

# Higher Education and Connie: A Look at Health Information Exchange in Connecticut



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# Today's Discussion

- Introduction to Connie, CT's Health Information Exchange
- A Look at HIPAA and FERPA

# Who is Connie ?

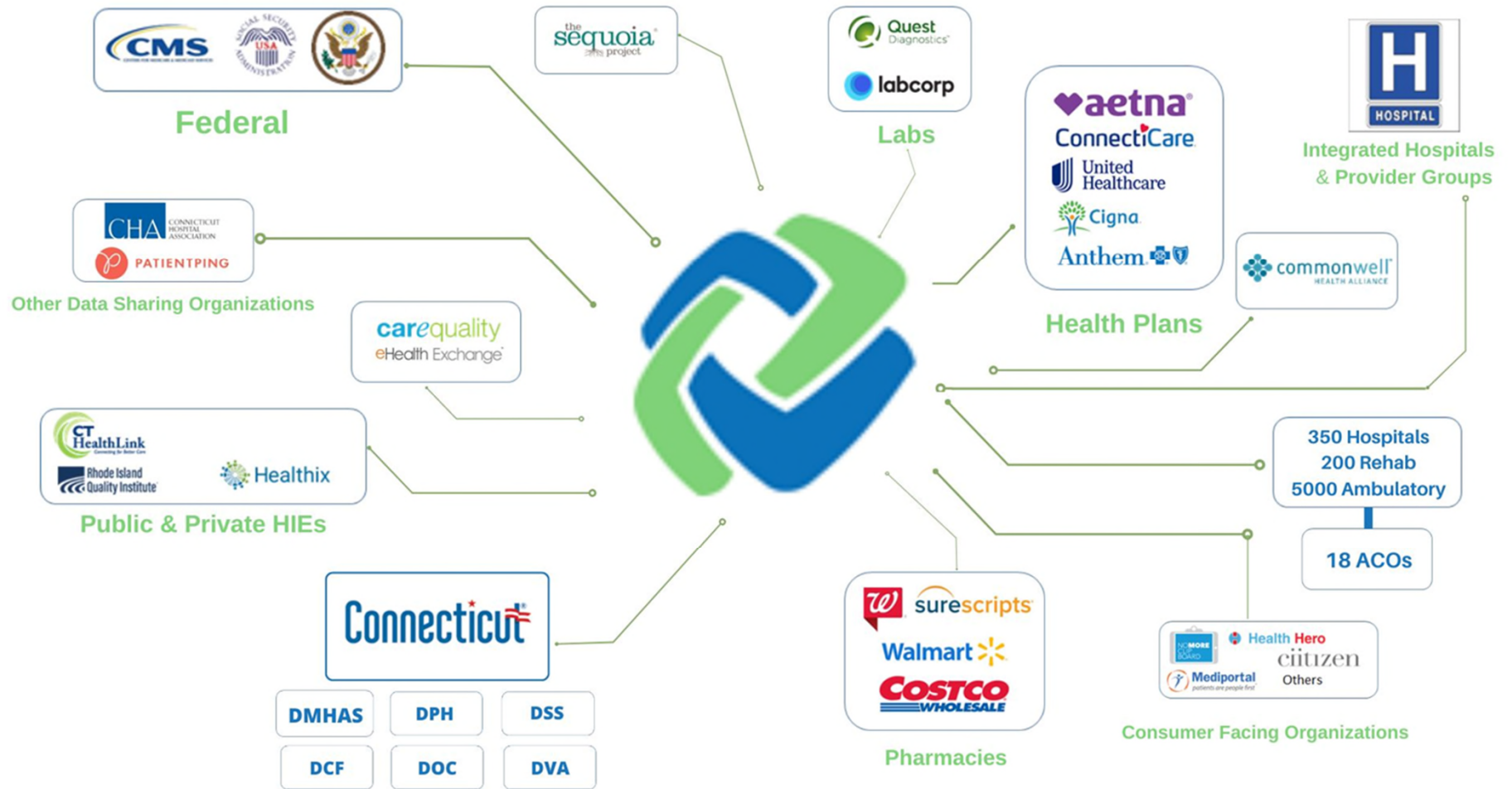
**Connie** is Connecticut's official Health Information Exchange (HIE). An HIE is a safe, confidential way of sharing health information electronically among doctors' offices, hospitals, labs, radiology centers, and other healthcare organizations.

