum, address the listed safeguards. • Added requirements to identify Part 2-protected data within systems and document compliance decisions, including decisions to approve or deny disclosure requests. • Added a requirement to demonstrate the ability to apply Part 2 consent and redisclosure restrictions through documented policies, procedures, and training.
2.3.7 - Reproductive Health Care	115-117	• Retitled III.A as General Use and Disclosure Within California. • Removed the former federal reproductive health care prohibition, presumption, and attestation provisions, including former III.F through III.H and the 45 C.F.R. section 164.509 reference. • Retained California-specific use and disclosure protections and renumbered the remaining prohibited-use provisions.
2.4.1 - Breach and Breach Notification	119	• Added III.B.4 addressing breaches involving 42 C.F.R. Part 2 records, including evaluation and reporting under applicable breach-notification requirements and OCR enforcement. • Added III.C.4 requiring the breach risk assessment to consider whether Part 2 records were involved and whether consent or redisclosure restrictions were violated.

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3.1.4 - Security Management Process	156-162	• Expanded the risk analysis requirements to address applicable federal and State data-security considerations, including data access, third-party handling, data transfer, and emerging technologies such as artificial intelligence when protected health information is involved. • Added III.C.1.c requiring system designation documentation to align with current SIMM 5330 requirements and directing entities not to use retired SIMM 5330 submission artifacts. • Updated wording, numbering, and references throughout the policy.
3.1.5 - Security Awareness and Training	163-165	• Added III.A.5 requiring AI security-awareness training addressing risks of entering health information into AI tools, AI system limitations, and acceptable use of AI systems. • Updated wording for clarity and consistency.
3.1.6 - Security Evaluations	167	• Added direction that security evaluations consider risks associated with data access and third-party involvement, including vendor and service-provider handling of protected health information, as appropriate to the entity's environment and operations.
3.1.7 - Verification of Identity (Person or Entity Authentication)	168	• Updated III.B from ‘responsible to obtain’ to ‘responsible for obtaining’ documentation used to verify a requester’s identity and authority.
4.4.1 - Business Associate Agreement	225-228	• Clarified that the business associate agreement must ensure the business associate complies with applicable requirements. • Made editorial, grammar, punctuation, and consistency corrections throughout the policy.
4.4.2 - Oversight of Business Associates	231-232	• Updated the Purpose, Policy, and III.A to replace ‘responsible to conduct/develop’ with ‘responsible for conducting/developing’ and corrected wording in III.B.6.

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SHIPM Definitions - Treatment	301	• Expanded the Treatment definition to include care coordination and management activities conducted as part of value-based care arrangements to improve patient outcomes and quality of care. • Added OCR's HIPAA Privacy Rule and Care Coordination (2019) as a source.

Note: Page references correspond to the PDF page numbers in 2026SHIPM_ADA.2.pdf.

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