



Connecticut's Health Insurance Marketplace

All-Payer Claims Database
Advisory Group Meeting
November 14, 2013

**Sub-committee
on
Data Privacy and Security**

Data Privacy and Security Subcommittee

1. Dr. Robert Scalettar, *Chair*
2. Robert H. Aseltine, Jr.
3. James D. Iacobellis
4. Matthew C. Katz
5. Kevin Lembo
6. Kimberly Martone
7. Mary Taylor
8. Victoria Veltri
9. Victor Villagra

Policies & Procedures (P&P)

Data Submission Guide (DSG)

Finalizing P&P and DSG – Overview of Public Comments and Final Amendments

APCD Policies and Procedures: Process

- Policies and Procedures drafted in July
- Data Submission Guide (DSG) incorporated by reference
- AHCT Board approved publication of draft Policies and Procedures and DSG for public comment at July 30 Board meeting
- Public comment period began August 13 when notice was published in CT Law Journal, ended September 12
- Several public comments received
- AHCT Board scheduled to vote on approval of Policies and Procedures, DSG at December 5 Board meeting

APCD Policies and Procedures: Public Comment

- Definitions: Member
 - Includes all insured/covered Connecticut residents
 - Also includes population necessary for risk adjustment
- Definitions: Historic Data
 - Data history will be for the period - 1/1/2011 - 12/31/2013
- Definitions: Collection of Denied Claims Data
 - Only paid claims data will be collected in 2014
 - Issue can be revisited next year

Collection of Denied Claims

- Collection issue – Denials can be collected in a variety of forms. The manner in which denial data is submitted to the APCD impacts the level of development and resources needed to produce meaningful and accurate information.
 - Aggregate Level Denial Data
 - Transactional Denied Data (HIPAA 835 Standard)
 - Transactional Denied Data (Carrier Standard)
- Interpretation issue – Complexity of claim denials, variation across payers, and concern with accurate interpretation of denial data leads most APCDs to avoid the collection of denials.
- None of the existing APCDs except for Utah collects denied claims. Utah is re-issuing its RFP for APCD services. State of Vermont collects aggregate level denied claims.
- Inclusion of denied claims for submission in the P&P can delay the whole process considerably due to risk of interpretation for substantive change

APCD Policies and Procedures: Public Comment

- Reporting Requirements: Subcontractor Data
 - Carriers should submit data from carved-out benefits subcontractors
- Reporting Entities' Data Submission Schedule
 - Test files – 150 days, historic files – 60 days
 - Dental data will not be collected in first year
- Annual Registration
 - Registration date for 2014 will change from 10/1/13 to 1/10/14

APCD Policies and Procedures: Public Comment

- Non-Compliance and Penalties
 - Administrator may audit reporting entities to monitor compliance
 - Administrator will work with reporting entities to address non-compliance and impose penalties if necessary
- Data Utilization and Disclosure
 - New set of Policies and Procedures on data utilization and disclosure are being drafted and will be released in 2014
- Privacy and Confidentiality
 - Privacy and confidentiality taken very seriously
 - APCD will be consistent with highest standards, including HIPAA and applicable federal and state laws

Data Submission Guide: Public Comment

- **Data Submission Requirements**

- Health plan documentation requirements will focus primarily on:
 - Submission of home grown values
 - Claims adjudication systems & processes
 - Consumption of enrollment, disenrollment, and changes in benefit
 - Strategic variables
- Eligibility information to be submitted using a rolling period methodology instead of a point in time approach.

Data Submission Guide: Public Comment

- **Technical Specifications and Data Formats**

- Additional safeguards added to file specifications to improve data quality checks and data submission efficiency for all parties involved.
- CT's data standard will align with the majority of existing APCDs. ASC X12 PACDR standard will not meet CT requirements at this point in time.

- **Data Quality Requirements**

- Data thresholds regarding completion based on other state experiences. The goal is to provide a benchmark for health plans.
- Greater detail to code standards and reference documentation have been added to the data submission guide.

APCD Policies and Procedures: Impact of Delay

- Substantive amendments to Policies and Procedures will require re-posting for public comment
- This could delay the Board's approval of Policies and Procedures by two to three months
- Data submission schedule does not begin until Policies and Procedures receive final approval from Board
- Current data submission schedule (Board approval in December) would allow APCD to produce reports/consumer decision support by fall 2014, in time for enrollment for 2015 plans
- Potential three month delay would push reports back to early 2015
- Additional Policies and Procedures will be issued in 2014, and there will be opportunities to amend the initial set of Policies and Procedures at that point

Projected Timeline for APCD's Data Submissions

Data Submission Timeline

