

DC HIE Consent Management Solution Project

What is it?

CRISP DC partnered with the District of Columbia Department of Health Care Finance (DHCF) to develop a comprehensive, open-source consent management solution to enable compliant electronic exchange of behavioral health information, including substance use disorder (SUD) data protected by 42 CFR Part II, through the District of Columbia Health Information Exchange (DC HIE). Based on a patient's authorization, this data is shared with treating providers through the DC HIE. CRISP DC piloted the configurable electronic consent management tool to initial user groups over the last year and is prepared to make this tool available to all clinical CRISP users by July 2022.

What key features are now available in the consent tool?

- Easy integration into existing workflows and clinical systems
- Electronic signatures for patients to *opt-in* to sharing their 42 CFR Part 2 protected data
- Attestation button allowing providers to register patient's consent that has been captured outside of the tool, either electronically or on paper
- Flexible expiration dates for consent registration, with a default expiration date of one year from registration date
- Provider and payer specific forms with multiple patient consent options to share all of their SUD treatment data (treatment plan, medications, lab results, clinical notes) or only the care team's contact information

View of consent tool in CRISP:

The screenshot displays the CRISP DC interface for the consent tool. The top navigation bar includes 'CRISP DC', 'Consent', and 'Consent History'. The main content area is divided into three sections:

- Identity Validation and Education Attestation:** Contains two checkboxes for attestation: 'Provider Patient Identity Verification' and 'Provider Patient Education Attestation'.
- Signature and Submission:** Includes a checkbox for 'Check Here if you are the patient's Legal Guardian, Parent, or Legally Authorized Representative'. Below this is a 'Patient Signature' section with a text area for the signature and a dashed line indicating where to sign. A large 'X' is visible over the signature area.
- Attestation for Consent on File:** Contains a checkbox for 'I hereby attest that I have obtained WRITTEN and SIGNED consent from this patient and will retain in my records. I will make this consent available to CRISP Privacy and Security upon request.'

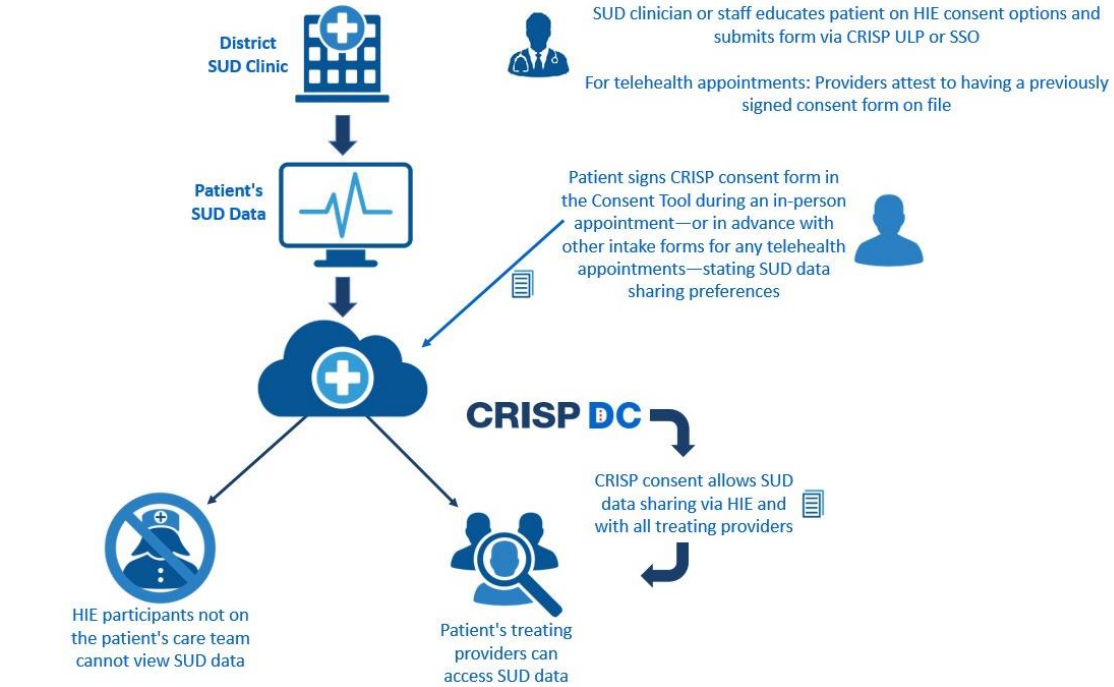
The interface also features a 'Next' button in the top right corner and an 'OR' separator between the signature and attestation sections.

How will providers access and use the tool to document consent?

- Providers can access the consent tool through the CRISP Unified Landing Page (ULP) or through single sign-on (SSO) in their EHR with the InContext app
- Providers will have the option to register a new consent or search for an existing consent on file for their patient

- There are two forms to document patient consent for Part II data sharing (provider or payer) and a consent history log
- Patients will indicate their consent preferences and will either electronically sign the consent form or submit an additional paper form for telehealth visits, with the option to revoke their consent at any time
- Providers must attest to providing patient education and verifying patient identity before registering consent
- Information on SUD data flow from providers to the DC HIE is illustrated in the below diagram

SUD Data Flow from Providers to DC HIE:



SUD care team and treating providers can access consent history, contact information, and clinical data according to patient preference

Please note: Consent to share SUD information can be updated or revoked at any time

What information can be shared and who has access to it?

- District SUD providers who have executed a qualified service organization agreement (QSOA) with CRISP DC will share SUD data with the DC HIE
- CRISP DC will only share SUD information once a patient has registered consent via the CRISP tool
- All SUD data displayed in CRISP will be accompanied by a notice that SUD information cannot be redisclosed in accordance with Part II requirements

To learn more about the tool, please reach out to corrine.jimenez@crisphealth.org.

This project is supported by the Centers for Medicare and Medicaid Services (CMS) of the U.S. Department of Health and Human Services (HHS) as part of a financial assistance award totaling \$4,616,075.00 with 100 percent funded by CMS/HHS. The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by CMS/HHS, or the U.S. Government.