Use Case Description: Aggregate Reports for Population Health

Overview

Aggregate data reports on health-related factors and outcomes may be beneficial to support, improve, and promote public health, including that of specific populations, while protecting patient-level privacy. In many cases, patient-level data is not necessary to accomplish broad goals, such as monitoring statewide health trends for policy decision making, evaluating the success of a program, monitoring health equity, or targeting specific geographic areas for interventions. In those cases, aggregate data reporting is an important tool to provide actionable data-driven insights, while protecting patient privacy and restricting access to patient level data. Aggregate data can be provided for a population, such as for a state or a county, or for a smaller identified population, such as a panel of patients enrolled in a specific program or with a specific health characteristic.

Under existing approved use cases, CRISP has seen the success and utility of providing aggregate reporting. This use case enables sharing aggregate data without requiring additional approvals or legislation. Some examples include:

- COVID-19 state of emergency: During the Covid-19 public health emergency, CRISP was asked to develop and make available numerous public health reports, including reports to track COVID hospitalizations and hospital occupancy; reports analyzing testing and test processing time; and reports to track trends in testing, confirmed cases, hospitalizations, and deaths throughout the pandemic. The process used to generate and publish these reports can be leveraged during other public health emergencies or for other public health needs.
- Parkinson's Registry: CRISP aggregated the number of individuals with Parkinson's disease in the state pursuant to Parkinson's Registry law.

Aggregate data may be provided as an option when there is not a HIPAA relationship between an entity and the patients of interest. For example, a community-based organization may want to evaluate clinical outcomes to better show value in addressing social determinants of health and improving health. A state-funded program for reducing health disparities may benefit from understanding reduction in health outcomes as seen in CRISP-mediated data.

Permitted Purpose Category

For a Public Purpose, as required or permitted by Applicable Law and consistent with the mission of the HIE to advance the health and wellness of patients in the CRISP service area (Permitted Purpose #2).

For Quality Assessment and improvement activities, including care coordination, defined in HIPAA as a subset of health care operations activities. (Permitted Purpose #3)

Use Case Description

CRISP will provide aggregate level reports upon request of a covered-entity and any public health authority, or other partner organizations who do not have clinical access, such as social service organizations, state agencies, and community organizations who may not be non-HIPAA covered entities. The reports would be generated and made available to the requestors and would be evaluated to determine whether other users would benefit from access to the report. Data used to generate the report could include multiple data types including but not limited to ADTs, labs, and other clinical data. Clinical data may be combined with HSCRC case mix or Medicaid or Medicare claims data upon approval of appropriate entities. Data requestors must inform CRISP and receive written approval if there are any plans to make the data publicly available.

Aggregate public health reports will not include patient-level information and will be subject to cell suppression, as necessary. No data will be reidentified. Any requests to de-aggregate or use cell sizes less than 11 will be considered a separate use case requiring access to patient-level data and no longer applies under the current use case.

CRISP will provide a list of the aggregate requests allowed under this use case to the Clinical Committee on an ongoing basis.

Eligible Participants

Staff at the following organizations are eligible for access (with acknowledgement of terms and conditions):

- CBOs/Other social agencies – Non-HIPAA covered providers enrolling individuals in programs should continue to provide a notice of participation with CRISP in enrollment materials and provide education on CRISP data sharing.
- Public Health / stage agencies– Public health officials requesting aggregate data should provide a write-up explaining why the information is necessary and any potential limitations or undue impacts.
- HIPAA-covered entities seeking broader information than their patient population

Opt-Out Applicability

Individuals who have chosen to Opt-out of CRISP services will not be included in these reports.

Patient Impact Statement

Patient risk is limited since data will remain aggregated and this use case will not allow for release of small cell sizes. It is likely within a reasonable expectation that a patient's aggregated, un-identifiable information will be shared to prevent disease or to evaluate the effectiveness of a program.

Approval

The Use Case Policy has been approved by the Clinical Advisory Board.

DocuSigned by:

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Chairperson

1/2/2024

Dated