



Care Coordination Patient Opt-in Policy

CRISP Board of Directors believes that appropriate data uses should be predicated on sufficient engagement and education of patients that ensures patients are aware of potential uses.

Policy: Patient opt-in consent is required to receive or access data for care management activities 90 days after a care transition from a hospital or for any care management activities apart from those related to an active treatment relationship. This consent may be verbal or written with appropriate documentation available for CRISP auditing.

Procedures:

1. In order to access a patient's health information for care coordination activities, participants shall include information about CRISP in an existing consent process required to enroll a patient in the care management program. If consent is not already required for enrollment in the care management program the participant must obtain patient consent to access CRISP services for care coordination purposes.
2. Patient's consent and revocation of consent must be obtained from the patient or patient's personal representative. Consent must be documented and must include the date patient was educated and the date consent was obtained or revoked.
3. Patient consent may be written or verbal and can be relied upon unless revoked by the patient or the patient's personal representative.¹
4. Participants may choose to document patient consent in CRISP Coordinator. If the participant uses another documentation method, documentation of consent or patient's revocation of consent must be made available to CRISP upon request, within the time specified in the request.
5. Participants are responsible for educating patients regarding their right to consent and revoke their consent and the process by which they can consent or revoke their consent.
6. The participant may provide the patient with educational informational supplied by CRISP or develop their own. Development and dissemination of educational materials must adhere to the CRISP patient education requirements outlined in the participation agreement.

¹ Personal representative as specified under 45 CFR 164.502(g).