

SAPC Release of Information (ROI) FAQ

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General Questions (not ROI specific)

| General Questions | Answer |
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| Where are the new paper ROI forms located? | <p>The three (3) ROIs are available on the SAPC website in the Manuals, Bulletins, and Forms section under the Clinical Tab.</p> <ul style="list-style-type: none"> • SAPC Payment and Operations ROI • SAPC Treatment and Care Coordination ROI • SAPC Legal Proceedings ROI |
| Can verbal consent be accepted? | <p>42 CFR Part 2 Final Rule indicates that <i>written consent is required</i> to disclose information unless otherwise specified in Subpart D (Uses and Disclosures Without Patient Consent) and Subpart E (Court Orders Authorizing Use and Disclosure).</p> <p>Written consent may be provided with a wet signature or electronic signature. Electronic signatures must comply with the State of California Government Code section 16.5. For examples of different ways that electronic signatures can be documented, please review the State General Services Manual on Electronic Signatures.</p> <p>Disclosures made when there is only verbal consent is in violation of the 42 CFR Part 2 Final Rule.</p> |

| General Questions | Answer |
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| When do the updated ROI forms go into effect? | <p>All existing and new clients will need Final Rule compliant ROIs completed via electronic signature in Sage or via upload to their ProviderConnect NX (PCNX) record via Provider File Attach prior to disclosure of information and billing.</p> <ul style="list-style-type: none"> • For Primary Sage Users the effective date is 8/1/2026. • For Secondary Sage Users the effective date is 9/1/2026. |
| If a client has an existing ROI, do we need to have them sign a new ROI? | <p>Yes, all currently active and new clients will need a new Final Rule compliant ROI completed and uploaded to their PCNX record effective 8/1/2026 for Primary Sage users and 9/1/2026 for Secondary Sage Users before disclosing any health information, including for payments, care coordination or legal proceedings.</p> <p>This includes disclosing information for individuals for substance use disorder diagnostic, treatment, or referral for treatment services.</p> |
| Do clients need to sign all three (3) ROIs? | <p>No. A signed ROI is only needed for the disclosure of information.</p> <p>Generally, this will require all clients receiving treatment services to have a SAPC Payment and Operations ROI on record for billing purposes.</p> <p>However, if a client does not want information shared with other SAPC providers or outside entities then the SAPC Treatment and Care Coordination ROI and SAPC Legal Proceedings ROI are not required.</p> |
| What is the process for a client to request their own records? | <p>For documentation purposes, SAPC recommends providers use the SAPC Treatment and Care Coordination ROI. Check off Outside SAPC's Provider Network in section II, then enter the client's information in the entity information.</p> |
| Can providers add additional fields for internal use (i.e. staff name) to the ROI forms? | <p>No. SAPC ROIs should not be modified except for checking off check boxes and/or entering entity information.</p> |

| General Questions | Answer |
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| <p>What do we do if a client does not want to sign an ROI?</p> | <p>Written consent is required for the disclosure of client information. It is the responsibility of the provider to explain the purpose and limitations of how information will be disclosed if written consent is granted.</p> <p>Signing the ROI for Payment and Operations is a prerequisite for clients to be able to have their MCAL Insurance cover the cost of treatment. If a client does not want to sign the ROI for Payment and Operations, agencies are not expected to serve those individuals, unless they have other (non-SAPC) funding to support the non-reimbursable services delivered to the client.</p> |
| <p>Is a new ROI required if a client changes LOC?</p> | <p>ROIs are tied to the Agency and not a specific site location. If there is an active ROI, it remains active if the client transitions to a different LOC and/or different site location within the same agency.</p> <p>If a client transfers to a different agency, then new ROIs for Treatment and Care Coordination and/or Legal Proceedings may be needed if there are none on record. A Sage ROI for Payment and Operations is non-episodic; therefore, it is valid across agencies.</p> |
| <p>Don't ROIs require an Expiration Date?</p> | <p>Per the Final Rule, 42 CFR 2.31(a)(7) an expiration date or expiration event must be identified. SAPC's ROI's identify the expiration event as: "This authorization will remain in effect for as long as you receive services from the SAPC Provider Network unless you choose to revoke it."</p> |
| <p>Does a client have to renew the ROI if they stay in treatment for over 1 year?</p> | <p>No. If there is an active ROI(s) on file then it does not need to be renewed as it is valid until the expiration event or at revocation.</p> |
| <p>Do the ROIs expire if there is no revocation date?</p> | <p>The SAPC Payment and Operations ROI does not expire unless revoked.</p> <p>The SAPC Treatment and Care Coordination ROI and SAPC Legal Proceedings ROI will expire once the client is no longer receiving services from the SAPC provider(s). If a provider receives a request after the client is discharged, a Part 2 compliant ROI should be submitted with the request of records.</p> |

