



## All Payer Claims Database Advisory Group Meeting Meeting Minutes

Date: October 3, 2013  
Time: 9:00 a.m. EST  
Location: Legislative Office Building, Hartford, CT, Room 1D

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### **Members Present**

Kevin Counihan (left the meeting at 9:40 a.m.), Dean Myshrall, Jean Rexford, Demian Fontanella for Vicki Veltri, Matt Katz, Mary Taylor, Bob Scalettar, Barbara Parks Wolf for Ben Barnes, Mary Ellen Breault for Thomas Leonardi, Kim Martone, Josh Wojcik for Kevin Lembo, Rob Aseltine, Michael Michaud for Pat Rehmer, Victor Villagra, Bob Tessier, Mary Alice Lee

### **Members Absent**

Jewel Mullen, Tom Woodruff

### **Members by Telephone**

Jim Iacobellis, Rod Bremby

### **Other Participants**

Access Health CT: Tamim Ahmed, Matt Salner, Robert Blundo, Jim Wadleigh

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#### **I. Call to Order and Introductions**

Kevin Counihan called the meeting to order at 9:02 a.m.

#### **II. Public Comment**

There was no public comment.

#### **III. Approval of June 25, 2013 Meeting Minutes**

Matt Katz raised the issue that a discussion around capturing race and ethnicity data was not captured in the previous meeting minutes. Mr. Katz stated that the June minutes cannot be approved without the substantive discussion around health equity, race and ethnicity capture which was not reflected in the minutes. Mary Taylor recommended deferring approval of the June minutes to the next meeting since this element is in the Data Submission Guide (DSG). It was agreed that staff would review and make adjustments to the minutes. Approval of the minutes of the June 25 meeting was tabled until the next meeting.

**IV. CEO / ED Update**

Mr. Counihan provided a brief Exchange enrollment update and overview of the agenda. Mr. Counihan indicated that the contract with Freedman Healthcare has been terminated.

**V. Data Management – Outsourcing vs. Insourcing**

Tamim Ahmed provided a brief overview of the meeting objectives. Mr. Ahmed provided a brief background of the objective of the APCD indicating that three to five years of data will be retained for analysis which will include PHI data. The APCD team will be working diligently over the next few months to address data governance and data-use issues.

Mr. Ahmed provided a presentation overview outlining the advantages and disadvantages of outsourcing versus insourcing the data management functions of the APCD. Mr. Ahmed indicated that if the decision were made to insource data management, the APCD would be partnering with the state Bureau of Enterprise Systems and Technology (BEST). Mr. Katz asked a question about programming staff needed in order to keep the infrastructure in house. Discussion ensued.

Ms. Taylor asked whether the APCD's expenses would be paid in part by fees charged for limited data sets, and if so, what percentage of total revenues such fees would comprise. Mr. Ahmed stated that in the third year of operation, data use fees could make up as much as fifty percent of the budget. Mr. Ahmed indicated that the availability of limited data sets, and fees charged for them, depend on the data use and governance rules which will be issued in 2014. Discussion ensued.

Mr. Ahmed provided a comparison overview of the budget for insourcing versus outsourcing. Mr. Katz asked a question about budget allocations for staff, software, and other expenses.

Mr. Ahmed discussed the data import and validation services slide and the HIX infrastructure integration opportunity. Ms. Taylor mentioned HIPAA concerns related to data. Mr. Ahmed stated that he will look into this. Mr. Ahmed discussed scrambling data and data de-identification levels. Mr. Ahmed stated that limited data sets will be created based on requests from researchers. Once a contract is signed with the researcher, there will be a business associate relationship. Data will not be released outside the terms of the contract.

Ms. Taylor initiated a discussion of protection of trade secrets and proprietary information from carriers. Bob Tessier indicated that there is a huge public interest in consumers accessing provider pricing information. There is a broad base of support for ensuring that consumers have access to this information. Ms. Taylor suggested that there needs to be further discussion of the matter. Mr. Ahmed indicated that these would be the most important elements to address. Advisory Group members reiterated the need to have a longer discussion on this matter. Mr. Ahmed stated that this will happen.

Mr. Ahmed provided an overview of the timeline for APCD insourced development. Dean Myshrall of BEST talked about what is needed from the APCD team in order to implement. Mr. Ahmed indicated that all data management specifications should be provided to BEST by the end of October. Mr. Ahmed stated that infrastructure design is not going to be very complex. An application server and data server would need to be purchased if not provided by BEST. The group discussed test servers, architecture needs, and environments which will be put in place.

**VI. Public Comments on Policy & Procedures**

Matt Salner provided a summary of the public comments received in response to the draft APCD policies and procedures. Mr. Salner announced that several comments were received and indicated that the AHCT Board will be asked to approve the policies and procedures during the upcoming board meeting. Mr. Salner indicated that a final report of the comments will be issued to the group. Mr. Tessier asked if the comments will be made available

online. Mr. Salner indicated that the final report will be posted online and anyone is welcome to access the comments.

Mr. Salner stated that only paid claims data will be collected by the APCD due to the complexity of collecting denied claims data. Demian Fontanella remarked that denied claims data should be recorded as it impacts the value of the data analytics and is critical for assessing disparities. Mr. Fontanella recommended that this topic be revisited soon than later. Mr. Katz expressed agreement. A discussion of the collection of denials data interpretation of the data ensued. Rob Blundo stated that this could potentially be built out in the future. Mr. Fontanella made the recommendation of building the APCD out to include collection of this data from the start. Ms. Taylor mentioned the ambitious timeline with regard to the carriers. Mr. Blundo stated that the team has been having discussions with the carriers and are aware of the concern with regard to the tight timeline. Mr. Blundo indicated that the carriers have already begun working on programming for data submission.

