



BOARD OF SUPERVISORS

AGENDA LETTER

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

Agenda Number:

Submitted on:
(COB Stamp)

Department Name: Behavioral Wellness
Department No.: 043
Agenda Date: January 13, 2026
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: Ryan Weyman, Branch Chief of IT
Department of Behavioral Wellness

SUBJECT: First Amendment to the Services Agreement with Clearwater
Compliance LLC for Information Technology Services for Fis

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County Counsel Concurrence

As to form: Yes

Other Concurrence: Risk Management

As to form: Yes

Auditor-Controller Concurrency

As to form: Yes

Other Concurrence: Executive Information Technology Council

As to form: Yes

Recommended Actions:

That the Board of Supervisors:

- a) Approve, ratify, and authorize the Chair to execute a First Amendment to the Agreement for Services of Independent Contractor with Clearwater Security & Compliance LLC (not a local vendor) (BC No. 24-303) to increase the contract amount by \$25,000 for risk analysis site visit-related travel expenses for a revised, total maximum contract amount not to exceed **\$319,996**, with no change to the contract term of July 1, 2025, through June 30, 2028; and
- b) Determine that the above-recommended action is 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 action is a governmental funding mechanism and/or fiscal activity that will not result in direct or indirect physical changes in the environment.

Summary Text:

The Board of Supervisors is requested to authorize the Chair to execute a First Amendment to the Agreement f with Clearwater Security & Compliance LLC (Clearwater) to add a line item for travel

expenses in the amount of \$25,000. This revision increases the total maximum contract amount to \$319,996 but does not change the contract term of July 1, 2025, through June 30, 2028.

Discussion:

Clearwater performs a variety of information technology security assessments, including an annual security risk assessment that will enable the County to meet explicit Health Insurance Portability and Accountability Act (HIPAA) Security Rule requirements. Annually, Clearwater must send a representative to perform the on-site portion of these assessments. Travel expenses associated with the on-site assessments are to be borne by the County. On-site assessment visits are expected to be two to three days for two consultants.

The approval of the recommended action will modify the Agreement to clearly state that the County is responsible for these travel expenses and to define the maximum travel expenses for the Agreement.

Background:

The Department of Behavioral Wellness provides a continuum of behavioral health services for Santa Barbara County Medi-Cal patients. Clearwater first contracted with BWell for Information Technology (IT) security risk assessment services on September 26, 2018. The original agreement and the first renewal agreement included estimated travel expenses as part of the rate schedule.

Clearwater provides IT security risk assessment and analysis services, as required by BWell's policies and procedures; as well as local, state, and federal regulations. The scope of the risk analysis includes information assets used by BWell to create, receive, maintain, or transmit sensitive information. Conducting this annual risk assessment also helps the County demonstrate the adoption of recognized security practices under Public Law 116-321. The assessment also allows BWell to identify, rate, and prioritize all risks to the specific information assets used to create, receive, maintain, and/or transmit Electronic Protected Health Information. Each program year, Clearwater and BWell determine the information assets to be analyzed through the execution of the Information Asset Inventory. These assessments require an annual on-site visit.

Performance Measures and Outcomes:

Annual Completion of IT Security Risk Assessment

Performance Measure: Clearwater completes the annual IT Security Risk Assessment, including discovery, analysis, and delivery of the Findings, Observations, and Recommendations Report, within the agreed-upon timeline.

- Outcome: County of Santa Barbara Behavioral Wellness has met the HIPAA Security Rule requirements for annual risk analysis every year since 2019 and demonstrates adoption of recognized security practices under Public Law 116-321.

Delivery of Accurate and Complete Program Deliverables

Performance Measure: Clearwater provides all required deliverables, including the fully populated Clearwater IRM Analysis software, draft and final findings report, and remediation planning support material.

- Outcome: Every year since 2019, BWell has received a complete and actionable security risk assessment.

Timely Execution of Site Visits and SME Engagement

Performance Measure: Clearwater completes on-site visits, SME interviews, and follow-up reviews in alignment with the approved project schedule, typically within two to three business days.

- Outcome: Every year since 2019, BWell has received an accurate evaluation of administrative, physical, and technical security controls.

Evaluation of All In-Scope Information Assets

Performance Measure: Clearwater will analyze all twelve designated information assets each program year and ensures each is fully documented and risk-rated within the IRM Analysis software.

- Outcome: Every year since 2019, BWell has received a comprehensive and consistent risk profile across systems that create, receive, maintain, or transmit PHI.

County Staff Training and Knowledge Transfer

Performance Measure: Clearwater to provide ongoing training to Behavioral Wellness staff on the IRM Analysis software and Program processes, with at least 90% of designated staff completing the training.

- Outcome: Every year since 2019, at least 90% of appropriate BWell IT staff have completed the Clearwater software and process training.

Fiscal and Facilities Impacts:

Budgeted: Yes

Fiscal Analysis:

Funding Source	FY 2025-26	FY 2026-27	FY 2027-28	Total
General Fund				
State	\$53,333	\$53,333	\$53,332	\$159,998
Federal	\$53,333	\$53,333	\$53,332	\$159,998
Fees				
[Other Source]				
Total	\$106,666	\$106,666	\$106,664	\$319,996

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 Adopted Budget. Funding for FY 2026-27 and FY 2027-28 will be included in their respective recommended budgets.

Special Instructions:

Please email one (1) complete signed Amendment and one (1) Minute Order to Chris Shorb at cshorb@sbcwell.org and the BWell Contracts Division at bwellcontractsstaff@sbcwell.org.

Attachments:

Attachment A – Clearwater FY 2025-28 (BC24303) AM1

Attachment B – Clearwater FY 2025-28 (BC24303)

Contact Information:

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Contract Analyst
cshorb@sbcwell.org