| General Questions | Answer |
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| <p>If the SAPC Treatment and Care Coordination ROI expires when a client is no longer in treatment, what do we do if the client requests a copy of their records after discharge.</p> | <p>A new SAPC Treatment and Care Coordination ROI needs to be signed and will be in effect until the request is completed.</p> |
| <p>Can clients enter a future revocation date?</p> | <p>No, the client should not enter a future revocation date.</p> |
| <p>How do we proceed with phone screening and telehealth clients that cannot give wet signatures on ROIs?</p> | <p>Not having an ROI on record does not preclude a provider from conducting the screening or referring internally to one of their own site locations.</p> <p>Similar to other consents or intake paperwork, if the initial contact is telehealth, providers should get written consent at the earliest in person contact.</p> <p>Until written consent for release of information is obtained, Part 2 protected information may not be disclosed and claims should not be submitted to SAPC.</p> |
| <p>When providers get a request for records from an outside entity, should we receive an ROI along with it?</p> | <p>If the client is currently in treatment and there is a SAPC ROI on record (Treatment and Care Coordination or Legal Proceeding), then a ROI from the outside entity is not needed, but good to have on record.</p> <p>If the client has been discharged from treatment, then YES, a part 2 compliant ROI should be sent by the entity requesting records.</p> |
| <p>Can requested records be sent via secure email?</p> | <p>Consented disclosures may be sent to the receiving entity in the manner they identified. If records are sent electronically, ensure that they are sent securely as required by HIPAA and 42 CFR part 2.</p> |
| <p>Can clients submit a signed ROI(s) via mail or email?</p> | <p>Yes, a signed ROI(s) can be submitted and returned by a client by mail or email. If the client is submitting a self-request, the client should also submit a copy of valid government-issued ID with the ROI in order to confirm the requestor's identity.</p> |

| General Questions | Answer |
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| | If records are sent electronically, ensure that they are sent securely as required by HIPAA and 42 CFR part 2. |
| What if more than three (3) entities are identified on the SAPC Treatment and Care Coordination ROI and/or SAPC Legal Proceedings respectively? | <p>The Supplemental Authorized Individuals/Entities form posted to the SAPC website may be used for additional entries for the SAPC Treatment and Care Coordination ROI and SAPC Legal Proceedings ROI.</p> <p>The Supplemental Authorized Individuals/Entities form is located in the Clinical Tab of the Manuals, Bulletins, and Forms section of the SAPC website.</p> |
| Are electronic signatures acceptable on the ROIs, such as DocuSign, so that signatures may be obtained during telehealth services? | Electronic signatures are permitted to the extent that they are not prohibited by any applicable law. 42 CFR 2.31(a)(8) |
| Will the ROIs be available in a language other than English? | Yes, SAPC has released these ROIs in Spanish. Both the English and Spanish versions are available on the Network Providers>>Manuals, Bulletins, and Forms section of the SAPC website . |
| Are the ROIs part of a client's Intake Packet? | <p>Yes, it is recommended to incorporate the SAPC Payment and Operations ROI into the intake process, given that it is required for submission of payments to SAPC.</p> <p>Other ROIs should be completed when needed, but prior to disclosing information. This may be at intake but may also apply during the course in treatment.</p> |
| What happens to existing In-Network and Out-of-Network ROIs that are currently active? Are they null and void as of the new ROI effective dates? | <p>Existing active In-Network and Out-of-Network ROIs will continue to be active and will cover disclosures prior to the new ROI compliance dates</p> <ul style="list-style-type: none"> • Primary Sage Users: 8/1/2026. • Secondary Sage Users: 9/1/2026. <p>However, treatment providers should use the new SAPC ROI forms for any disclosures on or after their respective compliance dates.</p> |
| The Sage Release of Information_In Network form is locked and we can't revoke | Access was restored to the Sage Release of Information_In Network form to only allow the revocation of existing active ROIs when necessary. |

