



Connecticut's Health Insurance Marketplace

All-Payer Claims Database Advisory Group Meeting

April 10, 2014

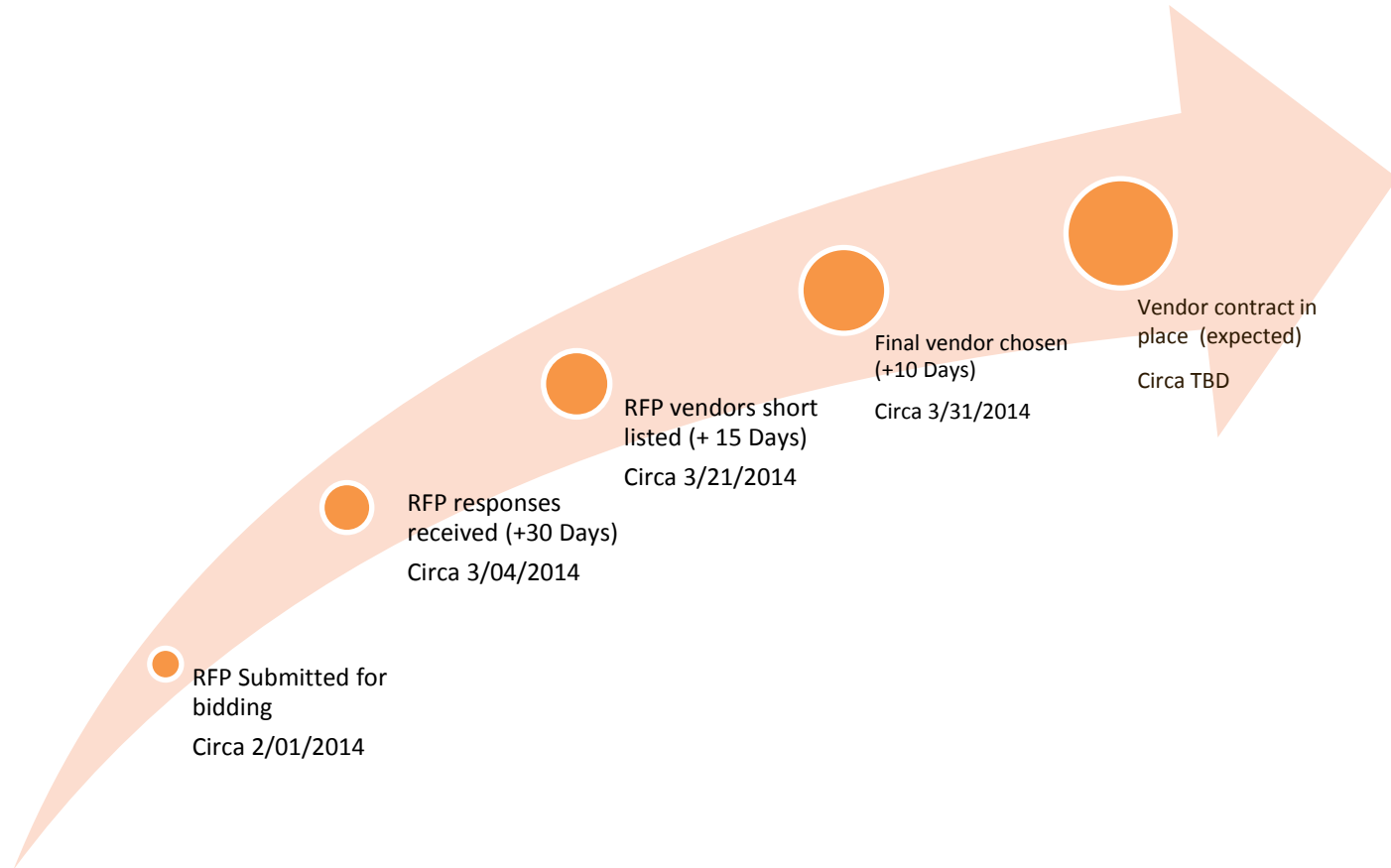
Presentation Overview

- Overview of APCD – CEO/ED Update
- RFP Process Status, Timeline, Challenges
- Member Opt-out from APCD
- Legal Issues Concerning Various Aspects of APCD
- Status of Subcommittees
- Next Steps
- Future Meetings

