

Exchanging Behavioral Health Data

Health Information Exchange Perspective

Current State

- CRISP is onboarding behavioral health organizations onto existing CRISP services
 - Encounter Notification Service (ENS)
 - Portal
 - Reporting
- ENS requires a patient panel to deliver notifications
 - QSOA required
- Receiving data from mixed-use facilities (ADTs, CCDAs)
 - Not receiving Part 2 data
- Exploring Consent2Share and potential for exchanging Part 2 data
 - Waiting on Maryland regulatory changes to allow for data exchange through the HIE
- In DC, getting all Medicaid claims data and filtering Part 2 data

Working with Behavioral Health Data is Challenging

- Nuances of the data:
 - Patient-reported data can be documented and redisclosed under HIPAA, but if two organizations share data with patient's prior consent, you cannot redisclose to others.
 - Can capture SUD data from non-part 2 entities
 - Can capture relationship between orgs if mixed facility and program not disclosed that would identify the patient in treatment.
 - Mixed facilities sharing non-Part 2 data challenges

Policies Adopted – BH Data Exchange

- The organization makes the determination of Part 2 coverage (not CRISP)
- For now, mixed facilities that want to send data must block sending Part 2 data
- Sites onboarded to CRISP in any capacity must fill out:
 - Checklist geared toward identifying if Part 2 covered
 - Attestation of data submitted to CRISP
 - Signed QSOA (if applicable)

Lessons Learned

- CRISP is a foreign concept to behavioral health community
- Challenges knowing which organizations fall under Part 2
 - Each organization interprets Part 2 differently
 - Want proper data protections but do not want unnecessary agreements
- Policy considerations
 - Maryland regulation
 - Alignment of organizational structures with existing CRISP access policies (delegation)
- Technology considerations
 - Consent2Share nuances: dependent on NPIs, single to & from provider selection, redactions uses code set (need to maintain), no nationally endorsed SUD code set
 - Designing CRISP portal - ease of workflow & privacy
 - Minimum necessary for storing & serving up data
 - Redundancy of data privacy
 - Balance of limiting access to non-SUD data versus safeguarding data
 - Technology-based options (over-engineering?)