



Golden Arms Referral Program Description

October 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 medically tailored meal related programs. CRISP and Golden Arms are collaborating to implement the following model. Golden Arms Assisted Living Placements arranges for quality care services for clients who are in the winter of their lifetime. They assist individuals who have disabilities and care for seniors who are becoming increasingly dependent on others as they age. 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 will use CRISP tools to make referrals Golden Arms 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 Golden Arms 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 Golden Arms ULP referral portal with a CRISP direct secure inbox as an option.
- 3) 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.
- 4) Patients will be enrolled in the program through a formal process. Golden Arms will educate patients about their data-sharing relationship with their program and CRISP. The patient must be provided an opportunity to opt-out of their information being included on the patient panel submitted to CRISP. Part of the patient enrollment notification includes the following language (provided by CRISP):
 - o *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*

^{[1][1]} 45 C.F.R. § 164.506.

^{1[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>.



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

- 5) The program will capture program participation and all patient information at least bi-weekly and will agree to provide CRISP, the required information to close the referral loop. The Golden Arms personnel agrees to login and manage the referral, excluding any patients who have opt-out of their data being shared via CRISP. CRISP will use the referral information to create a care alert notifying the primary care provider of the patient status in a given program.
- 6) CRISP will display the relationship between enrolled patients and the Golden Arms program in the Snapshot tab.
- 7) Golden Arms 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 Golden Arms 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 Golden Arms does not want to continue for any reason.

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Organization
 Golden Arms Assisted Living Placement

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Date: **11/24/2020**

Date: 11/18/20