# Authorization to Share Confidential Member Information (ASCMI) Tools Overview



## **ASCMI Design Overview**

## **ASCMI Initiative**

# The ASCMI (pronounced "ask me") initiative seeks to promote coordinated, person-centered care for all Californians by streamlining consent to share HSSI.

#### The Issue

Broad and secure access to HSSI is limited, in part, by:

- » Complex privacy rules governing consent and data exchange
- Outdated technology and use of paper forms
- » Fragmented and incomplete HSSI exchange ecosystem

Source: Why California Needs Better Data Exchange (CHCF)

### The ASCMI Approach

Care partners can use standardized tools for obtaining a Client's consent to share data, and store that consent record in a secure database that other Care Partners can access.





ASCMI Form describes what information a Client agrees (or does not want) to have shared about them and how it may be shared and used with other partners





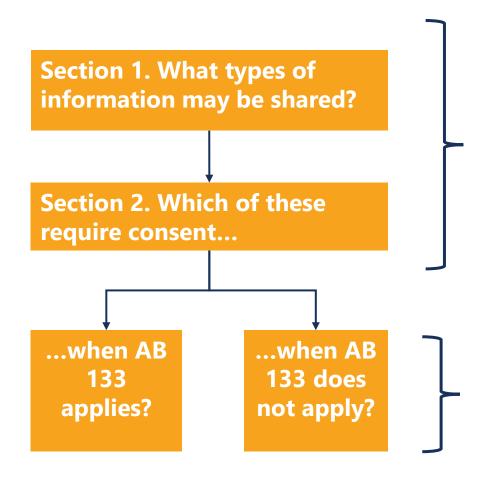
Consent
Management
Platform stores and
manages Clients'
consent preferences
electronically





Care Partners (e.g., health plans, providers) access and update Clients' consent preferences via the consent management service

## **ASCMI Form Overview**



### Why is the Form divided into two sections?

- ✓ Clearly delineate the types of information that can be shared without consent versus what types of information require consent to share (e.g., Part 2 information)
- ✓ Clarify why consent is not always required for data sharing.
- Only request consent when it is required
- Reinforce messaging that choosing to not sign the form will not impact access to services

## Who does AB 133 apply to?

- 1. Individuals enrolled in a Medi-Cal managed care plan;
- 2. Individuals receiving behavioral health services under Medi-Cal; and
- 3. Individuals involved in the criminal-legal system that qualify for pre-release Medi-Cal benefits.

California Assembly Bill (AB) 133

**Assembly Bill (AB) 133,** enacted in July 2021, limits the application of certain state privacy laws so that information can be shared more easily in order to coordinate care. See <u>CalAIM Data Sharing Authorization Guidance (October 2023)</u> for more information

## **ASCMI Form Proposed Outline and Use Cases**

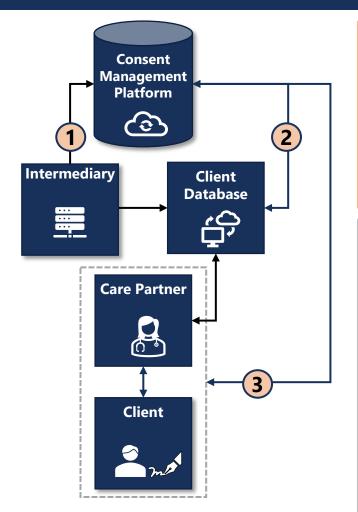
#### What types of information may be shared?

- Medical, mental health, and substance use disorder (SUD) status and treatment information
- » Health insurance information
- » Housing and income status, history, and supports
- » Limited criminal legal information, including booking data, dates and location of incarceration, and parole status
- » Individualized Education Programs, and other information about health and social services provided in schools.

Which types of information require consent?	AB 133	Non-AB 133
» SUD information protected by 42 CFR Part 2	✓	✓
» Housing-related personal information when sharing with HMIS	✓	✓
» Mental health treatment information protected by Lanterman-Petris-Short Act (LPS)		✓
» Some medical information (HIV test results, genetic testing)		✓

## **Consent Management Service Overview**

DHCS proposes launching a Consent Management Platform (CMP) that would include a statewide repository to store consent records and is exploring how QHIOs and other Intermediaries could facilitate Care Partners' access to the CMP.



