# Electronic Consent Management (ECM) in Washington State

The Sequoia Project: Interoperability Matters Privacy and Consent Workgroup 10/2024





# Angela Teslyuk

- Health Care Data

  Analyst
- Clinical Quality and CareTransformation Division

### **Our Team**







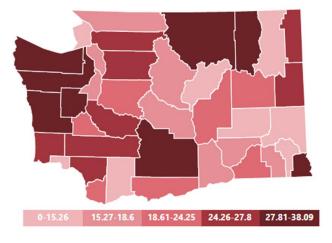


Health Care Authority Code Smart (Vendor) Midato Health (*Vendor*) Integrated
Solutions
Group
(QA)



# **Initiative Background**

- Improve patient care coordination via information exchange
- Washington State opioid crisis response
  - ▶ 68% of drug overdose deaths in WA involved an opioid
- Inconsistent interpretations and implementations of regulations
- Element of Washington state's tech modernization framework



Age-Adjusted Rate of All Drug and Opioid Overdose Deaths per 100,000 Population, 2018-2022 <sup>1</sup>



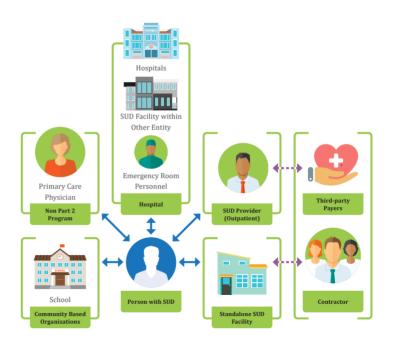
### **Objectives**

- Deploy a solution that:
  - ► Facilitates patient-authorized exchange of sensitive data.
  - ► Is scalable, secure, sustainable, and meets provider needs.
- Improve the exchange of substance use disorder (SUD) data
- Reduce administrative burden related to consents





### Framework & Approach



- Purposeful change management approach: "Meet providers where they are at"
  - Offer basic functionality: create, manage, revoke consents
- Educate & engage end users
  - Rooted in human-centered design methodology
- Gradual improvement and refactoring approach



### **Essential Technology**

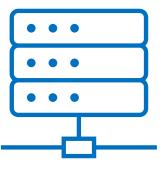
- FHIR standard implementation promotes interoperability with existing systems
- Flexible & scalable architecture
  - ► Accommodates future State business
- Prioritization of privacy, security, & compliance
  - ➤ Office of Cybersecurity (OCS) Security Design Review (SDR)
  - ► SOC2 Type 1 & Type 2 Certification
- Offers system observability tools





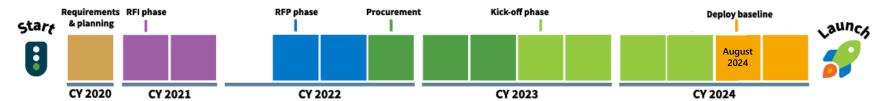
### **System Features**

- **OCR** scanning
- Consent expiration reporting & other analytics
- Secure crossorganizational access
- Customizing role-based access
- Multi-language support





# **Project Timeline**



### Recent timeline milestones

- 1 ECM Vendor announced: Q1 2023
- 2 Deployment Kickoff with Vendor: Q3 2023
- 3 Go Live with Baseline Solution Q3 2024
- Expanded Solution deployment: after Q3 2024

## Phase One Implementation



### Acronyms ECM Electronic Consent Management

HR Electronic Health Records System

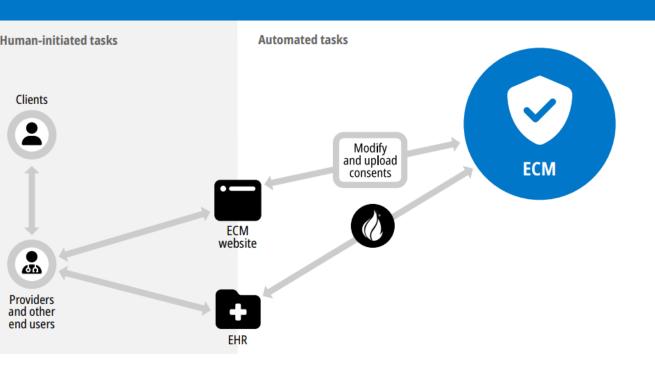
FHIR Fast Healthcare Interoperability Resources

### Key

HL7® FHIR®

#### Notes

**Public information:** Public information is information that can be or currently is released to the public. It does not need protection from unauthorized disclosure, but does need integrity and availability protection. Category of data: 1.





