



**Continuity and Coordination of Care Between Behavioral Health and Primary Care Practitioners
FAQ Sheet**

Continuity and Coordination of Care (COC)

Continuity and coordination between physical and behavioral health is an important aspect in the delivery of quality health care, as behavioral and medical disorders can interact to affect an individual’s health. Harmony Health Plan strongly supports communication/coordination of care and believes coordination is fundamental to patient safety and improved clinical outcomes

Q: What policies and regulations exist regarding client confidentiality and Release of Information?

HIPAA Privacy Rule. The Privacy Rule is located at 45 CFR Part 160 and Subparts A and E of Part 164. The HIPAA Privacy Rule permits uses and disclosures for “*treatment, payment and health care operations*” as well as certain other disclosures without the individual’s prior written authorization. Disclosures not otherwise specifically permitted or required by the HIPAA Privacy Rule must have an authorization that meets certain requirements. With certain exceptions, the HIPAA Privacy Rule generally requires that uses and disclosures of PHI be the minimum necessary for the intended purpose of the use or disclosure.

Q: Can you give examples of what can and cannot be shared among practitioners?

	PCP to BH Practitioner (BHP)	BH Practitioner to PCP
Do share	<ul style="list-style-type: none"> ➤ Acknowledgement of BHP’s: <ul style="list-style-type: none"> • Attempt to coordinate care • Preferred method of communication • Contact information ➤ Treatment of chronic conditions ➤ Medication prescription and management ➤ Results of clinical tests ➤ Serious concerns/changes in mood/affect/thoughts observed during office visits ➤ Concerns/observations regarding medication interactions/side effects prescribed by the BHP ➤ Patient is no longer on your panel 	<ul style="list-style-type: none"> ➤ Admission to and discharge from any BH service. Include date and reason. ➤ Diagnosis (all 5 axes) ➤ Brief treatment plan ➤ Significant change in treatment plan ➤ Concerns/observations regarding medication interactions/side effects prescribed by the PCP ➤ Any medication changes made by the BHP ➤ Results of clinical tests ➤ Progress notes, if deemed necessary for care coordination ➤ Concerns regarding patient risk of harm to self or others
Do <u>not</u> share	<ul style="list-style-type: none"> ➤ Any medical information deemed irrelevant to coordination of care ➤ Any information if the patient signed a “Do Not Release” form 	<ul style="list-style-type: none"> ➤ Psychotherapy notes – documenting or analyzing a conversation during counseling – without written authorization of patient ➤ Any information if the patient signed a “Do Not Release” form