| General Questions | Answer |
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| a historical ROI, will creating a new paper ROI override the historical ROI? | |
| How can we identify if an ROI is compliant? | Providers are responsible for being aware of the consent requirements as outlined in 42 CFR Part 2, §2.31. To simplify the process and ensure network compliance, SAPC created Part 2 compliant ROIs for the SAPC Provider Network and mandated their use by the SAPC treatment network. |
| How do these ROIs work with Data Exchange Framework (DxF) and data sharing with Health Information Exchange (HIE)? | SAPC's paper ROI forms are not compatible with DxF or HIE. |
| If the provider has multiple sites, which address should be entered for filling out section "II. Entities Authorized to Share Health Information"? | Provider's may enter the site location where the client is receiving services. The authorization will extend to the entire Agency, not just the listed site. |
| Is the ROI required for verbal record disclosures or only for written record disclosures? | A ROI is required for both verbal and written disclosures. |
| Are provider staff signatures required on the paper ROI forms? | No, staff signatures are not required. However, they may serve as one of the two required witnesses if the client can only sign by mark, such as making an "X." |
| Can the Witness Signature line be used by staff to note who completed the form with the client? | <p>The purpose of the two (2) Witness Signature fields are for when the client is unable to sign and only leaves their mark.</p> <p>If agencies wish to include a staff witness signature as part of your consent process, you can use one of the 2 available lines to do so.</p> |
| When the Sage electronic forms are available will providers need to get both the electronic and paper ROIs signed? | No. Either the Sage electronic form(s) or the paper form(s) should be signed. However, completing the forms in Sage is recommended as it will allow users easier visibility on what has been completed. |

| General Questions | Answer |
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| | Providers should upload at least the ROI for Payment and Healthcare Operations using Provider File Attach if only the paper version is signed. |
| Can we add new entities to an existing ROI? | No. Once an authorization is signed, new entries should not be made as they were not effective as of the date on record. |
| What is the correct process for revoking consent to one of multiple authorized entities? | The Treatment and Care Coordination ROI and Legal Proceeding ROI both allow for multiple entries for approved entities for disclosure. If the client wants to revoke consent to one of the entities, then the entire form needs to be revoked and a new ROI needs to be completed with the authorized entities moving forward. |
| Is a verbal revocation by the client sufficient? | No. Written revocation is required. Client(s) can either mail in a revocation or complete it in person. |
| For the revocation section, should agencies replace the SAPC mailing address with their own agency contact information, or should the SAPC information remain? | <p>When revoking any of the ROIs providers should enter their site information in the "Treatment Substance Use Provider Agency's Mailing Address" fields.</p> <p>The SAPC's Mailing Address or Email Address should not be removed or edited as it is part of the SAPC approved form(s).</p> |
| Do cash and private pay clients have to sign the ROIs? | <p>A Payment and Operations ROI may not be needed if no billing is generated. However, it still may be needed for operation purposes, so it is recommended it is signed.</p> <p>If there is care coordination, then the Treatment and Care Coordination ROI will still be needed. This also applies if there is a request for legal proceedings related disclosures.</p> |
| For Juvenile dependents or wards, are DCFS or Probation entitled to the youth's records? | Youth who are dependents through DCFS or Probation are still able to consent or restrict access of their SUD records. |

