

## **FINAL PROCESSES RECOMMENDED BY THE OPT-OUT WORKGROUP:**

The following items included the final recommendations by the Opt-Out Workgroup as ways to operationalize the opt-out process at WISHIN:

1. Organizations participating in WISHIN should be given flexibility in how the opt-out information is given to their patients. WISHIN should not require participating organizations to update their Notice of Privacy Practices (NPP) as part of the opt-out process; however, WISHIN should accommodate this process if selected by the participant.
2. The patient must sign an opt-out form and an additional signature would be required from one of the following options:
  - Provider or Medical Staff
  - Witness

Organizations participating in WISHIN should be allowed to choose whether or not they would like their providers and/or medical staff involved in signing the opt-out form.

3. Patient calls direct to WISHIN for the purpose of opt-out would be acceptable only for requesting the opt-out form. WISHIN should not process an opt-out using only a telephone contact.
4. WISHIN's website should allow patients to request and/or download the opt-out forms.
5. If possible, WISHIN should consider accepting opt-out requests via website submission provided that the site could use two-factor authentication to authenticate the patient.
6. A post-process mailing to the patient to confirm their opt-out and provide opt-in materials is highly recommended.
7. WISHIN should recommend participants modify their Notice of Privacy Practices to include their participation in WISHIN, but it is not required.

More automated options should be considered if demand warrants and if technological capabilities and budget allow:

1. Place equipment (or leverage clinic/hospital site equipment) at the participating organization's location to allow patients to opt-out while at the clinic/hospital location.
2. "Tether" a web-based opt-out application/website to the provider's existing patient portal so that secure information about the patient can be securely sent to WISHIN to facilitate the opt-out.