Georgia All-Payer Claims Database (GAPCD) Advisory Committee

Approved Minutes

Quarterly Meeting

Thursday, February 23, 2023 | 10:30 am – 12:00 pm

Virtual Meeting | apcd@opb.georgia.gov

Attendees

Committee Members

a	Dr. Thomas Bat	p	Mr. Kelly Farr	p	Representative Darlene Taylor
a	Senator Ben Watson	p	Mr. Matthew Hicks	p	Mr. Grant Thomas (Chair)
p	Mr. Gregg Conley	p	Ms. Crysty Odom	p	Commissioner Kathleen Toomey
p	Dr. Jon Duke	p	Mr. Chad Purcell		

(p)resent; (a)bsent

Supporting Leadership/ Facilitation Present

> *Office of Health Strategy and Coordination (OHSC):* Elizabeth Holcomb, Anelia Moore, Colin Stauffer
>
> *Georgia Technology Authority (GTA):* Jake Star
>
> *Georgia Tech Research Institute Center for Health Analytics & Informatics (GTRI-CHAI):* Megan Denham

Discussion Notes

Opening Remarks, Introductions, Approval of Meeting Minutes

Mr. Grant Thomas, Director of OHSC and Chairman of the All-Payer Claims Database Advisory Committee, welcomed Committee members and addressed some housekeeping items before moving to this quarter's agenda. Chairman Thomas conveyed his appreciation for committee participation and that there are many positive updates on progress towards implementation of the APCD.

Chairman Thomas informed participants that the meeting was open to the public and would be conducted in accordance with the State of Georgia Open Meetings Act. He also let attendees know that the meeting would be recorded, and minutes would be posted to the website following approval by the committee at the next meeting. Minutes can also be obtained by writing to APCD@opb.georgia.gov. Participants were reminded that no public comment would be heard during the meeting, though comments may be sent to the same email address provided for obtaining meeting minutes.

Committee members were invited to speak up with questions throughout the meeting rather than wait until the end of the meeting.

As Chairman Thomas moved to the agenda, he informed participants that minutes from the previous meeting were emailed with the agenda in advance of the meeting, then asked if there were any

questions or comments regarding the minutes. There were no comments. Hearing no objection, the minutes from November were approved, and the committee roster was reviewed.

Closing the opening remarks, Chairman Thomas provided an update on changes to the Advisory Committee membership. Chairman Thomas notified the group that former Senator Dean Burke has taken a new role as Chief Medical Officer at the Georgia Department of Community Health (DCH) and Senator Ben Watson was appointed to serve as Chair of the Senate Appropriations Health & Human Development Subcommittee for the 2023-2024 legislative session. Additionally, Representative Butch Parrish was appointed to Chair of the House Special Committee on Healthcare, and Representative Darlene Taylor was appointed to serve as Chair of House Appropriations Health Subcommittee for the 2023-2024 legislative term. Chairman Thomas went on to articulate the valuable contributions that Senator Burke and Representative Parrish have made to advancing the APCD effort and their leadership on the advisory committee. Chairman Thomas then proceeded to thank Senator Burke and Representative Parrish for their strong support of OHSC and the All-Payer Claims Database. He then extended a warm welcome to Senator Watson and Representative Taylor as the new members of the Advisory Committee.

Project Update

Mr. Jake Star provided an update on the revised submitter onboarding strategy. Mr. Star provided some background on changes in the national landscape for APCDs. Specifically, as more states have come online, the standard for file submissions has grown in adoption. With these developments, a number of the implementation barriers that the APCD team anticipated have been alleviated. This has enabled the team to look at ways to accelerate the project. The initial plan called for a phased approach, with an early pilot of SHBP, Medicaid, and a small number of commercial payers. This pilot would be followed by groups of payers. Mr. Star explained that because many of the payers have been through this process already, a full pilot is no longer needed. Informed by adoption in other states and engagement with the submitters, the project team found that a consolidated approach was feasible. Additionally, the new approach would allow for a more compressed schedule as well. Now, with an established data collection supplier, the APCD team is able to have a clear rule with a shorter timeline.

Mr. Star then explained that a key learning for the project team has been that the best Medicare data will come about by splitting Medicare Advantage plans (which will be submitted by the individual plans) and Fee-for Service into separate submissions. So, the APCD will have more of this data sooner.

Mr. Star explained that as a result of these changes, the APCD team is currently expecting to finish the onboarding of all payers by December 2024. This is 6 months earlier than the previously planned June 2025 deadline.