Upload Questions

| Questions | Answer |
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| <p>Do all signed paper ROIs need to be uploaded to Sage?</p> | <p>All providers, Primary and Secondary Sage Users, are required to upload all paper SAPC ROIs to Sage via Provider File Attach.</p> <p>File Type: “Release of Information” Documentation Type: Specify the type of ROI. File Naming Convention: [Type of Document]-[Date (MM-DD-YY)]-[Client's First & Last Initial]-[Client ID]</p> <p>Examples:</p> <ul style="list-style-type: none"> • ROI for Payment and Operations-06-01-2026-AB-123456 • Revoke ROI for Payment and Operations-06-15-2026-AB-123456 |
| <p>When uploading a ROI and we use the comment section, who can see that?</p> | <p>The comments section of the Provider File Attach form is only visible when a specific file is selected within the form, therefore visibility is limited by a user’s logged in system code.</p> |
| <p>Do the new ROIs need to be uploaded separately from the intake packet or can then be uploaded together with the intake packet?</p> | <p>ROIs are required to be uploaded <u>individually</u> via Provider File Attach so that the File Type and Document Type clearly reflect that an ROI is on file and whether it is active vs revoked.</p> <p>The SAPC Payment and Operations ROI will specifically be reviewed by Utilization Management when reviewing Service Authorization Requests. If this is bundled into an intake packet, it may delay service authorization adjudication.</p> |
| <p>Will there be a report in PCNX to validate if the forms have been uploaded?</p> | <p>The Provider File Attach Report may be used to track uploaded files. The report may be filtered with File Type, Documentation Type, and client parameters. For the broadest scope, SAPC recommends running it by File Type: Release of Information. This will show all the Documentation Type records.</p> |

| Questions | Answer |
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| Would the uploaded ROI for Payment and Operations to PCNX be sufficient to bill? | Yes, the SAPC Payment and Operations ROI is required for billing. Uploading it allows SAPC to confirm it is there so we may bill the State. |
| What do we do with the paper forms once they are uploaded? | Follow your agency protocols regarding paper documentation. |
| What if we uploaded an ROI to the wrong File or Document Type | Open a Sage Helpdesk ticket for “Modify a Medical Record.” |

ROI for Payment and Operations Questions

| Payment and Operations Questions | Answer |
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| What happens with clients who do not sign the Payment and Operations ROI? | <p>The Final Rule requires written consent to bill for SUD treatment services, including screenings. As noted in the instructions of the form, if a client does not sign this consent they are accepting responsibility for all payments, including any amount that would otherwise be billed to or reimbursed by SAPC or third-party payers.</p> <p>Providers are responsible for making arrangements with clients at the time of admission for services rendered prior to the signed SAPC ROI for Payment and Operations.</p> <p>Once the ROI is signed, providers may bill for the previously rendered services.</p> |
| Regarding past residents, for denials that need to be rebilled that have not rebilled yet, will we no longer be able to rebill those denials after 6/1/26 without these forms? | Current and new clients are required to have new ROIs signed. Discharged clients are still under previously consented authorization. |
| How do we bill for screenings conducted by phone if the client does not show up for their intake? | Once there is a SAPC Payment and Operations ROI on file, then this will cover previous and future screenings. However, until written consent is on file, the service cannot be billed to SAPC. |

| Payment and Operations Questions | Answer |
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| Is the ROI Payment and Operations form required for Service Authorization Requests to be approved? | Yes, Utilization Management’s (UM) Care Managers will be looking for this ROI as part of the authorization review and approval process. |
| If a client revokes their consent for the Payment and Operations ROI, will providers still be able to submit billing/rebilling for past services? | Providers may continue billing services through the date of service matching the revocation date. Services rendered after the revocation date cannot be disclosed for billing purposes. Given that signing the ROI for Payment and Operations is a pre-requisite for care, agencies may decline care for clients that do not sign this form. |
| If a client refuses to sign the SAPC Payment and Operations ROI, are we required to provide services? | The “Instruction” and “How to fill out the” consent sections of the form explain the consequences of not signing. If the client does not agree to the alternative arrangement offered by the provider, then services may be refused. |
| Will we need an additional ROI for billing appeals? | No, an active SAPC Payment and Operations ROI on file is enough to address billing. |

