

# APCD Data Privacy and Security Subcommittee

## Meeting Minutes

| MEETING DATE                 | MEETING TIME     | Location                                   |
|------------------------------|------------------|--|
| June 28 <sup>th</sup> , 2019 | 9:00AM – 11:00AM | 195 Farmington Ave<br>Farmington, CT 06032 |

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

| Minutes |   |                          |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
|---------|---|--------------------------|----------------|---------|-------------------|---------|-----|--------------------|----------|-----|--------------------|----------|-------|--------------------|----------|--------|--------------------|----------|--------|--------------------|----------|---------|--------------------|----------|--------|--------------------|----------|--------|--------------------|----------|-------|-----------------|--------------------------|-------|--------------------|--------|---------|--------------------|----------|---------|--------------------|----------|---------|--------------------|----------|
|         | Topic   | Responsible Party        | Time           |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 1.      | <b>Welcome and Call to Order</b>  | <b>Dr. Scalettar</b>     | <b>9:00 AM</b> |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
|         | <p>Dr. Scalettar thanked everyone for joining the call. He thanked the CedarBridge team for their support of the Subcommittee’s work.</p> <p>Dr. Scalettar asked if there were any revisions to the previous meeting’s minutes. There were none. The meeting minutes were accepted.</p>   |                          |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 2.      | <b>Public Comment</b>   | <b>Attendees</b>         | <b>9:10 AM</b> |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
|         | No public comments at this time.  |                          |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 3.      | <b>June 14 Meeting Recap</b>  | <b>CedarBridge Group</b> | <b>9:15 AM</b> |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
|         | Michael Matthews provided a brief overview of the items that were discussed at the last meeting.  |                          |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 4.      | <b>Procedural Analysis Review</b>   | <b>CedarBridge Group</b> | <b>9:20 AM</b> |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
|         | <p>Michael Matthews indicated procedures had been recommended as “internal” or “external.” He asked for the Subcommittee’s feedback as they reviewed the procedures:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>SECTION</th> <th>RECOMMENDATION(S)</th> <th>OUTCOME</th> </tr> </thead> <tbody> <tr><td>3.b</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>3.c</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>4.c.i</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>4.c.ii</td><td>EXTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>4.c.iv</td><td>EXTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>5.a.iii</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>5.a.iv</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>5.c.ii</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>5.d.i</td><td>REMOVE LANGUAGE</td><td>Accepted/Modify language</td></tr> <tr><td>5.e.i</td><td>INTERNAL PROCEDURE</td><td>Modify</td></tr> <tr><td>6.e.i.1</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>6.e.i.2</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> <tr><td>6.e.i.3</td><td>INTERNAL PROCEDURE</td><td>Accepted</td></tr> </tbody> </table> |                          |                | SECTION | RECOMMENDATION(S) | OUTCOME | 3.b | INTERNAL PROCEDURE | Accepted | 3.c | INTERNAL PROCEDURE | Accepted | 4.c.i | INTERNAL PROCEDURE | Accepted | 4.c.ii | EXTERNAL PROCEDURE | Accepted | 4.c.iv | EXTERNAL PROCEDURE | Accepted | 5.a.iii | INTERNAL PROCEDURE | Accepted | 5.a.iv | INTERNAL PROCEDURE | Accepted | 5.c.ii | INTERNAL PROCEDURE | Accepted | 5.d.i | REMOVE LANGUAGE | Accepted/Modify language | 5.e.i | INTERNAL PROCEDURE | Modify | 6.e.i.1 | INTERNAL PROCEDURE | Accepted | 6.e.i.2 | INTERNAL PROCEDURE | Accepted | 6.e.i.3 | INTERNAL PROCEDURE | Accepted |
| SECTION | RECOMMENDATION(S)   | OUTCOME                  |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 3.b     | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 3.c     | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 4.c.i   | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 4.c.ii  | EXTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 4.c.iv  | EXTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 5.a.iii | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 5.a.iv  | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 5.c.ii  | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 5.d.i   | REMOVE LANGUAGE   | Accepted/Modify language |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 5.e.i   | INTERNAL PROCEDURE  | Modify                   |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 6.e.i.1 | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 6.e.i.2 | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |
| 6.e.i.3 | INTERNAL PROCEDURE  | Accepted                 |                |         |                   |         |     |                    |          |     |                    |          |       |                    |          |        |                    |          |        |                    |          |         |                    |          |        |                    |          |        |                    |          |       |                 |                          |       |                    |        |         |                    |          |         |                    |          |         |                    |          |