Mr. Star then asked the group if there were any questions. There were no questions from committee members.

Key Milestones

Mr. Star went on to provide an update on key milestones for the APCD. He acknowledged that while the lead-up to the November 2022 meeting felt like a marathon, the last three months have been a sprint.

When the Advisory Committee met in November, the APCD team had just executed the contract with a data collection vendor. In that contract, there are very specific milestones Onpoint, the data collection vendor, had to meet in order for the data submission portal to be ready in April. All of the Onpoint milestones are on track.

Mr. Star then provided a high-level update that the rule requiring submissions, and the accompanying data submission guide, were published by Chairman Thomas on February 1st. This rule will become effective on March 3rd. In March, all payers are required to complete their registrations – that process has already started. The portal will be open for data submissions in April, and the health and pharmacy payers must complete submissions of most historical data by June 1st. This deadline will allow the APCD team to have enough data over the summer for CHAI to begin producing the analytic use cases that the APCD team shared in a previous meeting.

Mr. Star concluded this section by indicating the APCD team should be able to share some initial census data based on the payer registrations in the next Advisory Committee meeting. The APCD team will have a good sense at the next meeting of the number of payers, quantity of patients, and types of plans which will be reflected in our first analytics.

Mr. Star then asked the group if there were any questions about the project milestones. There were no questions from committee members.

APCD Budget Update

Mr. Star provided an update that the project remains on track from a financial perspective. As shared in November, the APCD team has not requested changes to the budget for Amended FY23. The Governor's proposed budget for FY24 recommends base funding of $800K for the APCD. The request would shift that funding from the Department of Community Health's budget to OHSC's budget.

Mr. Star then proceeded to update the Committee that the implementation budget for APCD is $9.8 million and that the total budget remains on track for that amount. Mr. Star then reminded the group that there are federal matching funds being applied to the project for implementation costs. Therefore, federal funds are able to provide significant supplemental funding to what the state has invested in the project.

Mr. Star then asked the group if there were any questions on the budget. There were no questions from committee members.

Mr. Star then handed the presentation over to Mr. Colin Stauffer from OHSC to provide an update on submitter rules.

Submitter Rules and Data Submission Guide

Mr. Stauffer announced that the APCD team has successfully progressed with the implementation of the APCD by publishing rules for submitters and an accompanying data submission guide. These will establish the format, standards, procedures, and deadlines by which health and dental plans must submit data to the APCD.

The APCD team began this process by engaging closely with the data submission standards subgroup throughout the summer and fall of last year. This engagement led to basing the submitter rules on best practices from other states. Likewise, the data submission guide was built on the national APCD-CDL standard to make participation as easy as possible. The submitter rules and data submission guide were then published for public comment on the OHSC website on December 21, 2022, with comments due on January 21, 2023. Feedback was incorporated from the public comments where appropriate, and the updated rules and official responses to comments were published on the OHSC website on February 1st. The rules become effective 30 days from the day they are published, which was on March 3, 2023.

<u>APCD Published Rules</u>

Mr. Stauffer then proceeded to review the submitter rules at a high level. Mr. Stauffer indicated that the full rules were shared as part of the pre-read email ahead of the meeting and can also be found on the OHSC website, but the APCD team wanted to take a moment and walk through some of the key points included in the rules:

- <u>Covered lives baseline</u> - The rule clarifies that the 1,000 covered lives threshold is as of December 31st of the previous year, given the tendency for health plan enrollments to fluctuate throughout the year.
- <u>Covered lives threshold</u> - The calculation of 1,000 total covered lives is based on the number of covered lives in aggregate from across all plans, not just any single plan. Once the payer exceeds the 1,000 lives threshold in aggregate, all non-ERISA claims across all plans must be submitted.
- <u>Population</u> - The target population is all Georgia residents and their dependents, regardless of where the service was delivered
- <u>Submission Frequency</u> - Ongoing submissions will be required on a monthly basis, with each file being submitted by the first business day of the second month after the report month. For example: April submissions would be due the first business day of June. This includes all claims adjudicated during the reporting period.
- <u>Submission Sequencing</u> – The APCD team opted to move away from phased onboarding within payer types, as mentioned above. However, the APCD team has made it clear to payers that an extension can be requested if they have challenges meeting the prescribed deadlines.
- <u>Penalties</u> - Penalties align with the statute, which calls for $1,000 per day of violation with submission rules.
- <u>Deadlines</u> - Finally, Mr. Stauffer provided the upcoming deadlines that will facilitate sequenced onboarding of submitters:
  - The deadline for registering with the Onpoint portal is March 7th
  - The deadline to submit the first health and pharmacy data file is no later than June 1st, with subsequent deadlines for additional historical and calendar year catchup data
  - The deadline to submit the first dental data file is no later than December 1st, again, with subsequent deadlines for additional historical and calendar year catchup data

Mr. Stauffer acknowledged that this is a high-level summary, but again, the detailed rules can be found online or in the pre-read email that came out in advance of the meeting.

