

Vermont's APCD (VHCURES)

Data Release Overview

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VHCURES

Vermont Health Care Uniform Reporting and Evaluation System



Who?	Vermont residents with health insurance coverage by Vermont Medicaid, Medicare, and commercial health insurance
What?	Medical and pharmaceutical claims Member enrollment Provider data
Where?	Data are securely stored by vendor under SOV contract and by authorized users
When?	Data from calendar year 2007 to present
Why?	To support the GMCB's regulatory duties, provide resource to researchers, the public, and other authorized users

Current VHCURES Authorized Users



Vermont Department of Health	Utilization patterns and trends of chronic diseases
Department of Vermont Health Access	Blueprint for Health, payment reform
VT Department of Disabilities, Aging and Independent Living	Outcome and performance measures for programs and services
VT Legislative Joint Fiscal Office	Legislative Task Force on Affordable, Accessible Health Care
VT Department of Financial Regulation	Essential Health Benefit plans, wait time investigation
University of Vermont College of Medicine	Health services analysis
NORC	Evaluation of Vermont's All-Payer Model
RAND	National Hospital Price Transparent Study (Round 4)
Archway Health Advisors	Development of episodic payments

VHCURES Oversight



18 V.S.A. § 9410

GMCB Rules

8.000

Data Submission

9.000

Data Release

Data Reporting
Manuals

Data Use and
Disclosure
Manual

GMCB Data Governance Council

Data Governance
and Stewardship
Charter

Data Stewardship
Principles &
Policies

Data Governance Concerns



The GMCB is responsible for a broad set of data management concerns. While not intended as an all-encompassing inventory, these concerns can generally be attributed to four categories:

Risk Management

Implementing and enforcing the most appropriate data privacy and security standards and practices.

Data Quality

Establishing data stewardship to promote the highest possible quality of GMCB's data resources.

Program Sustainability

Evaluating opportunities to optimize sustainability and revenue for GMCB's data stewardship program.

Data Release

Supporting clear processes for the evaluation of data requests and the release of data to Vermont State Agencies and Instrumentalities, and to non-State entities.

Data Stewardship Principles and Policies



- Principle 1: **Implementing and enforcing the most appropriate data privacy and security standards and practices.**
- Policy 1.1: The highest priority for GMCB data governance is the protection of individuals' privacy and their protected health information.

Data Stewardship Principles and Policies



- Principle 2: Establishing data stewardship to promote the highest possible quality of GMCB's data resources.
- Policy 2.1: GMCB data will be maintained in a manner that maximizes transparency.
- Policy 2.2: Data quality will be monitored and continuously improved.
- Policy 2.3: GMCB data will support timely, consistent, and actionable analyses.

Data Stewardship Principles and Policies



- Principle 3: Evaluating opportunities to optimize sustainability and revenue for GMCB's data stewardship program.
- Policy 3.1: GMCB will strive for sustainability, relevance, and accessibility of its data resources.

Data Stewardship Principles and Policies



- **Principle 4:** Supporting clear processes for the evaluation of data requests and the release of data to Vermont State Agencies and Instrumentalities, and to non-State entities.
- **Policy 4.1:** The use of GMCB data resources will support GMCB's mission and mandates and comply with established conditions of release.
- **Policy 4.2:** GMCB data resources are used to support the study of health and health services that serves the public interest and benefits Vermonters.

Data Governance Council



- Currently composed of seven voting members who are data contributors, data users, technical experts, or policy leaders:
 - 2 GMCB Staff
 - 1 GMCB Board member
 - 2 State agency representatives
 - 2 non-state entity representatives
- Meets approximately every other month in an open, public meeting.
- Meetings are announced on the Board's calendar of events and meeting information for the Data Governance Council is publicly available.

Data Use and Disclosure Manual



- VHCURES Data Use and Disclosure Manual
- This manual specifies the procedures for:
 - submission and review of applications for data from the VHCURES data set,
 - limitations on the availability of such data,
 - requirements that persons seeking or receiving such data must comply with to ensure that the privacy and security of the data is maintained.

Authorized Data Release



- VHCURES data is available to users who meet the requirements of the data release process.
- Vermont State entities may apply for and secure a “broad use” data use agreement with access to commercial, Medicaid and Medicare data.
- Non-state entities may apply to gain access to the database, but only for a limited use data set, which does not include access to Medicare data.
- GMCB does not collect fees. State entities are not individually charged access fees, however, under contract, non-state researchers pay our APCD vendor a set fee for a customized data extract.

Application Process, Generally



Secure Products



Product	Privacy	Description
Secure Analytic Enclave	Private, requires a data use agreement	Secure, cloud-based environment where authorized users can access tools and data to perform analyses and reporting. Managed by Onpoint Health Data.
Consolidated Extract	Private, requires a data use agreement	Most detailed VHCURES data set, includes data fields as submitted by payers as well as Onpoint value-added tables and fields. Effective use of the consolidated extract requires technical knowledge of claims data as well as sufficient database management infrastructure and expertise.
Analytic Files	Private, requires a data use agreement	Files designed to reduce the technical knowledge that users need in order to derive meaningful information from VHCURES, while preserving sufficient detail to allow for flexible and meaningful analysis. Includes commercial and Medicaid data as well as an alternate version that includes Medicare data (users will be able to request and receive Medicare data only when permitted by data release regulations).
Public Reports	Available to the Public	Reports that provide statistics describing the Vermont health care system as reported to VHCURES. Data are aggregated and source data are not released. Data are derived from VHCURES and therefore reflect only data submitted to VHCURES.

Privacy and Security Protections



Type of Protection	Description
Legislative	<p>Statute requires that the Board protect the privacy of this data; it incorporates protections from HIPAA and, notwithstanding HIPAA, prohibits public disclosure of any data that contain direct personal identifiers (18 V.S.A. § 9410)</p> <p>Security Breach Notice Act (9 VSA § 2435) Social Security Number Protection Act (9 VSA § 2440) Confidentiality of prescription information (18 VSA § 4631)</p>
Security standards and certifications	<p>HITRUST Certification</p> <p>HIPAA and CMS Qualified Entity Certification Program security standard-compliant</p> <p>Service Organization Center 3 (SOC-3) Certification</p> <p>National Institute of Standard and Technology (NIST) security guidance-compliant</p> <p>Certified Information Systems Security Professional (CISSP)</p>

Privacy and Security Protections



Type of Protection	Description
Data management	Data encrypted at rest and in motion
	Regular third-party penetration test and firewall reviews
	Real-time firewall and system monitoring
	Weekly vulnerability scans
	Network tiered and segmented to reduce vulnerability
	24x7 monitoring and alerting
Data release	Secure File Transfer Protocol (SFTP) with PGP encryption
	Application process to review intended use is authorized
	Approved applicants complete an enforceable Data Use Agreement (DUA) with accompanying affidavits for all users
	Data released in a deidentified format, as required by HIPAA
	GMCB performs prepublication review to ensure published results compliant with DUA
	Attestation of data destruction upon termination of DUA

QUESTIONS?