

APCD Data Privacy and Security Subcommittee

Meeting Minutes

MEETING DATE	MEETING TIME	Location
May 17 th , 2019	9:00AM – 10:30AM	195 Farmington Ave 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	x
Rob Blundo, AccessHealth CT		Michael Matthews, CedarBridge	x	Dawn Bonder, CedarBridge	x
		Chris Robinson, CedarBridge	x	Sheetal Shah, CedarBridge	x

Minutes			
	Topic	Responsible Party	Time
1.	Welcome and Call to Order	Dr. Scalettar	9:00 AM
	<p>Dr. Scalettar thanked everyone for joining today. He thanked the CedarBridge team, particularly Dawn Bonder for circulating website links and literature.</p> <p>Dr. Scalettar asked if there were any comments, questions, or deletions to the minutes. Dr. Scalettar asked for a revision on page three of the minutes. The group accepted the revision. Matthew Katz asked if the minutes can clearly reflect decisions being made to the current policy. For example, a change log with dates and description of what has changed would be helpful. The minutes and suggestion for a change log were approved.</p>		
2.	Public Comment	Attendees	9:15 AM
	No public comments at this time.		
3.	Review of Follow Up Items	CedarBridge Group	9:20 AM
	<p>Michael Matthews informed the subcommittee of an excellent presentation by Dr. Robert Aseltine at the last APCD Advisory Group meeting on how APCD data could be used for quality measurement. This was a question which arose at a previous subcommittee meeting. No further questions on this topic were presented.</p> <p>Dawn Bonder informed the subcommittee that information on other states' websites and literature was circulated with meeting materials. In response to a question at the last meeting, articles discussing the effects of sharing data with consumers on price and quality. The consensus is that it is too early to tell what impact it has on consumer decision making. Furthermore, part of the difficulty is educating consumers on the existence of this information and how to use it.</p> <p>Mark Hetz indicated that CedarBridge Group is continuing to follow up with interviews from neighboring states. He interviewed Tanya Bernstein from Rhode Island (RI). A call with Vermont is scheduled and the scheduling of interviews with New York and Massachusetts is in process. The interview with RI was very interesting and informative. One of the key take-aways is that RI employs a "lock-box" approach. The APCD provides a common identifier to produce a longitudinal record but does not contain PHI. They strongly discourage anyone from pursuing this method because it is administratively cumbersome. Additionally, they are the only state that has an opt-out policy; only 2% choose to opt-out. Finally, RI has consumer data on their website, but they believe it has very low utilization. RI is able to use Medicaid matching funds for</p>		

ongoing maintenance for the entire system. They also get approximately \$400,000 from data usage fees. This money, along with the matching funds from CMS, comes very close to covering their operational costs.

Dr. Scalettar requested CedarBridge Group to tie information from the second set of interviews back to the state level grid. Mark Hetz indicated that initially the environmental scan for RI is still accurate; the interview provided more depth and color. Most importantly, it reaffirmed the directional recommendation that was provided.

Pat Checko mentioned she missed learnings from SIM on use of APCD. However, she had questions related to opt-out and asked for further explanation of the issues.

Mark Hetz indicated the issues were more administrative. There were issues in identifying all the individuals in the claims data who opted-out. This is also tied back to the “lock-box” approach. This, in combination with having certain individuals opt-out, is administratively burdensome to manage. It can cause issues with the integrity of the data.

Pat Checko indicated they had a bit of confusion during a recent DRC meeting. They have limited information about the APCD operations but are aware of a member identifier. This is a linking number that the APCD uses; it is not a direct identifier. She believed the issue from a technical perspective may not be impossible to overcome. She also did not realize that the APCD Advisory Group meeting would have guests speak to the use of data to date. Another issue she identified is a separation between the APCD, the Advisory Group, and the DRC. She requested the subcommittee think about this issue during the review process.

Bernie Inskeep asked if anyone was interested in learning about the actual limitations of RI’s process. Krista Cattanach indicated she was.

Bernie Inskeep explained there is a statutory prohibition for RI to collect PII and store it. Additionally, they cannot have a direct vendor do this for them. RI had to add another vendor Arcadia. United submits monthly eligibility files to Arcadia. Arcadia determines which individuals opt-out. Then, Arcadia gives United an identifier which United concatenates to their file and then submits the file to the vendor Onpoint. Sometimes, Arcadia assigns the wrong number. The other limitation is related to the sheer volume of data. They do not receive files in a timely manner, and this creates another set of issues. She agreed with the recommendation to not implement this approach.

Krista Cattanach asked if Arcadia technology is similar to Universal Patient Key.

