

**REPORT/RECOMMENDATION TO THE BOARD OF SUPERVISORS  
OF SAN BERNARDINO COUNTY  
AND RECORD OF ACTION**

November 5, 2024

**FROM**

**LEONARDO GONZALEZ, Director, Human Resources Department**

**SUBJECT**

Non-Financial Business Associate Agreement with Union First Insurance Solutions, LLC for Exchange of Protected Health Information

**RECOMMENDATION(S)**

Approve non-financial **Business Associate Agreement No. 24-1064** with Union First Insurance Solutions, LLC, for the purposes of exchanging certain protected health information for employees who elect medical, dental, and vision plans provided by the Sheriff's Employees' Benefit Association Healthcare Trust, effective retroactively beginning June 11, 2024, through December 31, 2027.

(Presenter: Leonardo Gonzalez, Director, 387-5565)

**COUNTY AND CHIEF EXECUTIVE OFFICER GOALS & OBJECTIVES**

**Operate in a Fiscally-Responsible and Business-Like Manner.**

**FINANCIAL IMPACT**

Approval of this item will not result in the use of additional Discretionary General Funding (Net County Cost), as the exchange of protected health information (PHI) is non-financial in nature.

**BACKGROUND INFORMATION**

On June 11, 2024 (Item No. 106), the Board of Supervisors approved side letter agreements between the County and the Sheriff's Employees' Benefit Association (SEBA) allowing SEBA to establish and implement a Healthcare Trust (Trust) for SEBA members in the Safety Unit, Safety Management and Supervisory Unit, Specialized Peace Officer Unit, Specialized Peace Officer Supervisory Unit, and Specialized Fire Services Unit (Units).

Since the approval of these side letter agreements, the Human Resources Department (HR) has been working with SEBA and Union First Insurance Solutions, LLC (Union First) on the implementation of the Trust. Union First is the benefits consultant and third-party administrator of the Trust and will be administering the Trust's medical, dental and vision plans. A Business Associate Agreement between the County and Union First is needed to ensure compliance with applicable law (e.g. Health Information Patient Protection Act) when exchanging certain PHI. The County will exchange with Union First eligibility and contribution files containing information for plan members in accordance with the side letter agreements and Business Associate Agreement.

A Business Associate Agreement was not recommended at the time the side letters were approved, as an early commencement of information exchange was not necessary. To ensure

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compliance and to coincide with approval of the side letter agreement, HR recommends approval of this item, retroactively to June 11, 2024. There are no financial implications associated with this agreement.

**PROCUREMENT**

Not applicable.

**REVIEW BY OTHERS**

This item has been reviewed by County Counsel (Jose Mendoza, Deputy County Counsel, 387-5455) on October 28, 2024; Finance (Abigail Grant, Administrative Analyst, 387-4603) on October 21, 2024; and County Finance and Administration (Paloma Hernandez-Barker, Deputy Executive Officer, 387-5423) on October 28, 2024.

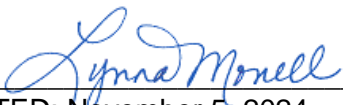
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Record of Action of the Board of Supervisors  
San Bernardino County

**APPROVED (CONSENT CALENDAR)**

Moved: Joe Baca, Jr. Seconded: Curt Hagman  
Ayes: Col. Paul Cook (Ret.), Jesse Armendarez, Dawn Rowe, Curt Hagman, Joe Baca, Jr.

Lynna Monell, CLERK OF THE BOARD

BY   
DATED: November 5, 2024



cc: HR - Wakcher w/agree  
Contractor - c/o HR w/agree  
File - w/agree  
CCM 11/7/2024