ROI for Legal Proceedings Questions

| Legal Proceedings Questions | Answer |
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| For progress letter(s) to DCFS, lawyers, Courts, Probation officers, etc., should Treatment and Care Coordination ROI or Legal Proceeding ROI be utilized? | If the purpose of the disclosure is meant for a legal proceeding, then a SAPC Legal Proceedings ROI is required. Information disclosed under the Treatment and Care Coordination ROI may not be redisclosed for legal purposes. |
| How many types of legal proceeding can be selected in one Legal Proceeding ROI? | Only one type of legal proceeding can be selected on one Legal Proceeding ROI. However, a client may have more than one Legal Proceeding ROI for the same type of Legal Proceeding, i.e., a client may have two (2) criminal cases at one time. In this scenario separate ROIs would be needed if the client wants to limit the information shared per |

| Legal Proceedings Questions | Answer |
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| | authorized entity. |
| What proceeding type should be used for Department of Child and Family Service (DCFS)? | <p>It depends, DCFS investigations may lead to involvement in court proceedings with the Juvenile Dependency Court, which would fall under a civil proceeding.</p> <p>However, depending on the case, criminal charges may be brought up and processed in Criminal Court.</p> <p>There may be instances where two (2) ROIs are needed, one (1) for civil and one (1) for criminal proceedings.</p> |
| If a client who is mandated to treatment doesn't want urine drug test results released to their parole agent, how do we communicate to the limitations of the ROI? | Clients are entitled to limit the disclosure of their records even if mandated to treatment. If the parole agent is asking for the drug test results, providers may inform them of what is allowed to release based on the signed ROI. |
| If a client has multiple cases, how should the case numbers be entered? | <p>If the cases are of the same proceeding type, then the case numbers may be listed in the "If available, specify additional information (i.e., case number) related to the legal proceeding(s) for which you authorize the use and disclosure of your SUD health information" field in section on page 3.</p> <p>If they are different proceeding types, then separate ROIs should be signed.</p> |
| What proceeding type does an eviction fall under? | Evictions that are processed through the legal system such as obtaining an Unlawful Detainer, would fall under a civil proceeding. |
| Does legal proceeding mean that providers may deny a formal investigation such as a court order? | No. Disclosure of client information requires a signed release of information unless otherwise authorized by the Final Rule in Subpart D or Subpart E. |
| Clients who are court ordered to treatment may need information released to a judge, attorney | Yes, a SAPC Legal Proceedings ROI would be needed if disclosures are made for legal purposes. |

