Use Case Policy: Use of CRISP Services for Quality Improvement

Overview
HIPAA allows for quality assessment and improvement activities without patient authorization, including outcomes evaluation and development of clinical guidelines, provided that the obtaining of generalizable knowledge is not the primary purpose of any studies resulting from such activities and that the disclosing and receiving entities have a relationship with the patient whose data is being disclosed. Access to CRISP-mediated patient data will serve as an additional vehicle for advancing health care providers' and payers' quality improvement (QI) activities, including populating clinical and health registries. Individuals working on QI initiatives at their organizations will have a more effective and efficient way to access information and further activities to improve the health outcomes of their patients.

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

Quality Improvement Use Case Description
To use CRISP-mediated data under the Quality Improvement Use Case, CRISP participants will register their QI activity with CRISP, provide a panel of patients whose data will be accessed for the QI activity and a list of credentialed users who are to access the data for this purpose. Access to clinical data for purpose of populating clinical and health registries for quality improvement (non-research) purposes is an approved use of the data. For QI activities not related to populating registries, health care provider organizations and payers must provide a description of the QI activity and an attestation that the participating organization has determined the activity meets the HIPAA definition of quality improvement. The organization must also attest that they have a relationship with all patients whose data will be accessed and that they will only access minimum amount necessary to complete the QI activity.

Opt-Out Applicability
Any patient that opts out of CRISP will not have their data made available for quality improvement activities.

Eligible Participants
Quality Improvement uses of data are limited to health care providers and payers with an active relationship with patients whose data is to be accessed. CRISP users with a QI role assigned by their participating organization may have access to CRISP data for QI purposes. All users and their credentialed delegates must be verified by the participating organization point of contact and must complete required credentialing steps to gain access to the system.

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