DirectTrust® CARIN Code of Conduct for Consumer-Facing Applications (CARIN-CFA) Accreditation Program

Independent Accreditation of Consumer Apps

The CARIN Code of Conduct for Consumer-Facing Applications (CARIN-CFA) Accreditation Program enables patient and data holder confidence in app developers' ability to safeguard sensitive consumer health data. DirectTrust's CARIN-CFA Accreditation Program was established in collaboration with the CARIN Alliance.

The **CARIN Code of Conduct** was first developed to provide expectations for data handling practices of digital health applications which may not be subject to HIPAA. The Code supports the goals of the Centers for Medicare & Medicaid Services (CMS) rulemaking, including the Interoperability and Patient Access Rule, which aims to accelerate the ability of individuals to access personal health information via applications that leverage HL7® FHIR® application programming interfaces (APIs). The Code represents the consensus view of a group of over 60 multi-sector stakeholder participants and references internationally recognized standards and best practices.

As consumer-directed exchange expands, so do expectations around privacy, data use transparency, and accountability, particularly for entities not covered by HIPAA.

DirectTrust's CARIN-CFA Accreditation Program transforms the voluntary Code into a structured, independent accreditation conducted by subject matter expert Assessors.

By achieving accreditation, organizations demonstrate validated implementation of the Code's principles through third-party review.

Program Highlights

Independent Assessment
- Accreditation demonstrates an organization's commitment to trust, transparency, and operational excellence. It provides independent validation of compliance, strengthens credibility with customers and partners, and may be required for participation in certain programs and trust frameworks.

Evidence-Based, Comprehensive Review
- An organization's policies, procedures, and operational controls are measured against the CARIN Code of Conduct to ensure full alignment with its intent and expectations.

Leadership and Subject Matter Expert Interviews
- Validation discussions confirm that policies are implemented in practice.
- Assessors review content as subject matter experts and give consultative feedback as part of the accreditation process.

Evaluation areas include:
- Privacy and security safeguards
- Transparency and consumer notice practices
- Data use and secondary sharing controls
- Consumer rights and revocation mechanisms
- Organizational governance and accountability

Accreditation measures implementation, not just acknowledgment. The CARIN-CFA program is rich in best-practice privacy content. This ensures that consumers have transparency and control over their data.

Trust and Assurance

Independent, Third-Party Review:
- Provides objective validation beyond self-reported conformance
- Promotes consistency across participating organizations
- Increases ecosystem trust
- Offers greater confidence to payers, providers, regulators, and consumers

The rigor and scope of review reflect the level of assurance the digital health ecosystem expects.

Key Benefits

Demonstrate Credible Compliance
Generate formal documentation confirming conformance to the CARIN Code of Conduct.

Build Consumer Confidence
Signal responsible stewardship of consumer-directed health data.

Strengthen Market Position
Differentiate your organization through independent accreditation.

Secure Status
Once all criteria are met, accreditation is granted for two years.

Reduce Risk
Identify and address privacy and governance gaps before they become regulatory or reputational issues.

Compound Accredited Programs
The CARIN program pairs well with other accreditation programs that allow an organization to voluntarily add more robust security and cybersecurity measurements.

Who Should Apply?

This program is designed for organizations that:
- Develop or operate consumer-facing applications
- Receive patient-directed data via APIs
- May operate outside of HIPAA's direct scope but handle sensitive health information
- Seek structured validation of transparency and privacy practices

Learn more about CARIN-CFA Accreditation at bit.ly/CARINaccreditation.