Bernie Inskeep was not familiar with the technical components of Arcadia. She reiterated that it was an administratively burdensome process.

4. Privacy Policy Review	CedarBridge Group	9:30 AM
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Michael Matthews informed the subcommittee that he wants members to have thoughts carefully considered as they review the policy but would also like to increase the pace, as there are many items to cover. He informed the members that none of what was distributed is “carved in stone”; this is meant to be a starting point for consideration. The second point is that the CedarBridge team found many procedures in the existing policy. In many organizations, policies and procedures are in different documents for various reasons. Policies often have a higher level of scrutiny. Procedures were woven into this policy, so the members will see that CedarBridge is recommending stripping out procedures from the policy for ease of operations and governance. The next area to note is a direct result of the legislation which brought the APCD over to OHS. There will be a shift as the APCD transitions to a state entity and the language in the

policy will reflect that shift. Lastly, to Pat Checko’s point, the connection between the APCD Advisory Group and other governance committees should be addressed in the policy. During the discussion, members can identify core areas of concern, propose an approach, and the CedarBridge team can “wordsmith” the document after the call.

Dawn Bonder summarized the approach to reviewing the privacy policy document.

Section 1. Purpose of Policy

Dawn Bonder indicated that they will add citations for the appropriate legislation authorizing the APCD to move to OHS. The recommendation is to also think about adding language regarding the balance of protection of privacy and maximizing value of data.

Matthew Katz conceptually agreed with moving procedures out of this document, but believes the a concrete process for how procedural components will be operationalized and updated needs to be articulated.

Dawn Bonder agreed. Subcommittee members need to understand how the procedural document is tied to the policy document; authority over changes, and the process for changes. This is less cumbersome than changing the policy document.

Michael Matthews suggested this item be flagged for later discussion. The members can come back with specific language for the group’s consideration. Review or guidance from the APCD Advisory Group and relevant committees may be necessary.

Matthew Katz agreed with this approach. He wanted to ensure the subcommittee has the opportunity to have this discussion.

Pat Checko asked if the existing Advisory Group will be the advising board.

Allan Hackney indicated that there would be no change on the APCD Advisory Group. This was codified to be a standing committee of the HIT Advisory Council.

SECTION	RECOMMENDATION(S)	OUTCOME
1.a	KEEP AS-IS	Preliminary accepted
1.b	KEEP AS-IS AND DELETE LAST SENTENCE	Preliminary accepted

Section 2. Definitions

Dawn Bonder indicated that every reference to the Exchange will change to OHS. She also noted where definitions need to be added, like HITO and OHS. The citation for the appropriate legislation will be added.

Michael Matthews paused the conversation to ensure “sign off” is noted as each section is reviewed. He asked the group if they had any actual changes to the recent definitions.

Matthew Katz asked if they should define relevant subcommittees, like APCD Data Privacy and Security Subcommittee. Dawn Bonder indicated that they can add this.

Krista Cattanaich had a question about the definition of “data.” She asked if there was another definition for identifiable data. Dawn Bonder referred her to the definition of “limited data set.” There is another data definition which deals with identified data.

Krista Cattanach indicated that she would take another look at how “data” is used in the policy.

Michael Matthews asked to clarify to the extent that the APCD may deal with identifiable data, this may not be addressed in definition. Krista Cattanach agreed. Dawn Bonder will make note of this and address “data” definition.

SECTION	RECOMMENDATION(S)	OUTCOME
2.a	KEEP AS-IS	Preliminary accepted
2.b	KEEP AS-IS	Preliminary accepted
2.c	KEEP AS-IS	Preliminary accepted
2.d	KEEP AS-IS	Preliminary accepted
2.e	KEEP AS-IS	Preliminary accepted
2.f	KEEP AS-IS	Preliminary accepted
2.g	DELETE	Preliminary accepted
2.h	DELETE	Preliminary accepted
2.i	KEEP AS-IS	Preliminary accepted
2.j	KEEP AS-IS	Preliminary accepted
2.k	KEEP AS-IS	Preliminary accepted
2.l	KEEP AS-IS	Preliminary accepted
2.m	KEEP AS-IS	Preliminary accepted
2.n	KEEP AS-IS	Preliminary accepted
2.o	DELETE	Preliminary accepted
2.p	KEEP AS-IS	Preliminary accepted
2.q	KEEP AS-IS	Preliminary accepted
2.r	KEEP AS-IS	Preliminary accepted
2.s	KEEP AS-IS	Preliminary accepted
2.t	KEEP AS-IS	Preliminary accepted
2.u	KEEP AS-IS	Preliminary accepted
2.v	KEEP AS-IS	Preliminary accepted
2.w	KEEP AS-IS	Preliminary accepted
2.x	KEEP AS-IS	Preliminary accepted
2.y	KEEP AS-IS	Preliminary accepted

Section 3. Executive Director

Dawn Bonder indicated that all references to Executive Director will be changed to HITO. Additionally, the more detailed-oriented language in this section could be put into a procedural document.

