

Consent Management Utility Opt-Out – Bulk MFT Solution

Overview: Patients can opt out of data sharing in Maryland HIEs. Per regulation, patients should be able to submit a single opt out request that is shared across all Maryland HIEs, removing the need for patients to submit opt out requests to each Maryland HIE. CSS will serve as the Consent Management Utility and share opt out requests with other Maryland HIEs.

Bulk MFT Option Summary: Maryland HIEs who chose to use the Bulk MFT solution will send daily CSV files of opted out patients to CSS via MFT, receive feedback on the success of those submitted opt out requests, and receive daily CSV files on all patients opted out across Maryland HIEs via MFT.

Bulk MFT Option Detailed Steps and requirements:

- HIE inform CSS of interest in Bulk MFT Solution and CSS works with HIE to set up MFT – see below for MFT Set up
- File from HIE to CSS
 - HIEs utilizing the bulk MFT solution will submit daily CSV files to CSS of MD patients who have newly opted out of the HIE into the appropriate 'Incoming' MFT folder for that HIE. The file must be a CSV file matching the file naming conventions (see file naming convention section below), MFT guidelines, and field requirements in the data dictionary.
 - CSS will create new records for successfully opted out patients in the CSS opt out database. The opt out records will be based on patient demographics, not the submitting source/mrn.
 - At this time, CSS does not support revoking opt outs as part of the Consent Management Utility Opt-Out Bulk MFT solution. If patients would like to opt back in, they must call the CRISP support number and each HIE.
- Exception File from CSS to HIE:
 - After submission, submitting HIEs will receive a CSV exception file indicating whether each opt out request succeeded or failed. If the opt out request was successful, the row will include the CSS Opt Out

Identifier. If the opt out request failed, the row will include the failure reason. Potential failure reasons include rows missing required fields such as date of birth.

- If an HIE resubmits the same patient but with different demographics, another record will be generated in the CSS opt out database. If an HIE resubmits the same record for the same patient, it will fail to write and return as 'already opted out'.
- CSS will send an email notification when the exception file is ready for pickup from MFT.
- File from CSS to HIE:
 - Upon onboarding, HIEs utilizing the bulk MFT solution will receive a one-time historical file of all patients that have opted out of Maryland HIEs in CSS's opt out database (historical)
 - Following the one-time historical file, HIEs will receive daily delta files of patients that have newly opted out of Maryland HIEs in CSS's opt out database (daily).
 - Note: To support appropriate logging and varying demographics across HIEs, outgoing files may include the same patient/CSS opt out identifier more than once.
 - Opt-out reversals will be sent outbound from CSS to the HIE. CSS will not be receiving opt-out reversals from HIE's at this time.

MFT Set-Up:

- CSS will set up a separate 'Incoming' and 'Outgoing' folder for each HIE
 - The Incoming folder will be used for placing the file sent from the HIE to CSS.
 - The Outgoing folder will be used for placing the Exception file and the file from CSS to the HIE.
- Each HIE will have the option of using an individual or service account to access the CSS MFT.
 - The individual account is for the access of one person and is used with an individual's email address.
 - The service account is usually associated with a distribution list so that more than one person will receive notification when the file is ready

for pickup. The service account can also be automated. The service account lasts for one year with the password option.

File Naming Convention:

- File from HIE to CSS: '{HIE_Name}_Consent_Opt_Out_MMDDYYYY.csv'
- Exception File from CSS to HIE:
'{HIE_Name}_Consent_Opt_Out_Exceptions_MMDDYYYY.csv'
- File from CSS to HIE's:
 - Historical file: 'Bulk_Consent_Opt_Out_Historical_MMDDYYYY.csv'
 - Daily file: 'Bulk_Consent_Opt_Out_MMDDYYYY.csv'

Audit Logs:

- CSS will maintain copies of the files sent by HIEs to enable auditing if necessary