

APCD Data Privacy and Security Subcommittee

Meeting Minutes

MEETING DATE	MEETING TIME	Location
June 14th, 2019	9:00AM – 10:30AM	195 Farmington Ave Farmington, CT 06032

SUBCOMMITTEE MEMBERS				
Robert Scalettar	x	Ted Doolittle	x	Matthew Katz
Joshua Wojcik	x	Pat Checko	x	Dr. Victor Villagra
James Iacobellis	x	Bernie Inskeep	x	Krista Cattanach
Adam Prizio	x			
SUPPORTING LEADERSHIP				
Allan Hackney, OHS		Carol Robinson, CedarBridge		Mark Hetz, CedarBridge x
Rob Blundo, AccessHealth CT		Michael Matthews, CedarBridge	x	Dawn Bonder, CedarBridge x
Tina Kumar, OHS	x	Chris Robinson, CedarBridge		Sheetal Shah, CedarBridge x

Minutes			
	Topic	Responsible Party	Time
1.	Welcome and Call to Order	Dr. Scalettar	9:00 AM
	Dr. Scalettar welcomed the members. The subcommittee accepted the meeting minutes.		
2.	Public Comment	Attendees	9:15 AM
	<p>Dr. Susan Israel asked if OHS had the intention to hire other vendors who may be able to see identified data. Additionally, she made specific comments related to content in Section 5 of the Privacy Policy. Lastly, she asked if there was an intent to link APCD data with other internal data sets within OHS such as electronic medical record or eCQM data.</p> <p>Dr. Scalettar thanked Susan Israel for her comments and questions. He indicated they were clear on her questions and this will be part of the discussion.</p>		
3.	Massachusetts APCD Interview	CedarBridge Group	9:20 AM
	<p>Dawn Bonder indicated that MA is exploring the use of substance use disorder data. They are working with a vendor to ensure data is statistically de-identified pursuant to HIPAA.</p> <p>Rob Blundo provided more clarity on how data is de-identified under HIPAA standards. Pat Checko asked how this applied to limited data sets. Rob Blundo indicated that it did not apply to his knowledge.</p> <p>Dr. Scalettar recommended to continue with the safe harbor approach and they can revisit this at a later date.</p> <p>Dawn Bonder also mentioned that MA is planning to move to an external vendor solution, as opposed to internal. Additionally, external requests in MA go through a second committee review and an internal review. The requests are open for public comment for 30 days. Lastly, they have chosen to not provide public use files.</p>		
4.	Privacy Policy Review	CedarBridge Group	9:30 AM
	<p><u>Section 8. Return or Destruction of Data</u></p> <p>There were no comments or objections to the recommended changes.</p>		

SECTION	RECOMMENDATION(S)	OUTCOME
8.a	KEEP AS-IS	Preliminary accepted
8.b	KEEP AS-IS AND DELETE ONE SENTENCE	Preliminary accepted
8.c	KEEP AS-IS	Preliminary accepted

Section 9. Ownership of Data and Work Product

There were no comments or objections to the recommended changes.

SECTION	RECOMMENDATION(S)	OUTCOME
9.a	KEEP AS-IS	Preliminary accepted
9.b	KEEP AS-IS	Preliminary accepted
9.c	KEEP AS-IS	Preliminary accepted
9.c.i - iv	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted

Section 10. Annual Reporting

The committee had discussion on what type of review or evaluation the Data Release Committee should have. James Iacobellis suggested follow up with someone at OHS who has expertise in administrative law appeals process.

SECTION	RECOMMENDATION(S)	OUTCOME
10.a	FURTHER DISCUSS; KEEP AS-IS	Modify Language
10.b	KEEP AS-IS	Preliminary accepted

Section 11. Conflicts

There were no comments or objections to this section.

SECTION	RECOMMENDATION(S)	OUTCOME
11.a	KEEP AS-IS	Preliminary accepted
11.b	KEEP AS-IS	Preliminary accepted

Section 12. Confidentiality

There were no comments or objections to this section.

SECTION	RECOMMENDATION(S)	OUTCOME
12	KEEP AS-IS	Preliminary accepted

5. Revised Policy Review CedarBridge Group 9:55 AM

Dawn Bonder indicated that wording highlighted in yellow is new language based on the committees' original feedback.

James Iacobellis asked about the issue related to joining a data consortium. The consensus from the committee was to have a larger group provide input on the issue.

Dawn Bonder indicated she would update language related to External Procedures in Section 3.

	<p>Pat Checko made a comment related to the Governance section. She would like a member of the CT Department of Mental Health and Addiction Services to participate in the DRC. Dawn Bonder indicated that they will make a note to add an additional committee member.</p> <p>Dr. Scalettar asked Dr. Susan Israel to provide input on Section 5. Dr. Susan Israel asked if they should add language about not using personal or unapproved devices. The committee members agreed to check back with Allan Hackney from OHS.</p> <p>Dawn Bonder indicated that she will revisit language on Dr. Susan Israel’s additional point about re-identifying data or matching de-identified data to other data sets.</p> <p>Pat Checko clarified that the DRC only sees the application of the data requestor. They do not actually view the data being released.</p> <p>Michael Matthews suggested that Allan Hackney address these questions at the next meeting. Dr. Scalettar agreed.</p>		
6.	Next Steps and Adjournment	Dr. Scalettar	
	<p>Dawn Bonder indicated that they will continue to review the revised policy for consistency and language at the next meeting. She indicated that if a member has strong through or any revised language or sections, to please send in advance of the next meeting. Dr. Scalettar echoed the request and thanked everyone for their hard work in revising the policy.</p>		

Upcoming Meeting Schedule: June 28, 2019.

Appendix: Change Log Summary

SECTION	RECOMMENDATION(S)	6/14 MEETING OUTCOME
8.a	KEEP AS-IS	Preliminary accepted
8.b	KEEP AS-IS AND DELETE ONE SENTENCE	Preliminary accepted
8.c	KEEP AS-IS	Preliminary accepted
9.a	KEEP AS-IS	Preliminary accepted
9.b	KEEP AS-IS	Preliminary accepted
9.c	KEEP AS-IS	Preliminary accepted
9.c.i - iv	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
10.a	FURTHER DISCUSS; KEEP AS-IS	Modify Language
10.b	KEEP AS-IS	Preliminary accepted
11.a	KEEP AS-IS	Preliminary accepted
11.b	KEEP AS-IS	Preliminary accepted
12	KEEP AS-IS	Preliminary accepted