SAN BERNARDINO COUNTY | Behavioral Health

Provider Directory API Policy

Effective Date	05/08/2025	*Dr. Georgina Yoshioka*
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Policy

It is the policy of the Department of Behavioral Health (DBH) to ensure DBH third party developers have access to a current directory of service providers (Provider Directory) in accordance with the CMS Interoperability and Patient Access Final Rule (BHIN 22-068 and BHIN 22-032).

Purpose

To describe the Provider Directory API and establish guidelines for routine testing, monitoring, and updating of the Patient Access and Provider Directory Application Program Interface (APIs) managed by DBH.

Definitions

Application Programming Interface: A set of rules and protocols that allows different software applications to communicate with each other.

Functional Testing: A type of software testing that evaluates the functionality of a software application by testing it against the specified requirements.

National Provider Identifier Number: A 10-digit standard unique health identifier for health care providers assigned by the National Plan and Provider Enumeration System (NPPES).

Netsmart: The DBH electronic health record (EHR) vendor.

Privacy Compliance Testing: A type of test used to identify and fix vulnerabilities to ensure client PHI is protected.

Security Testing: A type of software testing that uncovers vulnerabilities, threats, risks in a software application and prevents malicious attacks from intruders.

Location of the Provider Directory

DBH, in partnership with Netsmart, has established and will maintain a Provider Directory Application Programming Interface (API) accessible to DBH clients, staff and the general public on the DBH internet website:
- An online printable provider directory (Directory) will be available on this site that comes from the same database that stores all DBH provider data, and
- This site also will contain a simple search engine that accepts parameters and returns provider information.
- More information regarding this API is available at Developer API Resources – DBH Internet Website.

Continued on next page

Information Included in the Provider Directory	The following information is included in the Directory for every provider: • Name of provider, medical group/foundation, independent physician/provider associations, or site as well as any group affiliation; • National Provider Identifier Number (NPI); • Street address(es); • All telephone numbers associated with the practice; • Website URL for each service location or physician provider, as appropriate; • Specialty, as applicable; • Hours and days when each service location is open, including the availability of evening and/or weekend hours; • Services and benefits available; • Whether the provider is accepting new clients; • Cultural and linguistic capabilities and if the provider has completed cultural competence training; • Whether the provider's office/facility has accommodations for people with physical disabilities, including in offices, exam room(s), and any equipment used, and • Telephone number to call the 24/7 access line.

Provider Directory Updates in myAvatar	To update provider information in myAvatar:
	• Information is entered manually by DBH staff in the EHR via the Healthcare Provider Information Set.
	   o This information is used to transmit, update, and query the DBH provider database;
	   o Data will be available as soon as it is entered into the 274 Provider Directory Definition database tables;
	   o A log of the updates is maintained within the DBH myAvatar database.
	• The Provider Directory API is updated by DBH Research and Evaluation (R&E) no later than 30 calendar days after DBH receives provider information or is notified of a change.

Routine Testing	DBH IT will be conducting the tests below to ensure the APIs meet all regulatory requirements: • **Functional Testing:** Regular functional testing will be conducted to verify that the Provider Directory API meets the expected outcomes, including data accuracy, completeness, and responsiveness.

Routine Testing, continued	• **Security Testing**: Security assessments, including vulnerability scanning and penetration testing will be performed routinely to identify and mitigate potential threats and vulnerabilities. • **Privacy Compliance Testing:** Privacy controls will be tested to ensure compliance with applicable regulations, including HIPAA and the Interoperability and Patient Access Final Rule.
Monitoring Incident and Response	Netsmart will continually monitor the Provider Directory API to ensure availability and notify DBH-IT of system downtime. • **Monitoring:** Continuous monitoring tools will be employed to detect anomalies and performance issues in real time. • **Incident Response:** A predefined incident response plan will be activated in the event of system down time, with immediate steps to mitigate the issue and notify affected parties as necessary.
Updates and Upgrades	Netsmart will update the Provider Directory API as needed in response to any system improvements or regulation changes. • **Routine Updates:** The Provider Directory API will undergo routine updates to incorporate enhancements, security patches, and functionality improvements. • **Regulatory Compliance Review:** Updates will also be made in response to changes in regulatory requirements to ensure ongoing compliance with the Interoperability and Patient Access Final Rules. • **Stakeholder Communication:** All significant updates will be communicated to relevant stakeholders, including internal teams, partners, and end-users, as appropriate.
Training and Awareness	DBH IT staff will ensure the following: • **Staff Training:** IT staff and relevant personnel will receive regular training on the technical, privacy, and security aspects of the API. • **Vendor and Partner Engagement:** Vendors and partners will be required to adhere to all regulations regarding the API and will be periodically reviewed for compliance by DBH IT staff.

Provider Directory API Policy, Continued

Referenced Forms, Policies, and Procedures	DBH Standard Practice Manual and Departmental Forms: • Access To Medical Records Request (COM021) • Release Of Information: Patient's Right Of Access To His/her Own Medical Record (COM026) • Access And Amendment Of Medical Records Policy (COM0931) • Client API Access Control and Availability Policy (IT5026) • Client API Access Control and Availability Procedure (IT5026-1)
Reference(s)	• 42 CFR section 431.70 • 42 CFR § 431.60(h)(1) • Assembly Bill (AB) 133 • BHIN 23-032 Interoperability and Patient Access Final Rule Compliance Monitoring Process • BHIN 22-068 Interoperability and Patient Access Final Rule • CMS Interoperability Rule & CMS Interoperability Specification • Cures Act • Health and Safety Code section 130290 • Welfare and Institutions Code (W&I) section 14184.100, et seq.