|         |                    |                                       |
|---------|--------------------|---------------------------------------|
| 6.e.i.4 | INTERNAL PROCEDURE | Accepted                              |
| 6.e.i.5 | INTERNAL PROCEDURE | Accepted                              |
| 7.b.i   | EXTERNAL PROCEDURE | Accepted                              |
| 7.b.ii  | EXTERNAL PROCEDURE | Accepted                              |
| 8.b     | INTERNAL PROCEDURE | Accepted, but keep language in policy |
| 9.c.i   | INTERNAL PROCEDURE | Accepted                              |
| 9.c.ii  | EXTERNAL PROCEDURE | Accepted                              |
| 9.c.iii | EXTERNAL PROCEDURE | Accepted                              |
| 9.c.iv  | EXTERNAL PROCEDURE | Accepted                              |

**5. Revised Privacy Policy Review** CedarBridge Group 9:45 AM

Dawn Bonder reviewed updated language to the revised privacy policy.

Section 2: Definitions

Dawn Bonder reviewed definitions for “external” and “internal” procedures.

| SECTION | REVISION(S)                            | OUTCOME  |
|---------|--|----------|
| 2.p     | ADDED “EXTERNAL PROCEDURES” DEFINITION | Accepted |
| 2.s     | ADDED “INTERNAL PROCEDURES” DEFINITION | Accepted |

Section 3.c.i: Health Information Technology Officer

Dawn Bonder indicated that she would wordsmith this section to ensure it matched the definitions above.

| SECTION | REVISION(S)    | OUTCOME |
|---------|----------------|---------|
| 3.c.i   | ADDED LANGUAGE | Modify  |

Section 4: Data Release Committee

Ted Doolittle asked if officials of CT Offices had been informed of this request. Allan Hackney indicated that appropriate individuals had been informed.

Dr. Scalettar asked about the possibility of data linkage. Allan Hackney indicated there would be linkage. He indicated that OHS has statutory authority to use data available in pursuit of its mission. Dr. Susan Israel indicated this was a concern for her.

Pat Checko asked about the concept of providing a limited data set. Allan Hackney indicated that they still need to have lawyers review the language in statute. Matthew Katz believed this should be a broader discussion with the APCD Advisory Group. Dr. Scalettar and Allan Hackney agreed.

| SECTION | REVISION(S)         | OUTCOME  |
|---------|---------------------|----------|
| 4.b.i   | ADDED LANGUAGE      | Accepted |
| 5.b.iii | UPDATED LANGUAGE    | Accepted |
| 5.b.iv  | ADDED LANGUAGE BACK | Accepted |

Section 6.d.iii: No Right of Appeal

Dawn Bonder asked the Subcommittee to provide feedback on this section. The consensus was to add “of data release application” to section for more specificity. Dawn Bonder indicated she would add this into the section.

| SECTION | RECOMMENDATION(S) | OUTCOME  |
|---------|-------------------|----------|
| 6.d.iii | ADD LANGUAGE      | Accepted |

Section 10: Annual Reporting

Dawn Bonder indicated that she updated these sections to reflect the APCD Advisory Group as the reviewing body and the intent of continuous quality improvement. The subcommittee members concurred with the remaining updates.

| SECTION | REVISION(S)                | OUTCOME  |
|---------|----------------------------|----------|
| 10. a   | UPDATED LANGUAGE           | Accepted |
| 10.b    | UPDATED AND ADDED LANGUAGE | Accepted |

|           |   |                          |                 |
|-----------|---|--------------------------|-----------------|
| <b>6.</b> | <b>Next Steps and Adjournment</b>   | <b>CedarBridge Group</b> | <b>10:25 AM</b> |
|           | Michael Matthews thanked the Subcommittee for their great work. He asked the members if they would like to reconvene or review updates via email. The consensus from the subcommittee was to review the revised policy by email and keep an option to reconvene if members felt it necessary. |                          |                 |