#### **Potential Pathways to Access CMP**

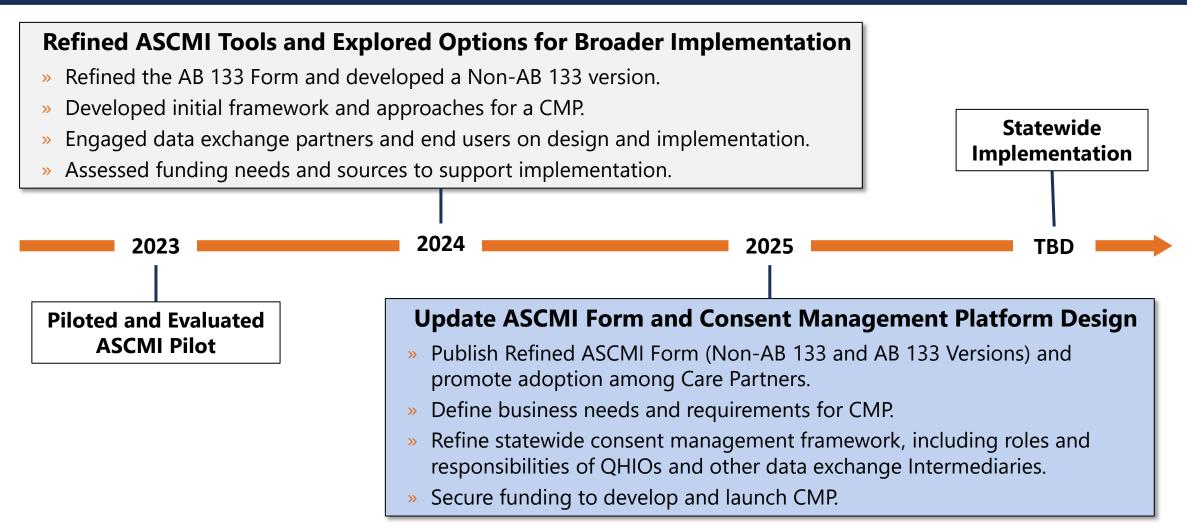
- 1) Intermediary Integration: Care Partner is connected to an Intermediary which facilitates the exchange of consent information between Care Partner and CMP
- **2) Care Partner Integration:** Care Partner is connected directly to CMP via API with client database (e.g., EHR)
- **3) Portal**: Care Partners and/or their Clients can access the CMP via a portal to update consent preferences

#### **Key Terms**

- Consent Management Platform (CMP) would be a central database that stores the consent records of Clients
- Intermediaries, such as Qualified Health Information Organizations (QHIOs), other health information exchanges (HIEs), and community information exchanges (CIEs), would collect, transform, and send consent information from Care Partners to CMP; query CMP for a Client's consent preference sand facilitate the exchange of protected HSSI where a Client has provided consent to share data
- Care Partners: Organizations providing health care or social services to a Client, including behavioral health delivery systems; managed care plans with whom a Client is enrolled; and state and county agencies including housing, reentry, and other providers.
- » Clients: An individual who signs the ASCMI Form. They may or may not be a Medi-Cal Member.

## **Recap and Preview of Activities in 2025**

DHCS will seek broader input on the design of ASCMI Tools to inform implementation and support needs and requirements.



## **2023 ASCMI Pilot**

## 2023 ASCMI Pilot in Medi-Cal

DHCS launched 3 pilot sites (San Diego, San Joaquin, and Santa Cruz) in 2023 to test receptivity and interest in the ASCMI tools and solicit feedback from pilot participants.

#### **ASCMI Pilot Overview**

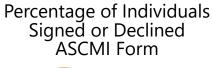
- » Each pilot group consisted of:
  - » Health information exchange/community information exchange (HIE/CIE)
  - » Medi-Cal managed care plan
  - » County agencies (including behavioral health)
  - » Health and social services providers
- » All pilot sites used the standardized ASCMI Form but developed a local consent management service
- The HIE/CIE served as the pilot lead in each county. Responsibilities included:
  - Recruiting, training, and providing technical assistance to other pilot participants
  - Building, launching, and operating the consent management service
  - Fulfilling all administrative and management functions

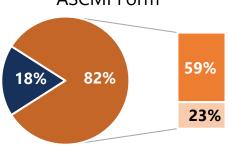


## **ASCMI Pilot Outcomes and Findings**

The Pilot validated receptivity by Medi-Cal Members and interest by Medi-Cal Partners in the ASCMI tools.

#### **Pilot Outcomes**





Out of 310 Members asked to sign the form		
18%	Declined to sign the Form	
59%	Agreed to full disclosure of their personal information <b>including</b> SUD information	
23%	Agreed to disclosure of their personal information, <b>excluding</b> SUD information	

Due to time constraints, Pilot sites only collected signatures and did not use the ASCMI Form to authorize data sharing

#### **Long-Term Interest in Pilot Tools**

- » 82% of MCPs and county agencies supported a broader rollout of the ASCMI tools
- >> 53% of providers found the ASCMI Form helpful and that it improved their organization's consent management process\*
- >> 59% of providers found the consent management service helpful\*

\*All other providers were neutral. No providers found the ASCMI Form or consent management service to not be helpful. See <u>ASCMI Pilot Evaluation</u> <u>Report</u> for more information.



"Having a standardized consent and standardized process **approved at the state level** for use and access would decrease administrative burden and improve timely access across the continuum of care... We can focus more on meeting the needs and overall health and well-being of [Medi-Cal Members]." – Provider, San Diego Pilot