Overseen by an appointed **Board of Directors**, **Connie** was established in 2019 to oversee and drive services to support the exchange of health data in the state of Connecticut. **Connie** is an independent, not-for-profit, neutral and trusted organization.

**Connie** is authorized by **state statute** and our purpose is to create a platform to support health care delivery, quality, safety, and value for Connecticut healthcare organizations, providers, and residents.

# Why Does the State Want an HIE?





## Connie's Mission

- To enhance the health and well-being of Connecticut residents through the provision of health information and technology services. These services empower consumers to make effective health care decisions and promote patient-centered care. They also improve the quality, safety and value of health care, while reducing waste and duplication of services. Connie will support clinical decision-making, keep patient medical health information confidential and secure, and advance the state's public health goals.



# Who are Connie's constituents?

- Connie is required by law to **empower**<sup>1</sup>:
  - Consumers
- Connie is required by law to **assist**<sup>2</sup>:
  - State of Connecticut
  - Health Care Providers and Physicians
  - Insurance Carriers

<sup>1</sup>C.G.S.A. § 17b-59d(a)

<sup>2</sup>C.G.S.A. § 17b-59g(a)

# The Legislative Mandate

- Within one year of commencement of operations, **hospitals** and **labs** shall apply to begin the process of connecting to and participating in the HIE
- Within two years of commencement of operations, any **individual, corporation, facility or institution licensed by the state to provide health care services** shall apply to begin the process of connecting to and participating in the HIE
  - Includes primary care and specialty physician practices, pharmacies, behavioral health providers, and SNFs



# Connecting and Participating

## Connecting to:

- Sharing your patients' demographic and clinical data with Connie
  - Data types and timelines will vary by provider organization type

## Participating in:

- Appropriately accessing data on your patients from Connie
  - Connie Portal or InContext App

## Health Systems



## Medicaid ASOs



## DMHAS Facilities

- Capitol Region Mental Health Center
- Connecticut Mental Health Center
- River Valley Services
- Southeastern Mental Health Authority
- Southwest CT Mental Health System
- Western CT Mental Health Network

## BH Providers

- Advanced Behavioral Health
- BHCare
- Bridges Healthcare
- Community Health Resources
- Community Mental Health Affiliates
- Sound Community Services
- United Services
- Wellmore Behavioral Health

## Others



## HIEs



## IPAs/CINs



## Medical Practices

- 143 Ambulatory Practices
- 13 Long-term/Post Acute
- 5 Radiology Centers
- 1 Urgent Care

## Independent Practices

- First Choice Health Center
- OPTIMUS Health Care
- Southwest Community Health
- Wheeler Clinic

## FQHCs



## Our List of Partners is Growing Every Day

Connie Dashboard: Who's Connected and What They're Sharing

Facility	Parent	Panel	ADT	CCDA	Lab	Rad	Trans
Adult and Pediatric Asthma and Allergy of CT		●					
Advanced Cardiovascular Specialists, P.C.		●	●	●			
Advanced Diagnostic Pain Treatment Centers, PC		●	●	●			
Advanced Orthopedics New England		●					
Allergy, Asthma & Immunology Center, LLC		●	●	●			
Anchor Health Initiative		●	●	●			
Anthony Cicciaglione MD PC		●					
Associated Pulmonologists of Western Connecticut		●					
Auerbach Pediatrics, LLC		●	●	●			
Avanta Clinic LLC		●	●	●			
Avon Medical Professionals		●					
Avon Pediatrics, LLC		●					
Backus Hospital	Hartford Healthcare Corporation	●	●				
Baginski Medical LLC		●					
Baker Pediatrics		●	●	●			
Bay Street Pediatrics		●					
Black Rock Pediatrics		●	●	●			
Bloomfield Foot Specialists, LLC		●					
Bridgeport Hospital	Yale New Haven Health	●	●				
Bridgeport Hospital Milford Campus	Yale New Haven Health	●	●				
Bristol Health		●	●		●	●	●

