

### ***What are the data sharing implications in a clinic with partial participation?***

In clinics where only some providers are registered for CII/CPAR, it is not always obvious which encounter information will be sent to Alberta Netcare and which will not. It seems intuitive that for CII/CPAR registered providers, information from all of their patient encounters should be shared to Alberta Netcare. This is not necessarily the case. The easiest way to think about this is that within a clinic (or more correctly, within the clinic's EMR) both the Encounter Provider and the Primary Provider(PP) must have given their consent (through CII/CPAR participation) in order for encounter information to be shared to Alberta Netcare. Looking at some examples can help:

1. **Both the Encounter Provider and the Primary Provider are registered for CII/CPAR:**

In this instance both providers have given permission for their information to be shared so the encounter information can be sent to Alberta Netcare. Obviously this applies when a Provider sees one of their own patients.

2. **The Primary Provider is a registered participant in CII/CPAR, but the Encounter Provider is not:**

Here, the Encounter Provider has not given consent for their information to be shared, so it is not.

3. **The Encounter Provider is a registered participant in CII/CPAR, but the Primary Provider is not:**

This example is tricky because it seems like the information should be shared, but in fact it is not. Why? Because the Primary Provider is the custodian of the chart in the clinic's EMR and information cannot be shared without custodial permission. Until the Primary Provider consents to information sharing (by becoming a registered CII/CPAR participant) their chart information cannot be shared.

4. **Neither the Encounter Provider nor the Primary Provider are registered for CII/CPAR:**

This one is easy, the information is not shared.

5. **The Encounter Provider is a registered participant in CII/CPAR, the Primary Provider field is blank:**

The encounter information will be shared.

6. **The Encounter Provider is not a registered participant in CII/CPAR, the Primary Provider field is blank:**

The encounter information will not be shared.

7. **The Encounter Provider is a locum working for a CII/CPAR registered Primary Provider:**

The encounter information will be shared according to the rules above as if the locum were the Primary Provider.

Here is the same information in a table format:

	Encounter Provider Registered?	Primary Provider Registered?	Is the encounter sent to Netcare?	Why?
1	Yes	Yes	Yes	<ul style="list-style-type: none"> <li>Both providers have given permission for the data to be shared</li> </ul>
2	No	Yes	No	<ul style="list-style-type: none"> <li>Even though the Primary Provider has given consent, the encounter provider has not, so the information is not shared</li> </ul>
3	Yes	No	No	<ul style="list-style-type: none"> <li>The Encounter Provider has given consent but the Primary Provider who is the custodian of the chart has not</li> <li>Without custodial consent the information cannot be shared</li> </ul>
4	No	No	No	<ul style="list-style-type: none"> <li>Obviously if neither provider has given consent the information will not be shared</li> </ul>
5	Yes	PP is blank	Yes	<ul style="list-style-type: none"> <li>The Encounter Provider has agreed to share their information</li> </ul>
6	No	PP is blank	No	<ul style="list-style-type: none"> <li>There is no agreement here to share information</li> </ul>
7	Locum may or may not be registered	Yes	Yes	<ul style="list-style-type: none"> <li>As long as the locum is set up properly in the EMR and is working on behalf of a CII/CPAR registered Primary Provider the encounter information will be shared according to the rules above</li> </ul>

***Other Considerations:***

Where there are multiple clinics with a single EMR instance “in the back”, this is further complicated because the primary provider may be located at a different clinic than where the patient visit occurs.

It’s important to know too that in some EMRs the provider who completes the encounter is considered the provider of record. If participating physician A conducts a visit with the patient but non-participating physician B closes the encounter in the EMR, the EMR thinks physician B had the encounter and will not send the visit to Netcare. It is recommended that physicians close their own visits.

***Bottom line:***

While participation in CII/CPAR is voluntary, in clinics where more than the participating primary provider has visits with the patient, the clinic needs to understand the implications of encounters not flowing to Netcare for visits with the patients of non-participating providers.