| Legal Proceedings Questions | Answer |
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| and case managers. In this case, is a legal ROI needed? | |
| What is the appropriate proceeding type for the Department of Motor Vehicles (DMV)? | <p>DMV Administrative Hearing may be called for:</p> <ul style="list-style-type: none"> • A DUI-related case (Admin Per Se or Chemical Refusal). • A driver's license was suspended due to a medical condition. • Receiving a Negligent Operator notice. <p>These would fall under administrative proceedings.</p> <p><i>Note: there may be concurrent criminal or civil proceedings stemming from a singular event, such as a motor vehicle accident related to driving under the influence. The DMV administrative hearing would be for determining the motorist's license. The criminal case may be related to there being damage to property or possible victims of the collision. The civil case may be the motorist being sued by the victim for damages.</i></p> |
| If a client is in court and the judge asks an SUD Part 2 program practitioner to disclose the client's SUD information, but there is no signed ROI, can the practitioner disclose information? | <p>Disclosing information without a signed SAPC Legal Proceedings ROI is a violation of 42 CFR Part 2. The practitioner should indicate that information cannot be released without a signed release on file. A request may be made to the judge for the client to sign a release in the moment.</p> <p>If that is not allowed, practitioners should hold privilege. However, the judge may compel the practitioner to disclose information.</p> <p>Providers should have policies and protocols in place to address these scenarios.</p> |
| Is a new legal proceeding ROI required for each disclosure if I am making multiple updates for the same case (e.g., regular updates to a social worker for an active DCFS case)? | <p>One (1) ROI is sufficient for all disclosures related to a single case, as long as the information shared remains within the original scope and is only between the entities listed on the form.</p> <p>If you are disclosing information outside of that original scope or to an unlisted, a new legal proceeding ROI is required.</p> |

| Legal Proceedings Questions | Answer |
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| Can identified entities be a group or office instead of an individual, such as LA County Probation Department vs Probation Officer Smith. | Yes, an approved entity is not limited to an individual person but may reflect a group practice, office or even an agency or legal entity. |
| Do we need to list our own agency as an approved Entity? | Yes. It is important the provider agencies list their agency, as it gives the other agency permission to share with you directly. |

ROI for Treatment and Care Coordination Questions

| Treatment and Care Coordination Questions | Answer |
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| If requesting an ROI for care coordination from a non-SAPC provider, how do we fill out “II. Entities Authorized to Share Health Information”? | Please enter the information for both the releasing entity and the receiving entity in section II. Entities Authorized to Share Health Information. |
| Do addresses need to be specifically added, or would names and phone numbers suffice? | It depends. If the disclosure is only verbal, then a telephone number will suffice. If records are to be sent, then an additional contact field needs to be entered such as the address. |
| What constitutes “Outside of SAPC’s Provider Network”? | This can include but not limited to family, friends, other treatment providers such as their primary care physician/group or therapist from DMH, or other client-identified support people. |
| Do clients truly need to list their out-of-network providers? Part 2 allows "a single consent for all future treatment and coordination by stating "my treating providers, health plans, third-party payers, and people helping to operate this program.” | Yes, otherwise provider will not know who is authorized to receive disclosures. |
| If a client is in the hospital and requests their medication dose, can that be disclosed? | There are limited exceptions to disclosures without written consent, such as a medical emergency. If the request for records is made outside of an exception, then a ROI must be signed. The client |

| Treatment and Care Coordination Questions | Answer |
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| | may sign a ROI at the hospital, then it can be sent to your program for review. |
| If a client does not want SAPC Agency #2 to know about their SUD care with SAPC Agency #1, how is that implemented? | Check the second check box, "Select SAPC Provider Agency(ies) in section II. Entities Authorized to Share Health Information. Enter the agency(ies) to which the client is authorizing disclosures. |
| When a client revokes consent, from their family member(s) for example, can we inform them that the client revoked consent? Would that be harmful for the patient? | Once consent is revoked there can be no further disclosures or acknowledgements of the client. This would be similar to someone calling to inquire about a client and not being able to confirm or deny that individual is a client. |
| If "SAPC's Entire Provider Network" is selected, does any SAPC in-network provider need to be listed in Section II: Entities Authorized to Share Health Information? | <p>No, if the "SAPC's Entire Provider Network" is selected, the SAPC in-network provider does not need to be listed.</p> <p>If either "Select SAPC Provider Agency(ies)" or "Outside SAPC's Provider Network" is selected, any SAPC in-network provider that needs to be authorized to share or disclose records needs to be listed, including your own agency.</p> |

