CRISP Consent Management Solution

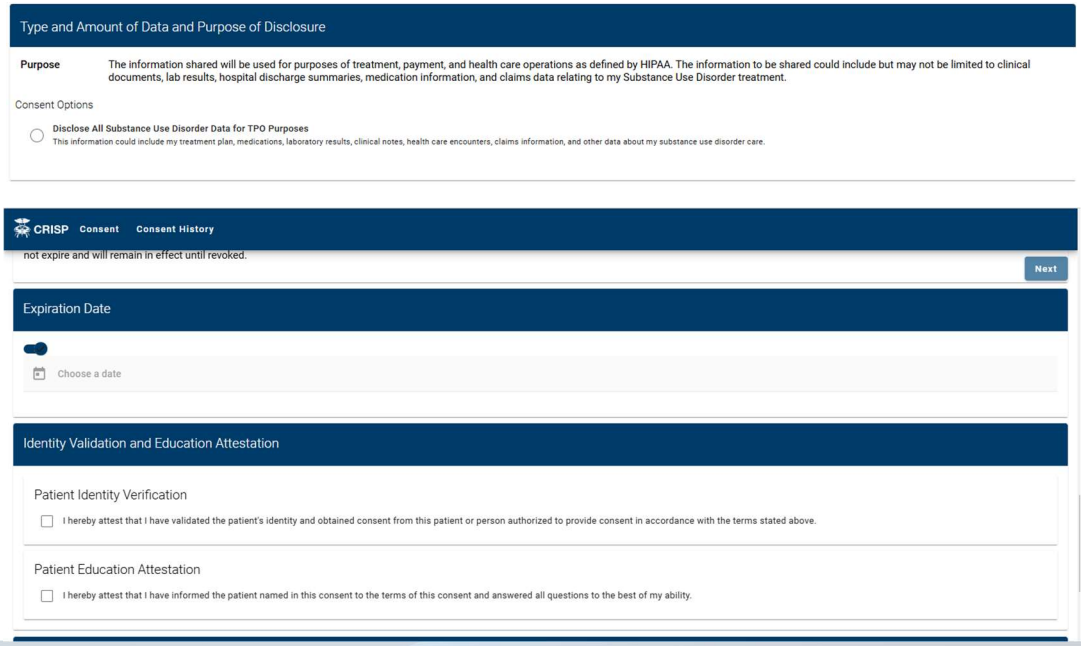
What is the Consent Tool?

This tool enables the affirmative consent registration for distinct data types. This tool aims to improve care coordination between SUD and other health care providers, to strengthen continuity of care for patients throughout SUD treatment levels, and ease workflow burden when obtaining consent and disclosing information. In future iterations, CSS will leverage this tool to allow for additional granular consent registrations based on federal and state regulations.

What key features are now available in the Consent Tool?

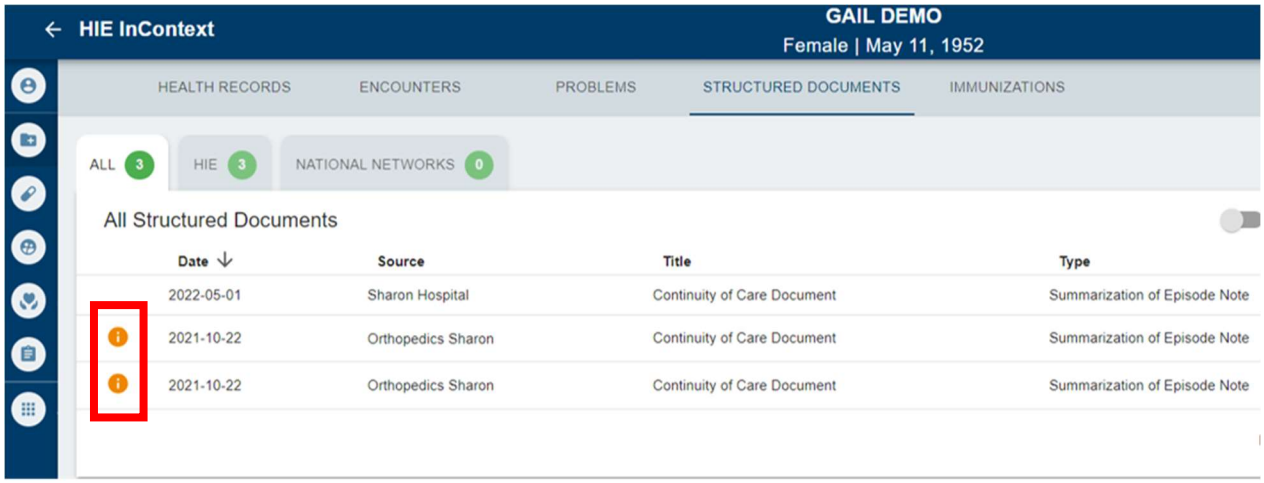
- Easy integration into existing workflows and clinical systems
- Electronic signatures for patients to opt-in to sharing their 42 CFR Part 2 protected data
- Attestation functionality allowing providers to register consent within the tool for their patients who have a signed paper consent form.
- Flexible expiration dates for consent registration. The patient can choose an expiration date or can choose to have the consent not expire, which would mean it would be active until it was revoked by the patient.
- Provider form that allows patients to share their 42 CFR Part 2 covered data for the purposes of treatment, payment, and healthcare operations.
- Patients may submit a separate Part 2 consent form outside of the HIE portal as well.

View of the Consent Tool:



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

- Providers can access the consent tool through the HIE Portal or through SSO via InContext application in their EHR
- Providers have the option to register a new consent or search for an existing consent on file for their patient, in the consent history tab
- Patients can either electronically sign the consent form or a provider can submit an additional paper form with the documented consent, with the option for the patient to revoke their consent at any time
- Providers must attest to providing patient education and verifying patient identify before registering consent
- Once consent is submitted, users will be able to easily identify data covered by 42 CFR Part 2 within the CRISP Portal by an orange 'i', as displayed below.



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

- District SUD providers who fall under 42 CFR Part 2 and wish to share their data with CRISP will be required to submit a qualified service organization agreement (QSOA) with CRISP to enable sharing of 42 CFR Part 2 protected data.
- If a consent form has previously been registered under the old consent form, allowing sharing for only treatment purposes, patients will need to be re-consented with the new form, allowing sharing for treatment, payment, and healthcare operations purposes to allow for their SUD data to continue to be shared through the HIE after December 2024.
- New forms must be submitted for any patients who have a currently active Part 2 consent form on file, should they wish to continue sharing this data after December 2024.
- All SUD data displayed in CRISP will be accompanied by a notice that SUD covered data can only be redisclosed according to applicable law.

What should I know about Part 2 data?

The **QSOA (Qualified Service Organization Agreement)** is signed by the site, not the patient.

- Patients provide their Part 2 consent through the consent tool, which takes effect only after the site has submitted a QSOA contract.
- This distinction is critical for ensuring accurate communication and recommendations to affiliates.
- Reproductive rights data is NOT included in Part 2 data.

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