



BOARD OF SUPERVISORS
AGENDA LETTER

Agenda Number:

Clerk of the Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101
(805) 568-2240

Submitted on:
(COB Stamp)

Department Name: Behavioral Wellness
Department No.: 043
Agenda Date: July 1, 2025
Placement: Administrative Agenda
Estimated Time: N/A
Continued Item: No
If Yes, date from:
Vote Required: Majority

TO: Board of Supervisors
FROM: Department Director: Antonette Navarro, LMFT, Director
Department of Behavioral Wellness
Contact: Chris Ribeiro, Chief Financial and Administrative Officer
Department of Behavioral Wellness
SUBJECT: Agreement with Clearwater Security & Compliance LLC for Information Technology Services for Fiscal Year 2025-28

County Counsel Concurrence

As to form: Yes

Other Concurrence: Risk Management

As to form: Yes

Auditor-Controller Concurrence

As to form: Yes

Other Concurrence: Information Technology

As to form: Yes

Recommended Actions:

That the Board of Supervisors:

- a) Approve and authorize the Chair to execute an Agreement for Services of Independent Contractor with **Clearwater Security & Compliance LLC** (not a local vendor) for the provision of an annual software as a service subscription of Integrated Risk Management, a cyber risk management system, for a total maximum contract amount not to exceed **\$294,996**, inclusive of \$98,332 per fiscal year, for the period of July 1, 2025, through June 30, 2028;
- b) Delegate to the Director of the Department of Behavioral Wellness or designee the authority to suspend, delay, or interrupt the service under the Agreement for convenience per Section 20 of the Agreement, to make immaterial changes to the Agreement per section 26 of the Agreement without altering the maximum agreement amount and without requiring the Board of Supervisors' approval of an amendment of the Agreement, subject to the Board of Supervisors' ability to rescind this delegated authority at any time; and
- c) Determine that the above-recommended actions are not a project that is subject to environmental review under the California Environmental Quality Act (CEQA), pursuant to CEQA Guidelines section 15378(b)(4), finding that the actions are governmental funding

mechanisms and/or fiscal activities that will not result in direct or indirect physical changes in the environment.

Summary Text:

The above-referenced item is on the agenda to request the Board of Supervisors to approve and authorize the Chair to execute an Agreement for Services of Independent Contractor with **Clearwater Security & Compliance LLC (Clearwater)** (not a local vendor), for the annual software subscription of a risk assessment program, with a total maximum contract amount not to exceed \$294,996 for the period of July 1, 2025, through June 30, 2028. The approval of the recommended actions will allow the Department of Behavioral Wellness (BWell) to continue to efficiently identify exposures, manage and reduce the likelihood of a breach, save time and money, and meet HIPAA compliance requirements by identifying threats and vulnerabilities. This agreement will provide a risk analysis of BWell's Electronic Protected Health Information along with actionable steps to improve security.

Discussion:

Clearwater performs information technology security assessments of BWell systems, which includes the completion of an annual security risk assessment that will enable the County to meet explicit Health Insurance Portability and Accountability Act (HIPAA) Security Rule requirements for risk analysis, as mandated by 45 C.F.R. Section 164.308 (a)(1)(ii)(A). Performance of this risk assessment will also help the County demonstrate the adoption of recognized security practices under Public Law 116-321 and identify, rate, and prioritize all risks to the specific information assets used to create, receive, maintain, and/or transmit its Electronic Protected Health Information.

Background:

The Department of Behavioral Wellness provides a continuum of mental health and substance use disorder services for Santa Barbara County Medi-Cal patients, including ancillary services for Alcohol and Drug Programs and Mental Health Services. Clearwater first contracted with BWell for Information Technology (IT) security risk assessment services on September 26, 2018.

This Agreement will provide an IT security risk assessment for three (3) more years for BWell, as required by BWell's policy and procedure 14.001, 45 CFR Section 164.308 (a)(1)(ii)(A), and the National Institute of Standards and Technology Special Publications describing risk assessments, risk management, and controls. The scope of the risk analysis will include information assets used by BWell to create, receive, maintain, or transmit sensitive information. Contractor and BWell will determine the information assets to be analyzed each program year through execution of the Information Asset Inventory.

Clearwater's service also provides a comprehensive tool for managing compliance with the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Breach Notification Rules. The software performs an assessment of BWell's compliance with these rules, identifies gaps in our compliance program, and provides a management plan to remediate gaps.

The Security Risk Assessment Program includes overall program support by a designated program leader, planning and preparation of schedule by Contractor and BWell staff, and performance of site visits and reviews by contractor consultants.

Fiscal and Facilities Impacts:

Budgeted: Yes

Fiscal Analysis:

Funding Source	FY 2025-26	FY 2026-27	FY 2027-28	Total
General Fund				
State	\$49,166	\$49,166	\$49,166	\$147,498
Federal	\$49,166	\$49,166	\$49,166	\$147,498
Total	\$98,332	\$98,332	\$98,332	\$294,996

Funding for this service will be from Federal and State sources such as Medi-Cal Revenue and Mental Health Services Act allocations. Funding associated with this contract is included in the FY 2025-26 Recommended Budget.

Special Instructions:

Please email one (1) complete signed Board Contract and one (1) Minute Order to David Russo at drusso@sbcbswell.org and the BWell Contracts Division at bwellcontractsstaff@sbcbswell.org.

Attachments:

Attachment A – Clearwater FY 2025-28 BC Agreement

Contact Information:

David Russo

Contract Analyst

drusso@sbcbswell.org