Matthew Katz asked if HITO or Office of Health Strategy needs to be in document. Dawn Bonder indicated that HITO will be the titled authority for general oversight and responsibility. The HITO will report to the Director of OHS. Allan Hackney confirmed this was accurate.

Dawn Bonder indicated that this can be clarified in the definition.

Ted Doolittle asked if a phrase like “or such successor designated in statute” could be added in order to “future-proof” the document. Allan Hackney indicated that the Executive Director of OHS will designate a successor for the APCD, effectively solving Ted Doolittle’s issue or concern.

Dr. Scalettar asked for the official title. Allan Hackney indicated it was the Health Information Technology Officer.

Dawn Bonder mentioned that the policy does allow for delegation of function to other employees. HITO will be able to enlist other employees in the department to help manage these responsibilities under HITO supervision.

SECTION	RECOMMENDATION(S)	OUTCOME
3.a	MODIFIED	Preliminary accepted
3.b	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
3.c	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted

Section 4. Data Release Committee

Dawn Bonder indicated that they could tie in the procedural document under Purpose and Mission section.

Under the Governance section, Dawn Bonder explained that there are currently 8 members on the committee; one member of the Board is ex-officio. Since there will no longer be a Board, one option is to have a 7-person committee. Her recommendation is that ex-officio position is not needed moving forward. Matthew Katz believed there is no need for this ex-officio member. Bernie Inskip agreed. Group agreed to delete this.

Dawn Bonder asked if there are any other stakeholder groups which should be represented.

Dr. Scalettar asked, based on the environmental scan, if there were any groups missing. Dawn Bonder indicated that this was pretty standard and did not see any missing stakeholder groups. From a CT standpoint, she is interested to learn if there are any groups that are unique.

SECTION	RECOMMENDATION(S)	OUTCOME
4.a	KEEP AS-IS	Preliminary accepted
4.b.i	MODIFIED	Preliminary accepted

Section 4.b.ii Appointment and Removal

Dawn Bonder indicated that there is no longer a CEO, so the group should think about how the DRC members get appointed. They could be appointed by HITO or through an agency lead. There will be pros and cons to any approach.

Matthew Katz asked if the APCD itself can make recommendations to HITO or the agency as part of the process. Therefore, there would be proactive vetting of individuals to be on the committee.

Michael Matthews believed this was a good suggestion.

Pat Checko asked how the process worked with creating the current committee. Matthew Katz indicated the Former Executive Director asked for suggestions, but it was not a formalized engagement. Pat Checko suggested a role for the DRC Chair in suggesting members as well.

Matthew Katz agreed; they want to ensure the committees work well together.

Michael Matthews suggested language along the lines of “with HITO, in consultation with Chair of DRC and Chair of APCD Advisory Group.”

Matthew Katz would like to ensure there is vetting conducted more broadly than solely with the Chair of the APCD.

Allan Hackney suggested a process utilized by the Health Care Cabinet. There are some subcommittees similar to the APCD. Recommendations are brought to the Cabinet level, there are discussions on individual's credentials and then the entire Cabinet is asked to vote. It is a democratic process and may be a good process for the APCD. Matthew Katz liked this and agreed with Pat Checko's suggestion to have the Chair of DRC involved.

Pat Checko suggested the Chair of the DRC should be appointed an ex-officio member of the APCD Advisory Group so there is a good working relationship in the future. Allan Hackney supports this. Matthew Katz would like to make that a formal recommendation.

Dawn Bonder indicated this is a recommendation that will come out of this work, as well as a broader recommendation made to the APCD Advisory Group.

SECTION	RECOMMENDATION(S)	OUTCOME
4.b.ii	KEEP AS-IS AND DELETE	Preliminary accepted
4.b.iii	KEEP AS-IS	Preliminary accepted
4.b.iv	KEEP AS-IS	Preliminary accepted
4.b.v	MODIFIED	Preliminary accepted

Section 4.c. Meetings

Dawn Bonder proposed moving the detail of this section into a procedure document. Subcommittee members agreed.