In Custody Population

| Legal Proceedings Questions | Answer |
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| For Juvenile Hall clients under the age of 18 can they sign their own ROIs? | <p>Yes, according to minor consent laws, minors 12 and older can consent to substance use disorder services without parent or guardian consent if appropriate and there the courts have not designated an authorized legal representative.</p> <p>Agencies serving clients within Juvenile Halls should follow any relevant court orders for consent and treatment in situations where the court has designated itself or others as the authorized legal representative.</p> |

| Legal Proceedings Questions | Answer |
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| Do all client in custody settings need a Criminal Legal Proceedings ROI? | If disclosures are made for the purposes of a legal proceeding such as an ongoing court case then select the appropriate type of legal proceeding, which may include Criminal, but they may also have other legal matters requiring additional ROIs for different legal proceeding types. |
| For Juvenile Justice Program in the LA Camp Sites that are not claimed to Medi-Cal and are invoiced through PIAS, is SAPC Payment and Operations ROI form required and sufficient for claiming? | The SAPC Payment and Operations ROI is required when disclosing PHI for billing purposes, such as associating a client's name to a claim. If claiming does not include PHI, such as the current process with PIAS and LA Camp sites, then a PO is not required |

Notice to Accompany Disclosures/Disclosure Accounting

| Questions | Answer |
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| What is the Notice to Accompany Disclosures? | As part of the Final Rule, the Notice to Accompany Disclosures describes the law regarding redisclosures of said released records. |
| When we get an ROI from an outside entity for records does the disclosure need to have a Notice to Accompany Disclosures? | Yes, all non-verbal releases of records disclosed by your agency require the Notice to Accompany Disclosures. If the client doesn't have a SAPC ROI on file, which includes a Notice to Accompany Disclosures section, then providers may copy the section into their own document with agency letterhead. |
| Is there any form required for documenting disclosures of information? | There is no specific form in Sage that providers are required to complete for documenting disclosures of information. Providers may use any documentation method that best fits their workflow, provided that it captures all information required under 42 CFR § 2.25 and 45 CFR § 164.528 which includes: <ul style="list-style-type: none"> • Date of disclosure • Name of recipient/entity receiving the information • Purpose of, or authority for disclosure • Brief description of information disclosed and |

| Questions | Answer |
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| | <ul style="list-style-type: none"> Is the disclosure made pursuant to patient consent. |
| Can the Provider File Attachment records be used for the disclosure log? | No, the Provider File Attach Report does not include the details required for a disclosure log should a client request an account of disclosures. |
| Will we need to log every email disclosure that is sent to a caseworker, attorney, PO, etc...? | 42 CFR 2.25 requires a Part 2 program to provide a patient, upon request, an accounting of disclosures made with consent in the three (3) years prior to the date of the request. Therefore, a log should be kept when disclosures are made. |
| Is the disclosure log for the request of information or how many ROIs were filled? | The disclosure log is what is provided to a client when they request an account of disclosures. It is a summary of when, what, and to whom information was disclosed. |

Agency Specific Forms

| Questions | Answer |
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| Can providers use agency specific ROIs that have been vetted by our own legal counsel? | SAPC specific ROIs are required to be used by contracted treatment providers for SAPC business. |
| We cover healthcare/payment operations needs for data sharing in our privacy practices for all our clients. Is there a pathway for SAPC to approve that for this requirement? | The SAPC Payment and Operations ROI is required and including language in your agency's Notice of Privacy Practices (NPP) is not sufficient as it does not allow the client to revoke. |
| Can Secondary Providers recreate the three (3) ROIs into their own primary EHR and upload the forms in PCNX? | Yes, SAPC's Health Information Management section developed a review and approval process for Secondary Providers who wish to recreate SAPC's approved ROIs within their own EHR. |
| As secondary providers, are we still required to use the SAPC Legal Proceedings and SAPC Treatment and Care Coordination ROIs for disclosures when none of the | Yes. Clients receiving treatment services by a treatment provider contracted with SAPC are required to use SAPC's approved ROIs. |

| Questions | Answer |
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| records/data are coming from Sage PCNX? | |

