



INTERIM INSTRUCTION NOTICE #24-005

October 1, 2024

SUBJECT: Patient Access and Provider Directory Application Program Interface (API) Testing & Monitoring for MHP & DMC-ODS

DISTRIBUTION: Department of Behavioral Health

OBSOLETE: Upon completion of related policy and/or procedure

Effective Date October 1, 2024

From Department of Behavioral Health (DBH) Information Technology (IT)

Introduction The purpose of this Interim Information Notice (IIN) is to establish guidelines for routine testing, monitoring, and updating of the Patient Access and Provider Directory Application Program Interface (APIs) managed by San Bernardino County Department of Behavioral Health. This IIN ensures that these APIs remain compliant with the technical, privacy, and security standard outlined in the Interoperability and Patient Access final Rule. This IIN applies to all IT staff, vendors, and partners involved in the development, maintenance, and management of the Patient Access and Provider Directory APIs at San Bernardino County Department of Behavioral Health.

Background In May 2020, Centers for Medicare & Medicaid Services (CMS) finalized the Interoperability and Patient Access final rule (CMS Interoperability Rule), which seeks to establish beneficiaries as the owners of their health information with the right to direct transmission to third-party applications. CMS and the Office of National Coordinator for Health Information Technology have established a series of data exchange standards that govern such specific transactions.

Assembly Bill (AB) 133 (Committee on Budget, Chapter 143, Statutes of 2021) implements various components of the CalAIM initiative, including those components in Welfare and Institutions Code (W&I) section 14184.100, et seq., and Health and Safety Code section 130290 to implement the California Health and Human Services Data Exchange Framework, including the CMS Interoperability Rule. The Department of Health Care Services is authorized to develop and implement Article 5.51 of the W&I Code and the requirements of the California Health and Human Services Data Exchange Framework. This San Bernardino County Department of Behavioral Health IIN supports this implementation.

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Routine Testing

DBH IT will be conducting the tests below to ensure the APIs meet all regulatory requirements:

- a. **Functional Testing:** Regular functional testing will be conducted to verify that the APIs meet the expected outcomes, including data accuracy, completeness, and responsiveness.
 - b. **Security Testing:** Security assessments, including vulnerability scanning and penetration testing will be performed routinely to identify and mitigate potential threats and vulnerabilities.
 - c. **Privacy Compliance Testing:** Privacy controls will be tested to ensure compliance with applicable regulations, including HIPAA and the Interoperability and Patient Access Final Rule.
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Monitoring Incident and Response

DBH IT will continually monitor the APIs and ensure that any security breaches are addressed immediately.

- a. **Monitoring:** Continuous monitoring tools will be employed to detect anomalies, performance issues, and potential security threats in real-time.
 - b. **Incident Response:** A predefined incident response plan will be activated in the event of a security breach or significant performance degradation, with immediate steps to mitigate the issue and notify affected parties as necessary.
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Updates and Upgrades

DBH IT will update the APIs as needed in response to any system improvements or regulation changes.

- a. **Routine Updates:** The APIs will undergo routine updates to incorporate enhancements, security patches, and functionality improvements.
 - b. **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.
 - c. **Stakeholder Communication:** All significant updates will be communicated to relevant stakeholders, including internal teams, partners, and end-users, as appropriate.
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Training and Awareness

DBH IT staff will ensure the following:

- a. **Staff Training:** IT staff and relevant personnel will receive regular training on the technical, privacy, and security aspects of the APIs.
 - b. **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.
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Reference(s)

- [CMS Interoperability Rule & CMS Interoperability Specification](#)
 - [Assembly Bill \(AB\) 133](#)
 - [Welfare and Institutions Code \(W&I\) section 14184.100, et seq.](#)
 - [Health and Safety Code section 130290](#)
 - [Cures Act](#)
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Questions

For questions regarding this Interim Instruction Notice, please contact DBH IT at (909) 386-9730 or via email at dbh-it-helpdesk@dbh.sbcounty.gov
