

Iowa Recovery Health Information Technology (IRHIT) Confidentiality and Participant Protection

The Iowa Department of Public Health (IDPH) recognizes the importance of client/participant confidentiality and compliance with HIPAA, 42 CFR Part 2, and other applicable state and federal confidentiality regulations protecting clients with substance use disorders from unauthorized disclosures.

1. Protect Clients, Participants and Staff from Potential Risks:

- Foreseeable physical, medical, psychological, social, and legal risks or potential adverse effects as a result of the project itself or any data collection activity.
 - Physical – NA
 - Medical – NA
 - Psychological – Possible risk to confidentiality when IRHIT participants use computer work stations in community locations such as public libraries.
 - Social – Possible risk to confidentiality when IRHIT participants use computer work stations in community locations such as public libraries.
 - Legal – NA
- Procedures to minimize or protect participants against potential risks, including risks to confidentiality.
 - Each IRHIT participant will be trained how to use the Recovery web portal, and informed of possible risks to disclosure of protected information. Participants will be encouraged to never use publicly accessible work stations.
 - IRHIT participants will have personal passwords and pins to access the portal. Even so, no protected information will ever be stored in Recovery as it is simply a tool to facilitate secure communication.
 - Each IRHIT participant will be assessed monthly using the GAIN-SS to assess their behavioral health status.
- Identification of plans to provide guidance and assistance in the event there are adverse effects to participants.
 - Each IRHIT participant will have access to qualified substance abuse treatment professionals in the event of unforeseen adverse effects.
- Alternative treatment and procedures that may be beneficial to the participants.
 - Each IRHIT participant can choose to use more traditional face-to-face services.
 - Each IRHIT participant will have access to individualized treatment plans based on ASAM levels of care to provide continuous level of care assessment and referral if needed.

2. Fair Selection of IRHIT Participants

- Populations of focus for the IRHIT project including age, gender, and racial/ethnic background. The population may include homeless youth, foster children, children of substance abusers, pregnant women, or other targeted groups.
 - Adults ages 18 and over who reside in Iowa counties designated as rural by the Iowa Data Center who are assessed as in need of Outpatient levels of care. IRHIT participant family members can also use the Recovery web portal (each family member will have their own user id and password).

- Clients shall not be recruited. All clients from rural counties will be offered the opportunity for inclusion following assessment for appropriateness to treatment within the Intensive Outpatient (IOP) and Extended Outpatient (EOP) levels of care. Clients will self select.

3. Absence of Coercion

- IDPH considers the IRHIT project voluntary for all potential participants. Even though potential participants may be ordered by courts to participate in substance abuse treatment, their participation in IRHIT will remain voluntary.
- IRHIT participants can be awarded incentives (e.g., money, gifts, etc) as long as it is appropriate, judicious, and conservative. Any incentives offered/provided cannot provide an “undue inducement” which removes the voluntary nature of participation.
 - As part of the project design, IRHIT participants are clients who have screened as appropriate and agree to participate, are orientated to the IRHIT project, and sign the IRHIT Voluntary Consent.
 - IRHIT participants are asked to complete a Government Performance and Results Act (GPRA) intake, discharge and follow-up. Each participant will be provided a twenty-dollar gift card as an incentive at completion of the GPRA follow up interview. This incentive has been used extensively in Iowa’s ATR project and has been written into the design of Iowa’s SBIRT project. It has not been found to create undue inducement.
 - No IRHIT participants will be denied services for lack of participation. The IRHIT Project Director will monitor all providers. All clients will be informed of their rights not to participate in the IRHIT project at assessment.

4. Privacy and Confidentiality

- All providers of IRHIT services are subject to applicable federal and state laws covering substance abuse treatment client privacy and confidentiality including Title 42 of the Code of Federal Regulations, Part II.

5. Adequate Consent Procedures

- The IRHIT is not a research project. Voluntary Consents gained from clients agreeing to become IRHIT participants are exclusively treatment consents and are obtained and explained to clients at the time of admission to treatment by state-licensed substance abuse provider staff. All IRHIT participants are protected by applicable state and federal laws. IRHIT participant consent to use the Recovery web portal services is voluntary.

6. Risk/Benefit Discussion

- Risks are limited to those consistent with those to which IRHIT participants are exposed in the course of involvement in substance abuse treatment.

For more information about the IRHIT Project, contact Rebecca Swift at 515.242.6514 or rebecca.swift@idph.iowa.gov.