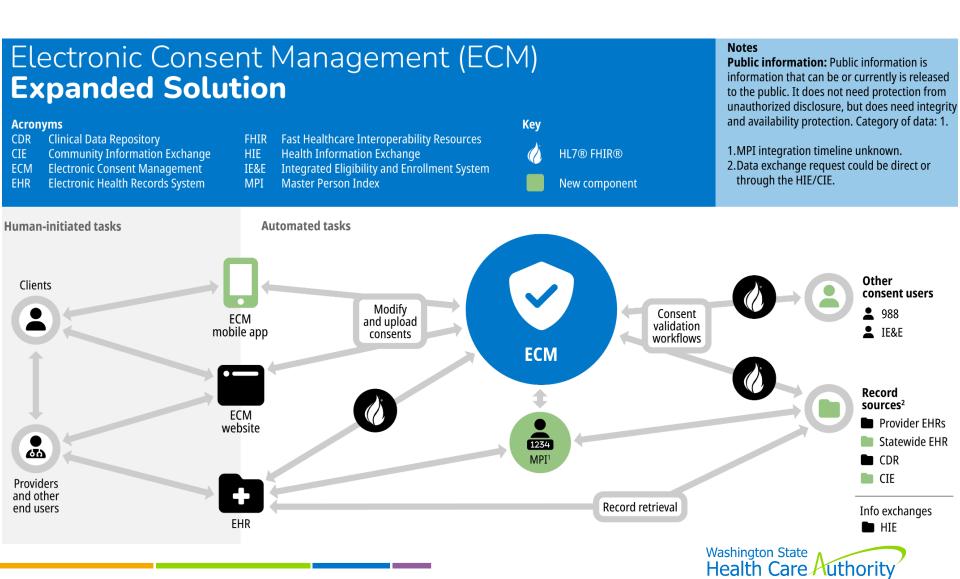
### **Anticipated Future State**

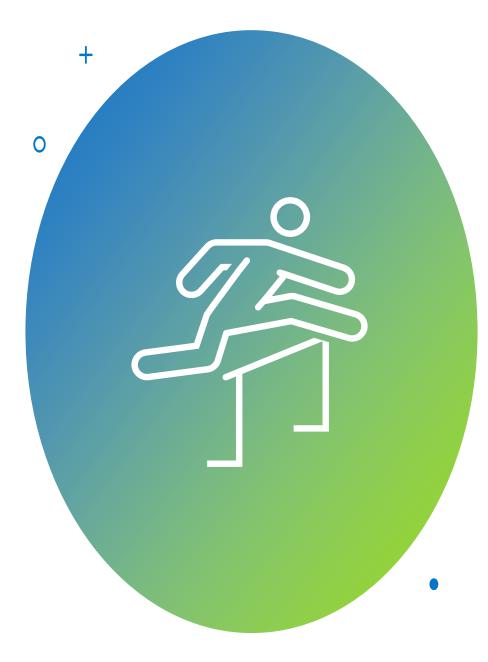
- Transform the user navigation experience
  - Automated record exchanges authorized by patients
  - Automate enrolment in state offered services
- Platform enabled transformation with modularized components
- Support future State business needs





# Phase Two Implementation





# Challenges

- New technology, many unknowns
- Existing consent functionality within native EHR's
- Small vendor marketplace
- Voluntary system
- No standard consent form in WA
- New Part 2 Final Rule

### Resources

- Contact Us!
  - ► <u>Angela.Teslyuk@hca.wa.gov</u>
  - econsent@hca.wa.gov
- Resources
  - ► ECM webpage
    - > Factsheet
    - > FAQ
  - ► <u>Substance Use Disorder</u> Information Guide
  - ► HCA's technology initiatives
  - <u>ECM email listserv</u> (<u>GovDelivery</u>)

# What is Electronic Consent Management?



Electronic consent management (ECM) is a cloud-based software solution which will house consents to share sensitive data (e.g. substance use disorder, research, sexually transmitted infection data). It is not intended to store HIPAA general consents for treatment. ECM will be free to use and is meant to replace paper-based consents or integrate with current electronic consent practices by enabling data exchange that will be compliant with 42 CFR Part 2 and other relevant statutes.

If you are interested in learning more or using the system, contact HCA at econsent@hca.wa.gov.

#### → What data will be collected?

Health records will not be stored by HCA or the ECM vendor. The system will only store consents to share data, which can be updated or revoked as needed.

### Why is this happening?

Providers face significant administrative challenges managing consents due to time and cost. ECM will foster more complete and coordinated care.

### Who does it affect?

HCA will focus on storing consents to enable Substance Use Disorder (SUD) data exchange first. Behavioral health providers and others that serve SUD clients or exchange SUD data will benefit. In future project phases, consents to exchange other types of sensitive data will be added. HCA is prioritizing data exchange for Apple Health (Medicaid) clients. ECM is one of HCA's Tech Modernization projects.

### How does this benefit me as a medical provider or health organization?

Main benefits of the ECM solution for providers and other organizations include:

- Access to client data in times of crisis which is crucial to address substance use disorder (SUD) issues.
- A reduction in provider administrative burden related to consent.
- A reduction in the number of incomplete, noncompliant, and redundant consents.
- Fewer barriers for those who provide vital services to Washington's most vulnerable residents
- Access to a consent solution that will be adaptable and sustainable, yet flexible throughout its lifespan.
- A decrease in the time it takes to share relevant information between providers.