IV. CEO / ED Update

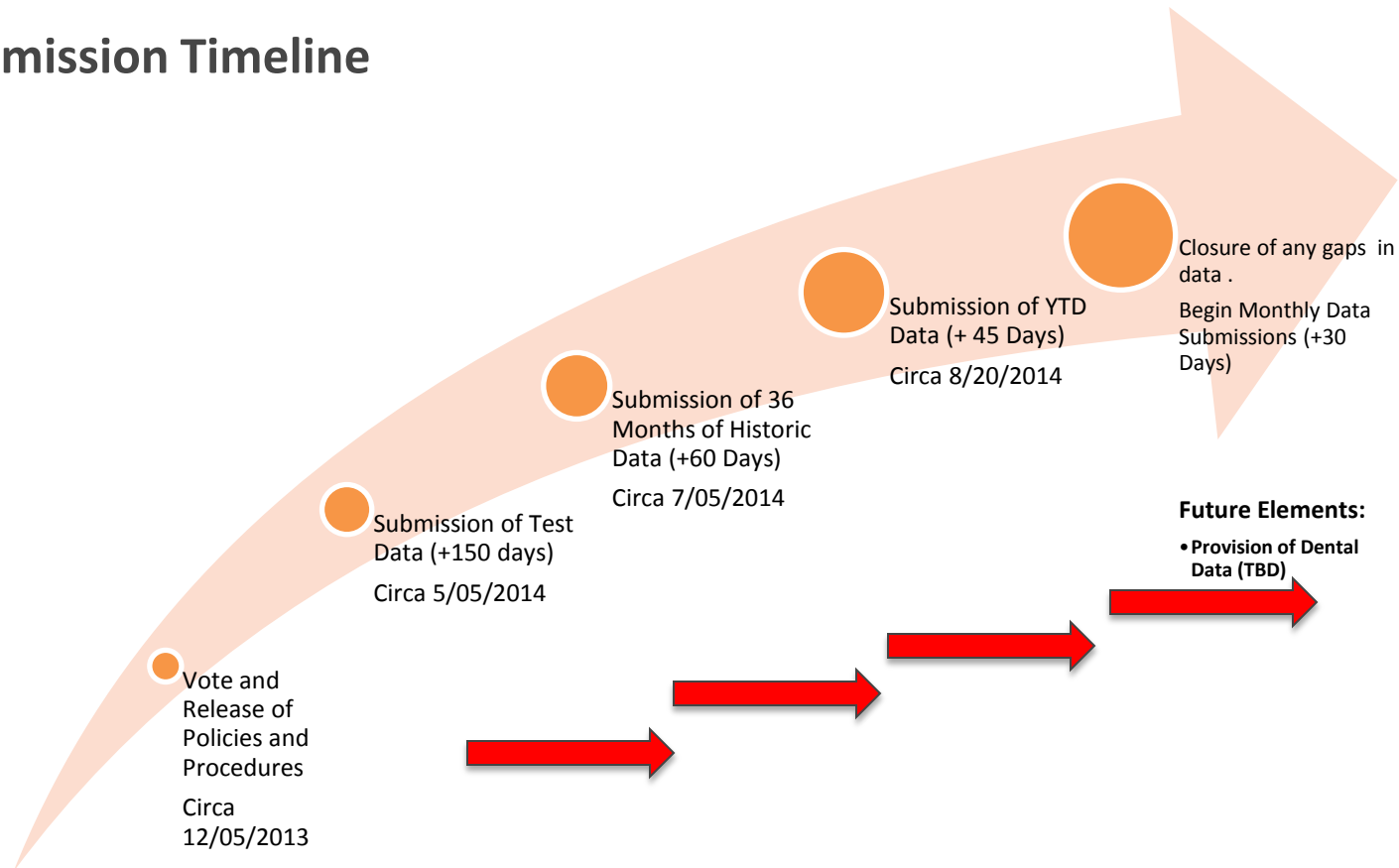
- Last two months has been extremely hectic for Access Health Analytics (AHA) due to
 - Enrollment support for AHCT, and AHA involvement in generating reports for the Federal and internal audiences
 - Conducting procurement process for an APCD data & analytics vendor
- Introducing Christen Orticari, hired as an Analyst at AHA in March, 2014
- Based on Advisory Group's feedback from last meeting, especially involving legal issues, AHA has retained the legal services of Attorney Joan Feldman and her Associates from the law firm of Shipman & Goodwin, Hartford, CT.
- Many of the questions were legal and will be addressed by Attorney Feldman and her Associate today.
- RFP evaluation process for selecting APCD vendor is complete; it is now at the contracting stage. Legal advise restricts us from announcing name of the prospective vendor publicly, not until the contract is in place. Special thanks to the Advisory Group members, Bob Tessier and Dean Myshrall, for helping us through the process.

