


Introduction to Vermont's All-Payer Claims Database (APCD)

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Types of Health Care Data

	Purpose	Examples
Electronic Health Records	Organize patient health care information in one place for providers and health care organizations.	<ul style="list-style-type: none"> • Medical records • Patient portals
Administrative	Mechanism for producing bills, transmitting payments, and supporting other health care operations.	<ul style="list-style-type: none"> • Insurance claims • Hospital billing 
Public Health	Monitor populations, conditions, and other health-related activity.	<ul style="list-style-type: none"> • Immunization registry • Lead screening • Influenza
Surveys	Gather detailed information on specific topics.	<ul style="list-style-type: none"> • Behavioral Risk Factor Surveillance System • Consumer Assessment of Healthcare Providers and Systems

APCDs

- APCDs are very large databases containing health care claims.
- Vermont established its APCD, VHCURES (Vermont Health Care Uniform Reporting and Evaluation System), in 2009.¹ It was one of the first states to do so.
- Today, 31 states have or are implementing APCDs with 8 other states indicating a strong interest.

¹ 18 V.S.A. § 9410

VHCURES Overview



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 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.

VHCURES Statutory Purposes

- 1 determining the capacity and distribution of existing state resources
- 2 identifying health care needs and informing health care policy
- 3 evaluating the effectiveness of intervention programs for improving patient outcomes
- 4 comparing costs between various treatment settings and approaches
- 5 providing information to consumers and purchasers of health care
- 6 improving the quality and affordability of patient health care and health care coverage

VHCURES Data Protection



- Vermont statute also requires the GMCB protect the privacy of APCD data, incorporating those outlined in HIPAA. It goes even further and prohibits the public disclosure of any data that contains direct personal identifiers.
- In order to access data, users must successfully apply to ensure the use is allowable under HIPAA and the applicant can fulfill the data protection requirements.

18 V.S.A. § 9410

GMCB Rules

- 8.000: Data collection
- 9.000: Data release

GMCB Data Governance Charter

GMCB Data Governance Council

- Data Stewardship Principles & Policies
- Data Linkage Policy

Data Use and Disclosure Policies & Procedures Guide

Data Governance Council



GMCB's [Data Governance Council](#) is composed of seven voting members. The Council 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.

Current Council Membership:

- Susan Barrett, GMCB, Chair
- Tom Pelham, GMCB
- Sarah Kinsler, GMCB
- Cathy Fulton, VPQHC
- Lauri Scharf, Bi-State Primary Care
- Jessie Hammond, VDH
- Kristin McClure, ADS

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>
Security standards and certifications	<p>HITRUST</p> <p>HIPAA and CMS Qualified Entity Certification Program security standard-compliant</p> <p>Service Organization Center 3 (SOC-3) certified for data center</p> <p>National Institute of Standard and Technology (NIST) security guidance-compliant</p> <p>Security advisor is 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
	Secure File Transfer Protocol (SFTP) with PGP encryption
Data release	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

Current VHCURES Users



Vermont Department of Health	Utilization patterns and trends of chronic diseases
Department of Vermont Health Access	Blueprint for Health, Payment Reform
Department of Aging and Independent Living	Outcome and performance measures for programs and services
Joint Fiscal Office	Legislative Task Force on Affordable, Accessible Health Care
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
Archway Health Advisors	Development of episodic payments

S.285 Proposal

- Repeal subsection (e) of Sec. 4. 18 V.S.A. § 9410, which would allow the *collection* of live identifiers (e.g. name).
- Current protections would not change.
- Data users would still only have access to *deidentified* data.

S.285 Rationale

Change statute?

yes

no

**Impact:
High**
Allows potential for enhanced integration of data across Vermont (e.g., vital records, clinical information)

**Risk:
Low**
Introduces additional sensitive information in unlikely event data are compromised.

**Impact:
Neutral**
No change to current state, including information at risk in case data are compromised.

**Risk:
High**
Requires redundant systems and/or submissions to integrate claims within state's data systems

Examples of Current Use

- GMCB Reporting (<https://gmcboard.vermont.gov/data-and-analytics/analytics-rpts>)
- Blueprint for Health Community Health Profiles (<https://blueprintforhealth.vermont.gov/community-health-profiles>)
- Article: Change in Site of Children's Primary Care (<https://www.annfammed.org/content/17/5/390.full>)
- Mental Health Related ED Claims for VT Children (https://gmcboard.vermont.gov/sites/gmcb/files/documents/Pediatric%20MH%20ED%20Claims_Kasehagen%20%20Omland_9-19-2019.pdf)