CRISP

Cross-Facility Patient-Level Data Sharing Policy

Last Update: August 26th, 2022

Overview

CRISP currently generates reports and offers analytic tools that rely on claims data linked to the CRISP unique patient identifier. These patient level reports enable users to see cross-facility visits for patients they had a treatment relationship with in the past 36 months.

Providers are increasingly responsible for playing a key role in coordination care and managing the health of patients to whom they have provided care. To effectively act in this capacity, providers have requested access to information on their patients that is created both within their organization and during visits to other locations. CRISP has the capability to create detailed cross-hospital reports and has developed reports that enable users to analyze patient utilization across all Maryland hospitals and other participating sites. CRISP also has the capability to combine hospital information with other data, including but not limited to Admission, Discharge, and Transfer (ADT) events, administrative claims, public health datasets, and practice panels. The multi-site reports enable authorized users to identify their patients who are high utilizers of services or who may benefit from care coordination.

The purpose of this policy statement is to define the guidelines under which authorized users will be permitted to access multi-site, patient-level reports to identify their patients, including data produced at other locations, who could benefit from care coordination efforts.

Permitted Purpose Category

The CRISP permitted purpose category under which this policy is governed is for quality assessment and improvement activities, including care coordination, defined in HIPAA as a subset of health care operations activities.

Opt-Out Applicability

Patients may opt out of CRISP and Medicare beneficiaries can opt out with Medicare directly to prevent their data from being shared. Patients who opt-out will not be included in reports that are not required by a regulatory body.

Background on CRISP Data Sharing

CRISP currently enables providers actively treating a patient to access health information in real-time created by any other participating provider through the CRISP Portal. The content that is accessible through this secure Portal includes clinical encounter data such as lab results, scheduled prescription medication data, discharge reports, operative reports, and consultation reports.

CRISP shares data through various modalities. Providers actively treating a patient can access health information in real-time created by any other participating provider through the CRISP Portal. Subscribing providers can also receive real -time alerts when their patients are hospitalized through the Encounter Notification Service. The CRISP Reporting Service compiles data for providers to view for their patient population.

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CRISP will generate and make available multi-site, patient-level reports to participants as outlined by the criteria below. The reports include data produced during encounters at other hospitals or provider sites to which certain policies will apply. Authorized users will access the report through a secure website provided by CRISP.

1) The cross-facility reports may only be used for a Permitted Purpose under the Participation Agreement.
2) Authorized users will be permitted to access summary and patient-level reports for patients with whom they have an active treatment relationship inclusive of patient data produced during visits at other locations for a 36-month period.
3) Reports may include data from any permitted CRISP sources, including but not limited to HSCRC case mix data, Medicare and Medicaid claims, ADT encounter information, the Prescription Drug Monitoring Program, clinical information from CRISP Participants, and Maryland Department of Health supplied data
4) Reports may include derived analytic enhancements such as readmission flags, Prevention Quality indicators, risk scores, and other measures.
5) As stated in the CRISP Participation Agreement, organizations that access CRISP data must provide materials and resources to patients describing their sharing of patient information for care coordination purposes.
6) Report data that has special disclosure requirements will be handled according to the relevant laws and regulations, including 42CFR Part 2 and Maryland's Confidentiality of Medical Records Act.
7) Any patient that has opted out of CRISP will have identifying information excluded from the non-regulatory reports but may be included in the aggregate counts or rates.
8) Users are prohibited from using multi-site, patient-level reports, or any derivative or downloaded content from the reports, for marketing or patient outreach, activities unrelated to care coordination and quality improvement.
9) Users may only download or store protected health Information from CRISP reports to a secure network operated by the Participating Organization; any downloaded data must include a prominent indication that the report is restricted for use in care coordination activities. This provision does not apply to inclusion of a single patient's information in a clinical/care management record.

In addition to providing reports to Participants, this use case also allows Participant data to enrich other data sources, including claims data. For example, clinical data from Participants may be used to supplement other data sources with any information in the Master Patient Index, including demographic information and race and ethnicity.

Approval

This Use Case was originally approved on November 10, 2016.

Chairperson

6/26/23
Dated