V. RFP Process Status, Timeline, Challenges



V. RFP Process Status, Timeline, Challenges

Data Submission Timeline



VI: Member Opt-out from APCD

1. Current legislation does not allow for member opt-out.
2. Importance of collecting 100% data for public health consideration
3. Current legislation allows for only deidentified data for distribution, thus minimizing any risks of patients' privacy being compromised
4. Self-selections by vulnerable sub-population of withholding data will be detrimental for public health surveillance, planning and actions
5. Public health initiatives where intervention and control groups measure 'true effect' of intervention compromised by opt-out feature
6. Administering difficulties for accommodating opt-out will limit financial viability of APCD, especially its scope will be reduced considerably

VI: Member Opt-out from APCD (cont.)

7. Biases may be introduced from notification source of patient opt-out feature. For example, hard to quantify number and composition of patients opting out by receiving such information from providers versus payers
8. Allowing for opt-out will inhibit efficiency measures for providers and/or for treatments if patients sensitive to certain chronic or acute conditions prefer to remain anonymous
9. None of the functional APCDs allow for member opt-out; Rhode Island is the only one with this feature but this APCD is not yet functional

VII: Legal Issues Concerning APCD

Legal Status of APCD

1. Is the APCD a “covered entity” under HIPAA?
2. Is the APCD a “business associate” under HIPAA?
3. What information will the APCD request from Reporting Entities?
4. Who owns the information received from Reporting Entities and maintained by the APCD?

VII: Legal Issues Concerning APCD

Data Privacy

1. Is the APCD subject to HIPAA at all?
2. Are there state statutory privacy laws that apply to the APCD?
3. What obligations does the APCD have to maintain the privacy and security of the information it receives from payers?

VII: Legal Issues Concerning APCD

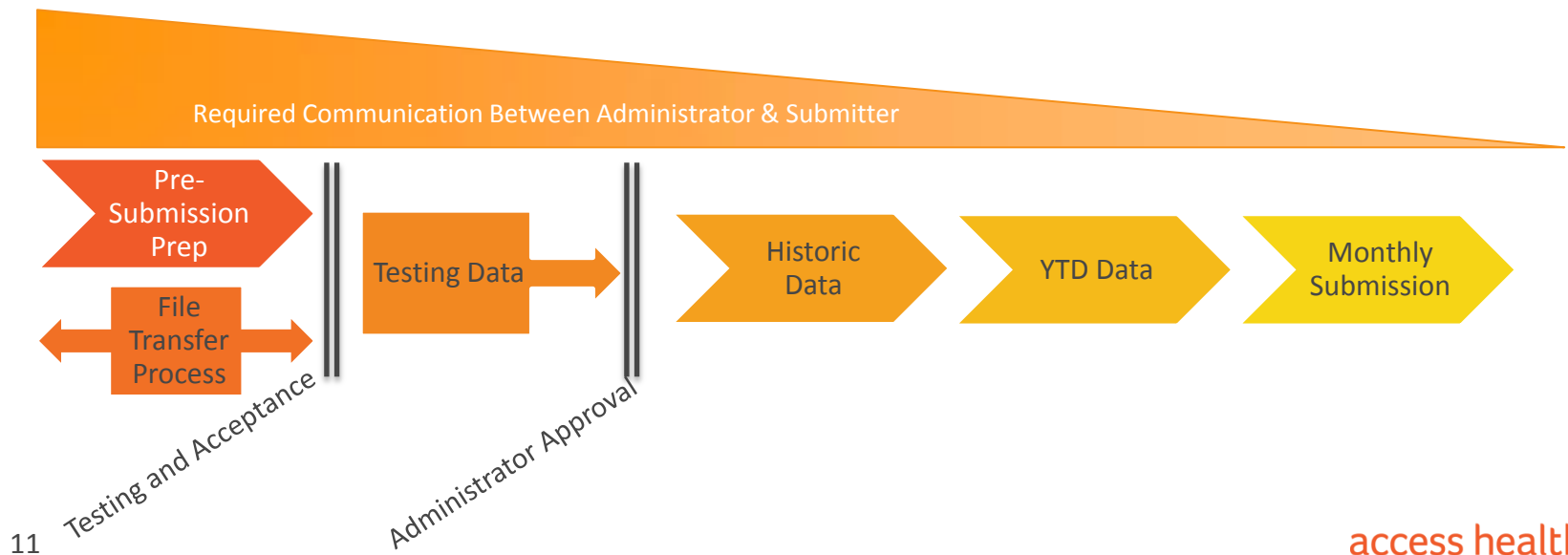
Data Disclosures

1. To which third parties will the APCD disclose Data?
2. What type of information will be disclosed by the APCD to third parties?
3. What will be the APCD's process for evaluating requests for disclosures and making approved disclosures?
4. What type of information will consumers and the general public have access to?