SECTION	RECOMMENDATION(S)	OUTCOME
4.c.i	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
4.c.ii	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
4.c.iii	KEEP AS-IS	Preliminary accepted
4.c.iv	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
4.d.i	KEEP AS-IS	Preliminary accepted
4.d.ii	KEEP AS-IS	Preliminary accepted
4.e	KEEP AS-IS	Preliminary accepted
5.a.i	KEEP AS-IS	Preliminary accepted
5.a.ii	KEEP AS-IS	Preliminary accepted
5.a.iii	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.a.iv	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted

Section 5.b. Use of Managed Environment and Data

Dawn indicated that other States had language related to an enforcement mechanism or penalty in this section. She asked the group if they think this was important or advantageous in any way.

Matthew Katz believed it was important, however he is not sure if the Subcommittee can make this decision. Dawn Bonder would be able to draft some language in a situation that would require enforcement or penalty.

Michael Matthews asked, in this context, about policy versus procedure. The policy could make reference to the HITO or the Executive Director of OHS to maintain personnel policies for handling matters such as misuse of data. Therefore, there is a separate document on what HR consequences could be.

Pat Checko asked if there is a state policy or procedure that speak to the issue of breach/security.

Allan Hackney indicated that policies exist agency by agency. OHS has adopted a set of policies based largely on Department of Public Health. If it is a state employee causing a breach, there are issues related to working with unions on a reprimand or procedural process.

Dawn Bonder asked if it would be feasible to cite that agency policy. Allan Hackney recommended this.

Ted Doolittle asked if they could add language “or such successor policy” so they would not have to come back and change it. Dawn Bonder believed there is language further in the document to update policy if there is a statutory change and this may cover Ted Doolittle’s concern. However, this can be reviewed to assess if it would be better to include it each time.

Dr. Scalettar asked if “APCD” personnel changes to “OHS” personnel. Dawn Bonder confirmed this is accurate.

Matthew Katz made a suggestion to include a report back to the APCD Data Privacy and Security Subcommittee when there is a breach of information.

SECTION	RECOMMENDATION(S)	OUTCOME
5.b.i	KEEP AS-IS	Preliminary accepted
5.b.ii	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.b.iii	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.b.iv	KEEP AS-IS	Preliminary accepted
5.b.v	KEEP AS-IS	Preliminary accepted
5.c.i	KEEP AS-IS	Preliminary accepted
5.c.ii	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted

Section 5.d. Safeguarding Data in the Exchange’s Possession

Dawn Bonder indicated that some portions of this section will be removed and some portions would be moved to a procedural document. The trend is to provide less detail on where information is stored in order to prevent giving hackers a to data. It is okay to be a little more obtuse in a public facing policy.

SECTION	RECOMMENDATION(S)	OUTCOME
5.d.i	DELETE PORTION AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.d.ii	KEEP AS-IS	Preliminary accepted
5.e.i	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.e.ii	KEEP AS-IS	Preliminary accepted
6.a	KEEP AS-IS	Preliminary accepted
6.b	KEEP AS-IS	Preliminary accepted
6.c	KEEP AS-IS	Preliminary accepted

Section 6.d. Confidentiality

Dawn Bonder noted this section was inconsistent with section 7(f).

Pat Checko indicated this is section is in conflict with practice. Currently, the applicant and information about the decision on the request is posted. In this section, she would like to see the HITO, in consultation

with DRC, create the application and the process. Additionally, there should be no confidentiality regarding the data request.

Matthew Katz vividly recalls the discussion on this piece. They did not want to impugn or negatively impact those who were rejected. Now, he saw no reason to have this section. Dr. Scalettar agreed.

SECTION	RECOMMENDATION(S)	OUTCOME
6.d	DELETE	Preliminary accepted

Section 6.e.i Role of Executive Director

Dawn Bonder suggested moving detail-oriented language into a procedural document.

Matthew Katz asked if Allan Hackney believed anything is missing or unnecessary in this section. Allan Hackney believed this is directionally correct. He will review this section again.

Pat Checko specified Rob Blundo currently does all the front-end work with the applicant. She is concerned that this is a time-consuming role, especially if they expect more requests. She suggested that HITO can delegate someone to do this.

Dawn Bonder indicated that pursuant to a prior section, HITO has authority to delegate duties like this to other employees. Allan Hackney and other individuals can assist in taking on responsibility for initial review. Allan Hackney agreed.

Matthew Katz understood that there will be an increase in number of requests which should also mean additional revenue to sustain APCD. Pat Checko agreed with that completely. She wants to ensure they talk about balancing privacy with the value of the data.

