



Use Case Policy: Organ Procurement Organization Access to Clinical Information

Overview

An organ procurement organization (OPO) is designated by the National Organ Transplant Act (42 U.S.C. §273, *et seq.*) to be responsible for promoting organ and tissue donation, identifying potential organ and tissue donors, and recovering and distributing organs and tissue for transplantation, and in some cases, research. OPO are generally tasked with the following responsibilities: Handling donor referral calls from their respectively designated hospitals; guiding families through the donation process; evaluating medical suitability and management of potential donors; working with UNOS to identify matching recipients; coordinating recovery of organs and tissue with surgical teams; and providing non-transplantable organs and tissues for research and education. The Centers for Medicare & Medicaid Services (CMS) designates one OPO per service area. (42 C.F.R. 486, Subpart G). Maryland and the District of Columbia have two OPOs serving the region: one serving the District of Columbia and three adjacent Maryland counties, and one serving the other 21 counties in Maryland.

OPOs are required to perform all of the following and report the resulting information to all receiving OPOs or transplant hospitals: attempt to obtain the deceased donor's medical and behavioral history from one or more individuals familiar with the donor, in order to screen for medical conditions that may affect the decision to use the donated organ; review the deceased donor's medical record; complete a physical examination of the deceased donor, including the donor's vital signs; document in the deceased donor medical record if any of this information is not available and the reason it is not available.

In order to facilitate organ and tissue donation and transplant, OPOs are granted a statutory right to access a potential donor's medical records, without need for written consent or other authorization for such disclosure by the potential donor or the potential donor's next of kin (45 C.F.R §164.512(h)). This privacy exception is also recognized at the state level (MD Code Health General Section 4-305(b)(8)) and District of Columbia (DC Code, Human Health Care and Safety, Section 7-1531.13).

Allowing the OPO access to this donor information is critical to increasing the success rate of transplantation and, importantly, to patient safety. To the extent that CRISP may be able to quickly and comprehensively provide this information, the OPO would be able to accomplish this analysis more accurately and effectively. In cases in which a potential donor is not referred by a hospital, but by a medical examiner or emergency medical services professional, or in cases in which the referring hospital is the only known healthcare provider, access to CRISP may provide vital information that would be otherwise unavailable.

Permitted Purpose Category

For a Public Purpose, as permitted or required 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).

Use Case Description

The OPO is notified of a potential donor from the hospital, EMS, or OCME prompting them to gather information to determine suitability of donation and assist with facilitation donation and transplant. Once the notification is made an identified, authorized user shall have access to CRISP unified landing page to access



information about the potential donor. The OPO employs clinicians and other support staff, a mix of which would have access to CRISP ULP. The OPO Medical Director will provide oversight to staff and ensure that all CRISP policies and procedures are adhered to and will ensure compliance with expectations set out by CRISP in the Use Case.

Opt-Out Applicability


Any patients that opts out of CRISP will be opted out from the ability for the OPO to access their health information.

Eligible Participants

The CRISP portal would be available for use by OPO staff. All users must be verified by an organizational point of contact and must complete the required steps to gain access to the system.

Approval

This Use Case Policy was approved by the Clinical Advisory Board.



Chairperson

12/13/19

Dated