VIII: Status Update on Data Submission

Data Submitter Engagement Process:

- Reporting Entity registration deadline was January 10, 2014.
- Reporting Entities beginning to code data extracts per DSG and P&P requirements
- AHA tools to support submission process:
 - DSG Comparisons
 - Ticket/ Issue Logs
 - Submitter FAQs
 - Shared Work Sites With Submitters



VIII: Status Update on Data Submission

Data Submission Challenges

- **Timing** - Data submission timeline (per P&P) and data management vendor contract negotiations are occurring in parallel
- **Planning** - Several data submission clarifications/directives are contingent on vendor participation
- **Data Delivery** - Creation of a vehicle for submitters to transfer, encrypt, and load data dependent on vendor involvement
- **Data Validation** – Data acceptance confirmation during the testing period will vary from submitter to submitter. P&P language indicates that submission of any non-test data is contingent on approval of test data from the administrator
- **Data Intake Prioritization** – There will be numerous submitters to be on-boarded. Prioritization plan for on-boarding those submitters to be developed with vendor.

VIII: Status Update on Data Submission

Submitter Engagement Progress:

- **Major Medical** - Seven entities currently engaged in submission communications
- **Pharmacy Benefit Managers** - Two PBMs above the population threshold have registered. One outstanding registrant
- **Medicare** –ResDAC has provided approval and quote for acquiring CT Medicare data
- **Medicaid** – Discussions with DSS are ongoing. Meeting scheduled to discuss potential use cases and logistics.

Currently Engaged in Planning		To Be Engaged	
Aetna	United Health Care	Caremark	Medicaid
Cigna	Wellpoint	Express Scripts	
Connecticare	WellCare Health Plans	Catamaran Rx	
Harvard Pilgrim		Medicare	

IX. Status of Subcommittees

Policy & Procedures Enhancement Subcommittee Update

2/21 Meeting Discussion Topics:

1. Discussed Potential For Acquisition of Denied Claims Data In The Future
2. Examined Dental Data Planning and Acquisition Process

Action Items For Next Enhancements Subcommittee Meeting (next meeting date is being finalized):

- Subcommittee to review the available CARC and RARC codes in future meetings to ensure their values meet the goals of the subcommittee.
- Subcommittee to create a list of use cases for denied claims.
- Begin discussion with dental stake holders to determine if data within the DSG aligns with their needs and expectations
- Deliver modified language to the committee to promote the incorporation of dental claims data by mid-2015

IX. Status of Subcommittees

Data Privacy & Security Subcommittee Update

1/23 Meeting Discussion Topics:

1. Reviewed Public Commentary Regarding Privacy, Security, and Confidentiality (PSC)
2. Created, Circulated, and Reviewed Supplemental Information Packets
3. Proposed Subcommittee Charter Language to Clarify Goals and Objectives of the PSC Committee

4/1 Meeting Discussion Topics:

1. Reviewed Legal Issues Concerning Data Privacy and Security
2. Discussed Initial DUA Research Findings and Reviewed a Data Release Use Case (CO)

IX. Status of Subcommittees

High Level Action Items/Goals for Future Meetings:

- Determine data privacy protocol for APCD data based on industry standards and best practices.

- Continue to utilize existing knowledge and processes from other states and institutions to inform and guide subcommittee. Examples include:
 - » Provision of Helpful Links and Resources (Circulated on 1/23)
 - » Overview of Public Commentary Regarding PSC Concerns (Circulated on 1/23)
 - » Glossary of Privacy/Security Terminology (Circulated 1/23)
 - » Data Release Processes and Procedures in Existing APCDs (In Progress)
 - » Data Use Agreement (DUA) Structure and Provisions in Existing APCDS (In Progress)

- Leverage newly added legal counsel to understand and outline APCD requirements and boundaries in greater depth.

Future Meetings

Access Health Analytics

All Payer Claims Database – 2014 Meetings Schedule

All meetings are held on the second Thursday of each month from 9:00 – 11:00 a.m. EST.
(unless otherwise indicated)

*Session - indicates that the meeting will not be held at the LOB due to Legislative Session.

Date	Venue	Venue
January 9, 2014	9:00 – 11:00 AM	LOB, Room 1A
March 13 April 10, 2014	9:00 – 11:00 AM	The Hartford Hilton, Hartford
May 8, 2014	9:00 – 11:00 AM	LOB, Room tbd
July 10, 2014	9:00 – 11:00 AM	LOB, Room tbd
September 11, 2014	9:00 – 11:00 AM	LOB, Room tbd
November 13, 2014	9:00 – 11:00 AM	LOB, Room tbd