Implementing 42 CFR Part 2 – Technical Solutions

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Data Segmentation

What is data segmentation?

The process of sequestering from capture, access or view certain data elements that are perceived by a legal entity, institution, organization, or individual as being undesirable to share.
How Does It Work

• Client signs a consent (Patient Consent Directive) limiting disclosure of substance abuse data to only his/her treating provider.

• Agency has a CCD-A that includes both mental health and substance abuse data

• Agency is referring client to another provider what are they permitted to send?
What should the agency do?

- Use HL7 data segmentation together with the CCD-A… but what is HL7

- HL7 is a set of standards, formats and definitions for exchanging and developing electronic health records (EHRs).

- HL7 provides the framework for the CCD-A and the data segmentation in support of protection of data against unconsented sharing.
The technical solution applies security labels to a health record (such as C-CDA – Consolidated-Clinical Data Architecture).

Data may be tagged at the document-level, section-level or individual data element-level.

- Is there consent for the C-CDA (document level)?
- Is there consent for the Substance Abuse data (section level)?
- Is there consent to share a specific diagnosis such as AIDS (element level)?

The C-CDA must include the data sharing restrictions.
Is That Our Only Choice?

- **Consent2Share**
  - Increase the inclusion of behavioral health data in HIE
  - Joint project between SAMHSA and ONC
  - Patient Portal where patients can learn about and manage consent options
  - Alternative is to integrate into existing EHRs
Consent2Share - Technical Design
Maybe This is Easier
Questions