Public Comments

Mr. Stauffer went on to reiterate that the proposed submitter rules were published to the OHSC website on December 21st of 2022 with comments due by January 21st of 2023. During this period, the APCD team received 18 official comments from 4 total submitters. Each comment was reviewed and collectively evaluated to determine if potential changes should be made to the submitter rules. The outcome of that process was that three changes were made to the rules:

- Additional clarification that stand-alone vision claims for non-medical services will not be required at this time
- Additional clarification that the 1,000 covered lives threshold includes 1,000 covered lives in aggregate across all plans
- The definition of "Georgia resident" was added to be defined as any eligible member whose residence is within the State of Georgia, and all covered dependents

Mr. Stauffer provided additional context that these changes were made as a result of the comments received. There were additional comments that did not result in a change to the rules, which were posted to the OHSC website, along with the official responses. To conclude this section, Mr. Stauffer once again reminded the group that the rules officially become effective on March 3, 2023.

Mr. Stauffer then asked the group if there were any questions regarding the data submission guide and adopted submitter rules. There were no questions from committee members.

Data Collection Status

Mr. Stauffer reminded the group that during the November Advisory Committee meeting, the APCD team announced the award of the APCD Data Collection contract to Onpoint Health Data ("Onpoint"). Since then, the APCD team has been diligently working to roll out the data collection platform and is pleased to announce that the plan is currently on schedule. From a technical implementation perspective, seven of Onpoint's 13 deliverables have been approved with a 100% on-time delivery rate. Mr. Stauffer commented that the work the APCD team has seen so far from Onpoint is intuitive and high quality, which is critical for submitter engagement.

Mr. Stauffer then went on to explain that from a submitter implementation and training perspective:

- The APCD team has opened the submitter registration portal for payers to come in, register, and be assigned a submitter ID that they will need to complete their production submissions.
- The data submission portal, where payers will upload their data files to, is configured and ready to be made available once final communications to the payers go out.
- 3 of the 4 planned submitter webinars have been facilitated, with one final webinar scheduled for the week of March 6th.

- One on ones are being facilitated between Onpoint and submitters to answer questions about mapping their data to the data submission guide and to troubleshoot any technical challenges with using the registration portal or encrypting submission files.

Mr. Stauffer clarified that the main takeaway is that from a technical and submitter engagement standpoint, the APCD team is ahead of schedule to begin collecting data submissions. The APCD team will be working with payers to complete their registrations and soon their submissions, but do not anticipate receiving data much farther in advance than the June 1st deadline discussed earlier.

Registered Submitters

Mr. Stauffer explained that for submitter onboarding, the first major milestone is getting submitters registered with the data collection solution. Registration involves the submitters providing some organization and contact information, and details on the expected number of members that will be included in the data submissions. After submission is complete, payers will be issued a submitter ID, which they will eventually be able to use to log in to the data submission portal. As the March 7th deadline for registration approaches, the APCD team wanted to share that five payers have successfully completed the process, while 14 are currently working with Onpoint to do some minor data cleanup and finalize their registrations. In the next meeting, the APCD team will be able to share numbers of registrants by type.

Mr. Stauffer then confirmed that the APCD team will continue to engage with payers and offer 1:1 support as the March 7th deadline for registration approaches. If a payer has a unique situation which may impact meeting the submission deadlines Mr. Stauffer mentioned earlier, they can reach out to the APCD team once they are registered.

Mr. Stauffer then asked the group if there were any questions regarding the data collection module. There were no questions from committee members.

Mr. Stauffer concluded the discussion around data collection efforts and transitioned the presentation to Dr. Jon Duke from CHAI to provide an update on analytics activities.

