



PreventionLink Direct Referral Program Description

March 2020

CRISP (Chesapeake Regional Information System for our Patients), the Health Information Exchange for Maryland, is working with health care providers and public health authorities to improve the ability for healthcare providers to make referrals to appropriate social service and prevention programs, including diabetes prevention programs. CRISP and the Prince George's County Health Department are collaborating to implement the following model. *The PreventionLink program integrates clinical practice with evidence-based public health programs to improve health outcomes for patients at all levels of risk for chronic disease, from persons at risk for diabetes and heart disease to high-system utilizers with frequent hospitalizations. Innovations in the use of health information technology and development of communities of practice will bring together stakeholders in chronic disease care with a shared goal of reducing the burden of diabetes, hypertension, and stroke in underserved areas of Prince George's, St. Mary's, Charles, and Calvert counties.* This referral pilot is permitted in accordance with HIPAA and CRISP Permitted Purpose: treatment of individuals. While the Organization is not a HIPAA covered entity, the organization is able to receive PHI as a part of a referral from a provider without patient authorization under HIPAA rules permitting disclosures for treatment purposes (including the coordination of health care by a health care provider with a third party),^[1] as clarified by the Office for Civil Rights in an FAQ.¹

- 1) Primary Care providers who are CRISP participants and partners in the Prince George's County PreventionLink project, will use CRISP tools to make referrals to a PreventionLink Program for patients identified as in need of this intervention. These providers will log in to CRISP's Unified Landing Page and use the provider referral tab to complete a referral form. Referrals will contain the minimum necessary amount of patient information to support the referral. Providers will record patient consent for the referral to the one or more of the approved PreventionLink programs on the form. Providers will also keep a record of the referral in their patient's record.
- 2) CRISP will route the referral to the PreventionLink Central Referral System (CRS) at Prince George's County Health Department who will then route the referral to the program(s) chosen by the primary care provider. The referral will be routed to the CRS direct email address, which will be provided by CRISP and will then be shared to the specified prevention program via their direct email address, which will also be provided by CRISP.
- 3) The PreventionLink CRS will ensure that patients have been informed of who will have access to their information to facilitate the referral. A process for patient education will be implemented that ensures that patients understand that the Prince George's County Health Department and the referred program will have access to their information through the referral and if applicable, through a follow-up process. The patient must be provided an opportunity to opt-out of their information being shared with CRISP. Part of the patient enrollment notification includes the following language (provided by CRISP):

^[1] 45 C.F.R. § 164.506.

^[2] <https://www.hhs.gov/hipaa/for-professionals/faq/3008/does-hipaa-permit-health-care-providers-share-phi-individual-mental-illness-third-party-not-health-care-provider-continuity-care-purposes/index.html>.



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We have chosen to participate in Chesapeake Regional Information System for our Patients (CRISP), the state-designated health information exchange for Maryland. As permitted by law, your health information will be shared with this exchange to provide faster access, better coordination of care, and improved knowledge for providers. You may choose to not have your information shared with CRISP. In addition, you may “opt-out” and disable all access to your health information available through CRISP by calling 1-877-952-7477 or completing and submitting an Opt-Out form to CRISP by mail, fax, or through their website at www.crisphealth.org. Public Health reporting and Controlled Dangerous Substances information, as part of the Maryland Prescription Drug Monitoring Program (PDMP), is available on behalf of all patients to providers by law.

- 4) The program will outreach to the patients who have been referred to them. Participation in this referral project does not provide the program access to CRISP services or otherwise, receive, view or use patient data available through CRISP. These abilities are reserved for CRISP participants who must be a health care provider or their business associate.
- 5) Patients will be enrolled in the program through a formal process. The PreventionLink program will educate patients about their data-sharing relationship with Prince George’s County Health Department and CRISP.
- 6) The program will capture program participation and all patient information weekly and will enter it into the systems of record and/or EHRs managed by the programs. The PreventionLink CRS will extract the data entered into the programs’ electronic system and manually populate the CRISP provided template with the required information to close the referral loop. The PreventionLink CRS will submit a panel of patients to CRISP each week excluding any patients who have opt-out of their data being shared via CRISP. CRISP will use the panel information to create a care alert notifying the primary care provider of the patient status in the identified program.
- 7) CRISP will display the relationship between enrolled patients and the identified program in the Snapshot tab.
- 8) The PreventionLink programs and CRISP will execute a Memorandum of Understanding (MOU) outlining the terms of service and how patient data must be handled and stored.

CRISP will conduct this program with the intention of aggregating feedback. CRISP will immediately suspend sharing data between PreventionLink and CRISP if potential security or patient privacy concerns arise as prescribed by the CRISP Incidence Response Plan (available for review upon request), or if PreventionLink does not want to continue for any reason.

CRISP

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4/4/20

Organization

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