

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

December 16, 2025

FROM

JAMES LOCURTO, Director, Transitional Assistance Department

SUBJECT

Non-Financial Memorandum of Understanding with Inland Empire Health Plan for Data Sharing

RECOMMENDATION(S)

Approve non-financial **Memorandum of Understanding No. 25-1118**, including non-standard terms, with Inland Empire Health Plan for the exchange of information regarding mutual customers to promote retention and successful renewals for Medi-Cal coverage, for the period of December 6, 2025 through December 31, 2030.

(Presenter: James LoCurto, Director, 388-0245)

COUNTY AND CHIEF EXECUTIVE OFFICER GOALS & OBJECTIVES

Provide for the Safety, Health and Social Service Needs of County Residents.

Pursue County Goals and Objectives by Working with Other Agencies and Stakeholders.

FINANCIAL IMPACT

Approval of this item does not impact Discretionary General Funding (Net County Cost) as this Memorandum of Understanding (MOU) is non-financial in nature.

BACKGROUND INFORMATION

The Transitional Assistance Department (TAD) administers public assistance programs in San Bernardino County (County), including Medi-Cal, California's Medicaid program serving low-income and disabled individuals. Eligibility for Medi-Cal must be reevaluated on an annual basis. Failure to complete and return an annual renewal to TAD can result in loss of benefits for individuals and families.

Inland Empire Health Plan (IEHP) is a Local Initiative Health Plan formed pursuant to Welfare and Institutions Code section 14000, et seq., through a Joint Powers Agreement between the counties of Riverside and San Bernardino; operates in compliance with the Knox-Keene Health Care Services Act of 1975; and arranges and pays for the provision of covered Medi-Cal services to eligible Medi-Cal members residing in the County.

Under the terms of the recommended MOU, IEHP will provide TAD with a complete list of County IEHP Members (Members) on a monthly basis. To promote retention and successful renewals, IEHP will conduct general outreach to Members to encourage the completion and return of their renewal packets or provide needed information to TAD, as permitted by federal and state law. TAD will provide IEHP with weekly lists of Members whose cases require annual redetermination, monthly lists of those Members that were discontinued, and monthly lists of Members who were scheduled to disenroll.

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The MOU contains non-standard terms that require approval by the Board of Supervisors (Board) per County Policy 11-05. The non-standard terms include the following:

1. The agreement does not require IEHP to meet the County's insurance standards as required pursuant to County Policy 11-07.
 - The County Policy requires partner agencies to carry appropriate insurance at limits and under conditions determined by the County's Risk Management Department.
 - Potential Impact: The agreement does not include County standard insurance requirements. The County has no assurance that IEHP will be financially responsible for claims that may arise under the agreement, which could result in expenses to the County.
2. The County is required to indemnify IEHP from any and all claims, actions, losses, damages, and/or liability arising out of this Agreement, but only to the extent actually caused by the negligent acts, errors or omissions of the County.
 - The County standard contract does not include any indemnification or defense by the County of a contractor.
 - Potential Impact: By agreeing to indemnify IEHP, the County could be contractually waiving the protection of sovereign immunity. Claims that may otherwise be barred against the County, time limited, or expense limited could be brought against IEHP without such limitations and the County could be responsible for reimbursing IEHP for costs, expenses, and damages.

TAD recommends approval of the MOU with IEHP, including the non-standard terms, to ensure that County IEHP Members receive accurate and timely information regarding their eligibility and/or successful renewals for Medi-Cal coverage.

The most recent MOU No. 21-106 with IEHP for data sharing expired on December 5, 2025. The recommended MOU will continue data sharing of IEHP Members between TAD and IEHP for annual redetermination of Medi-Cal coverage, effective retroactively to December 6, 2025. This item is being presented to the Board at this time, as this is the first date available for presentation following negotiation and the required operational, fiscal, and legal reviews. Approval by the Board on this date is imperative to prevent any significant impact to the annual redetermination of Medi-Cal coverage for IEHP Members.

PROCUREMENT

Not applicable.

REVIEW BY OTHERS

This item has been reviewed by Human Services (Lisa Rivas-Ordaz, Contracts Manager, 388-0222) on November 26, 2025; County Counsel (Adam Ebright, Deputy County Counsel, 387-5455) on December 3, 2025; Risk Management (Stephanie Mead, Staff Analyst II Trainee, 386-9044) on December 3, 2025; and County Finance and Administration (John Hallen, Principal Administrative Analyst, 388-0208) on December 3, 2025.

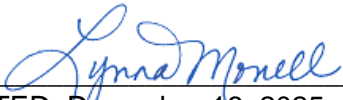
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Record of Action of the Board of Supervisors
San Bernardino County

APPROVED (CONSENT CALENDAR)

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

Lynna Monell, CLERK OF THE BOARD

BY _____
DATED: December 16, 2025



cc: TAD - Ettari w/agree
 Contractor - c/o TAD w/agree
 File - w/agree
CCM 12/30/2025