CRISP DC Consent Tool Updates: Key Changes and Action Steps for Compliance

Overview: The CRISP DC Consent Tool is being updated to align with the new 42 CFR Part 2 regulations. These changes are critical for organizations handling Substance Use Disorder (SUD) data, ensuring that patient privacy is protected while enabling effective healthcare delivery.

Key Changes to 42 CFR Part 2 Regulations

1. **Patient Consent**:
   - Patients can now sign a single indefinite consent without designation for future uses and disclosures for Treatment, Payment, and Operations (TPO).
2. **Redisclosures**:
   - Collaborating providers can redisclose records in line with HIPAA.

Act NOW! What You Need to Do:

NOW through Sep. 30, 2024

1. Update Notice of Privacy Practices (NPP) and Sign CRISP DC NPP Attestation

- **Why**: The NPP explains how your organization uses, discloses, and protects patient information, including SUD data.
- **Action**: Use the updated NPP language provided by CRISP DC to modify your organization's NPP to reflect the new rules under 42 CFR Part 2. Once your NPP is updated, contact eHealthDC at contact@e-healthdc.org to receive the NPP Attestation for signature via Adobe Sign.

2. Complete and Sign Qualified Service Organization Agreement (QSOA) Addendum

- **Why**: The QSOA is essential for organizations that share SUD data with CRISP DC. It ensures that your organization's agreements with CRISP DC reflect your participation in HIE data sharing as a 42CFR Part 2 covered organization.
- **Action**: To continue sharing 42 CFR Part 2 data, complete and sign the new QSOA addendum provided by CRISP DC via Adobe Sign.

Beginning Oct. 1, 2024

3. Reconsent Patients

- **Why**: The updated consent form ensures patients are aware of how their SUD data will be shared and protected under the new regulations.
- **Action**: Reconsent patients that completed SUD consent forms prior to October 1, 2024. If these patients have not completed a new consent form by January 6, 2025, their 42 CFR Part 2 data will no longer be shared in the HIE.

Integrate Consent into Your Office Workflows:

Integrating the updated consent process into your workflow is crucial for compliance and efficient operations. Ensure all team members are trained on the new consent procedures and understand the importance of obtaining patient consent under the new regulations. Listed below are some recommended options for integrating consent into your workflow.

Integrate Consent into Your Intake/Front Desk Consent Workflow:

Integrate Consent into Your Patient Visit Workflow:

Need Help?

For any questions regarding these updates, the CRISP DC Consent Tool, or the new 42 CFR Part 2 regulations, please contact the CRISP DC Outreach Team at dcoutreach@crisphealth.org.