Mary Alice Lee asked about the required schedule for data submission from reporting entities. Mr. Blundo indicated that reporting entities will be required to submit data on a monthly basis. Ms. Lee asked about the decision to not collect dental claims data during the first year. Mr. Salner indicated that this data would be collected in the future and noted that the AHCT Board will have the final say of the approval of these policies and procedures. Mr. Katz initiated a discussion of the role of the advisory board indicating that the group did not make a recommendation around collecting dental data. Mr. Blundo stated that in terms of requiring dental data, the team wants to build the database by focusing on medical claims first, noting that these were technical compromises. Discussion ensued around the role of the committee. Members indicated an interest in better understanding the relationship between the Advisory Group and the AHCT Board.

Mr. Salner continued with his presentation providing an overview of comments made around non-compliance and penalties, data utilization and disclosure, and privacy and confidentiality. He reiterated that additional policies and procedures regarding data utilization and disclosure would be promulgated in 2014. Ms. Taylor recommended that the APCD be consistent with the HIPAA standards for privacy. Mr. Katz agreed. Mr. Tessier remarked that the comments will be shared with the AHCT Board prior to October 17<sup>th</sup> Board meeting. Mr. Tessier requested clarification around the original draft of the policies and procedures approved by the Board for publication. Mr. Tessier suggested that a smaller working group of Advisory Group members be established in order to draft the new policies and procedures, and that the draft then be brought to the full Advisory Group for review and approval.

#### **VII. Public Comments on Data Submission Guide (DSG)**

Mr. Blundo, Data Manager, provided a summary of the comments received on the DSG, the technical document that isolates which fields should be submitted, the format it should be submitted in and references the types of standards that should be used. He stated a wide variety of comments were received which had been bucketed into 3 groups: General Requirements, Technical Specifications and Data Formats, and Data Quality Requirements.

##### **General Requirements**

Health plans submitted several comments requesting more information about scope and need for documentation. Mr. Blundo indicated that there will be four areas/instances where documentation will be required by carriers to a varying degree: 1) Submission of homegrown values. Each plan has a separate data system or structure in which they house their data. Mr. Blundo indicated a standard process to submit home-grown values will be developed for plans to submit this information. 2) Communication and description regarding the carrier's claims adjudication systems and its impact on submitted claims. 3) Detail on the health plans enrollment and benefit structures. The

team will work with the carriers to consume this information in a non-burdensome way. 4) The APCD reserves the right for additional discussion/documentation for fields which are critical to the operation of the APCD.

**Technical Specifications and Data Format**

Several comments were received about the requirement of a separate control total file which ensures that all data is correctly received. A header trailer record method will be included in the updated DSG which will ensure valid data submission, and an efficient process for carriers and the APCD. A comment was also received regarding conformity to the ASC X12 Standard. Mr. Blundo stated the X12 format is missing components that CT needs for its APCD. As components are added to it and it aligns more with CT's needs, the team will be receptive to converting to X12 in the future. Ms. Taylor expressed disappointment that the standard will not be used by CT. Ms. Taylor recommended using the X12 definitions, suggested attending the X12 meetings and attempt to make the X12 usable. Mr. Katz asked which components are missing from the X12. Mr. Blundo stated that there was a variety of non-existing components and he would provide a list to Mr. Katz. Mr. Blundo also indicated that not all carriers are able to provide X12 data at this point in time. This would pose a large challenge in CT's attempt to create a functioning APCD within the timeline.

**Data Quality Requirements**

Mr. Blundo provided a brief summary of comments received regarding the data quality components of the DSG. One comment was regarding the enforcement on data thresholds. He specified that the current benchmark are derived from other state's findings, however as CT specific data was consumed, the benchmarks would be re-evaluated.

Mr. Blundo also discussed a variety of technical comments regarding references, data content, and general questions on how the DSG was constructed. He stated the ACPD was taking steps to make the DSG more comprehensive and easier for carriers to work with. He indicated work was being performed on standardization of codes, creation of a FAQ within the document, and implementation of a variety of minor fixes within the guide.

Mr. Blundo reported the major milestones to APCD progress:

CT APCD to release updated DSG to health plans on October	October 4-15, 2013
P&P finalized and released by AHCT	October 17, 2013
Annual registration by health plans completed	November 15, 2013
Test Data Submission deadline	March 3, 2014
Historical File Submission Deadline	May 15, 2014
YTD Files Submission Deadline	July 1, 2014
Monthly File Submission Start Month	July 31, 2014

Ms. Lee asked if the DSG requirements apply to DSS and Medicaid. Mr. Ahmed stated that a next task is to delve into the Medicaid data and see if an MOA can be established between DSS and the APCD, as well as between CMS and the APCD for Medicare data. Discussion ensued.

**VIII. Next Steps**

Mr. Katz initiated a brief discussion around the timeline and approval process of the policies and procedures. Mr. Ahmed stated that most of the changes will be in the technical component and will be minimal. In 2014, an additional set of policies and procedures will be promulgated, and at that point there will be an opportunity to incorporate changes such as the collection of denied claims data. Mr. Ahmed reiterated the need to move ahead now and consider these changes in the future.

Mr. Katz expressed concern regarding the process of making recommendations to the AHCT Board.

**IX. Future Meetings**

Mr. Ahmed indicated that dates will be sent to the group regarding new date. Ms. Rexford welcomed members to attend a roundtable discussion on the APCD.

**X. Adjournment**

The meeting was adjourned at 11:04 a.m.