SECTION	RECOMMENDATION(S)	OUTCOME
6.e.i.1	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
6.e.i.2	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
6.e.i.3	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
6.e.i.4	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted

5.	Next Steps and Adjournment	Dr. Scalettar	10:25 AM
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Michael Matthews believed this has been a wonderful conversation and they have gone at the right pace. They may have to extend this process to another meeting or two if needed. They will have an informed group to support the APCD operations on a go-forward basis. The group has laid a great foundation for future success of the APCD. The CedarBridge team has information to work from and can start drafting an updated policy for review.

Pat Checko mentioned that she asked Allan Hackney to speak at the next DRC meeting. She also suggested that the DRC’s input will be valuable to this committee. She hoped that members did not mind that she shared this meeting information with the DRC committee.

Michael Matthews thanked Pat Checko for the engagement.

Dawn Bonder asked if there is anything to make the review process easier.

Matthew Katz liked the color coding and thought it was incredibly helpful. He wanted to ensure that whatever is publicly presented is clear and they can operationalize quickly.

Upcoming Meeting Schedule: May 31; June 14, 2019.

Appendix: Change Log Summary

SECTION	RECOMMENDATION(S)	5/17 MEETING OUTCOME
1.a	KEEP AS-IS	Preliminary accepted
1.b	KEEP AS-IS AND DELETE LAST SENTENCE	Preliminary accepted
2.a	KEEP AS-IS	Preliminary accepted
2.b	KEEP AS-IS	Preliminary accepted
2.c	KEEP AS-IS	Preliminary accepted
2.d	KEEP AS-IS	Preliminary accepted
2.e	KEEP AS-IS	Preliminary accepted
2.f	KEEP AS-IS	Preliminary accepted
2.g	DELETE	Preliminary accepted
2.h	DELETE	Preliminary accepted
2.i	KEEP AS-IS	Preliminary accepted
2.j	KEEP AS-IS	Preliminary accepted
2.k	KEEP AS-IS	Preliminary accepted
2.l	KEEP AS-IS	Preliminary accepted
2.m	KEEP AS-IS	Preliminary accepted
2.n	KEEP AS-IS	Preliminary accepted
2.o	DELETE	Preliminary accepted
2.p	KEEP AS-IS	Preliminary accepted
2.q	KEEP AS-IS	Preliminary accepted
2.r	KEEP AS-IS	Preliminary accepted
2.s	KEEP AS-IS	Preliminary accepted
2.t	KEEP AS-IS	Preliminary accepted
2.u	KEEP AS-IS	Preliminary accepted
2.v	KEEP AS-IS	Preliminary accepted

2.w	KEEP AS-IS	Preliminary accepted
2.x	KEEP AS-IS	Preliminary accepted
2.y	KEEP AS-IS	Preliminary accepted
3.a	MODIFIED	Preliminary accepted
3.b	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
3.c	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
4.a	KEEP AS-IS	Preliminary accepted
4.b.i	MODIFIED	Preliminary accepted
4.b.ii	KEEP AS-IS AND DELETE	Preliminary accepted
4.b.iii	KEEP AS-IS	Preliminary accepted
4.b.iv	KEEP AS-IS	Preliminary accepted
4.b.v	MODIFIED	Preliminary accepted
4.c.i	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
4.c.ii	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
4.c.iii	KEEP AS-IS	Preliminary accepted
4.c.iv	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
4.d.i	KEEP AS-IS	Preliminary accepted
4.d.ii	KEEP AS-IS	Preliminary accepted
4.e	KEEP AS-IS	Preliminary accepted
5.a.i	KEEP AS-IS	Preliminary accepted
5.a.ii	KEEP AS-IS	Preliminary accepted
5.a.iii	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.a.iv	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.b.i	KEEP AS-IS	Preliminary accepted
5.b.ii	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.b.iii	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.b.iv	KEEP AS-IS	Preliminary accepted
5.b.v	KEEP AS-IS	Preliminary accepted
5.c.i	KEEP AS-IS	Preliminary accepted

5.c.ii	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.d.i	DELETE PORTION AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.d.ii	KEEP AS-IS	Preliminary accepted
5.e.i	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
5.e.ii	KEEP AS-IS	Preliminary accepted
6.a	KEEP AS-IS	Preliminary accepted
6.b	KEEP AS-IS	Preliminary accepted
6.c	KEEP AS-IS	Preliminary accepted
6.d	DELETE	Preliminary accepted
6.e.i.1	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
6.e.i.2	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
6.e.i.3	MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted
6.e.i.4	KEEP AS-IS AND MOVE TO PROCEDURAL DOCUMENT	Preliminary accepted