Page 1 of 1

Microsoft Power BI

<https://connieconnect.org/connected-organizations/>



# The Legal Landscape

- General Rule: State law requires licensed health care providers (facility and individual) to share data with Connie for health information exchange purposes.
  - The only exception is if another state or federal law prohibits such disclosure
- Rules of Thumb:
  - If you are permitted by law to share student health information for treatment purposes without consent currently, then you must share that information with Connie.
  - If a law prohibits you from sharing student health information for treatment purposes without consent currently, then you may share that information with Connie only upon obtaining consent.

# FERPA



# HIPAA



# When HIPAA Applies

- HIPAA applies when FERPA does not
- If the institution is a HIPAA covered entity and provides health care to nonstudents, the health information of the clinic's nonstudent patients is subject to HIPAA
  - Covered entity – does your clinic bill insurance for the care it provides to nonstudents?
  - Institutions that are subject to **both** HIPAA and FERPA and that operate clinics open to staff, or the public, or both (including family members of students) are required to comply with FERPA with respect to the health records of their student patients, and with HIPAA with respect to the health records of their nonstudent patients.

# Connie and HIPAA

- HIPAA Privacy Rule allows sharing without explicit patient consent for Treatment, Payment, Operations, and Public Health purposes
- Connie has implemented an “opt out” consent model
  - Data is sharable for HIPAA-compliant purposes unless the patient explicitly opts out
  - **Exceptions:** Sensitive health information including SUD Part 2 data
- Patients can register opt-out decision at [conniect.org/for-patients/opt-out](https://conniect.org/for-patients/opt-out)
  - One-time opt out for all providers
  - Health data is deleted from the system
  - Can be revoked at any time



## Connie and FERPA

- FERPA applies to most public and private postsecondary institutions and, thus, to the records on students at the campus health clinics of such institutions. These records will be either education records or treatment records under FERPA, both of which are excluded from coverage under the HIPAA Privacy Rule, even if the school is a HIPAA covered entity

# Connie and FERPA

- “**Education records**” are (1) directly related to a student and (2) maintained by an educational agency or institution or by a party acting for the agency or institution.
- “**Treatment records**” are records on a student who is eighteen years of age or older, or is attending an institution of postsecondary education, which are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his professional or paraprofessional capacity, or assisting in that capacity, and which are made, maintained, or used **only in connection with the provision of treatment to the student**, and are not available to anyone other than persons providing such treatment, except that such records can be personally reviewed by a physician or other appropriate professional of the student’s choice.

# Connie and FERPA

- Disclosure Rules

- Treatment Records: A student's treatment records may be shared without consent with health care professionals who are providing treatment to the student, including third-party health care providers, as long as the information is being disclosed only for the purpose of providing treatment to the student
  - Instead of sharing the treatment records through the USPS, FedEx, or your email provider, share them through Connie.
- Education Records: A student's education records may be shared for treatment purposes only (a) with consent, or (b) in a health-related emergency.

## A Connie Checklist

- Begin the connection process
- Confirm if your health center is subject to HIPAA or FERPA by asking:
  - Is the health center run by the institution or is it outsourced to a third-party provider?
  - Care to students only or also nonstudents?
- If FERPA applies, are the health center records education or treatment records?
- Determine if other laws prohibit sharing certain types of health information for treatment purposes absent consent

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## Connie Resources:

- [Website: www.conniect.org](http://www.conniect.org)
- [Email: Info@conniect.org](mailto:Info@conniect.org)