APCD Design Refresher

Dr. Duke provided a quick reminder for the group that the APCD architecture is broken into two logical components: the Data Collection Module and the Analytics and Reporting Module. The Data Collection Module implementation is being facilitated by Onpoint Health Data. The separate Analytics and Reporting Module, where the analyses required to deliver the analytic use cases that were reviewed in the 2022 November Advisory Committee meeting will be performed, will be stood up and facilitated by the state. The APCD team refers to the data file that will be passed from Onpoint to the state as the Limited Data Set or LDS.

Selected Analytics Strategy

Dr. Duke explained that the first step towards successfully delivering the analytic use cases is aligning on an overall analytic strategy. This strategy includes the composition of the analytic environment, security requirements, roles & responsibilities, and general approach to how analyses will be delivered. OHSC, CHAI, GDAC, and GTA worked together closely through November and December to collaboratively develop the APCD analytics strategy. The team is aligned on a path forward based on operational efficiency and optimizing the valuable analyses that can be delivered using the APCD data.

At a high level, the strategy lays out the following responsibilities:

- GDAC will own the development and sustainment of the analytics environment
- CHAI will own delivery of the analytic use cases

Dr. Duke reiterated the APCD team's confidence in this approach and its ability to deliver valuable analyses in alignment with the January 2024 deadline for the initial set of use cases and beyond.

Progress on Analytic Activities

Dr. Duke proceeded to explain that from a timeline perspective, the analytic environment is on track to be completed by April 2023. This means that the complete set of end-to-end tools and resources required to receive, transform, and analyze the data from a technical capability perspective will be completed. The APCD team has already successfully tested a file transfer from Onpoint to the analytic environment, so the team is well ahead of schedule.

Dr. Duke proceeded to explain that from a use case perspective, the APCD team has a dependency on receiving production data from Onpoint before it can start digging into the data. The APCD team anticipates receiving the first data extract from Onpoint in September of this year. However, this timeline does not mean that the APCD team is sitting idle. The team has already started building the transformations to convert the data from the data set, which will be received from Onpoint, into the target data model that will be used for analysis. The APCD team can start this work because it has already defined the different data structures. In addition, the team is refining the high-level use cases into target outputs, which means thinking through how best to represent the results of each analysis so that it is consumable by end users and can drive decision making. Examples of target outputs could be specific charts and dashboard metrics or a summary report. The APCD team will be working closely with the existing Use Case Workgroup and the upcoming data review committee to review and provide feedback on these target outputs.

Dr. Duke then thanked the Advisory Committee for allowing him to provide an update on the status of the analytics work associated with the project and asked if there were any questions. There were no questions from committee members.

Dr. Duke then turned the presentation over to Colin Stauffer to provide an update on stakeholder engagement.

Stakeholder Engagement Plan

Mr. Stauffer started by reminding the Advisory Committee that the APCD team laid out the stakeholder engagement plan and goals regarding gaining buy-in and driving participation during the 2022

November meeting. Since then, the APCD team has made great progress, including identifying relevant submitter & stakeholder groups across Georgia, engaging with submitters on a one-to-one basis prior to publishing the rules and data submission guide, facilitating onboarding trainings for submitters, presenting updates on the status of the APCD to different advocacy groups, and incorporating the feedback received into the implementation and ongoing stakeholder engagement plans.

Mr. Stauffer explained that the feedback received thus far has been very positive. The groups the APCD team have presented to are excited about the benefits that the APCD data can bring to bear for Georgia. They appreciate the team's approach to data privacy and security. Further, they are encouraged by the team's alignment with national standards and how that will make it easier for payers to participate. Additionally, they continue to be supportive of Georgia using APCD data to determine median pricing in support of the no surprise billing act. Now, as the APCD team transitions into planning for the more granular data analyses, it has had groups reach out from different sections of the healthcare ecosystem to offer their support and context around the nuances of healthcare delivery in Georgia. The APCD team looks forward to continued engagement with these stakeholders to make the APCD program as successful as possible.

Mr. Stauffer then articulated some of the important stakeholder engagement activities that the APCD team will be addressing:

- Reaching back out to individual payers to gauge their level of readiness and comfort with hitting the published deadlines. As part of these conversations, the APCD team will push to get insight into how many ERISA plans will be voluntarily participating. This will inform the need for additional engagement activities around ERISA plan participation.
- The APCD team recently kicked off requirement sessions for a dedicated APCD website. Currently, the APCD team is leveraging a subsection of the OHSC website to communicate APCD updates. Having a dedicated APCD site will make it easier for the community to engage with the APCD program in a meaningful way.
- Scheduling OHSC and CHAI facilitated virtual town halls so that all groups are getting the latest information at the same time.
- Continuing to leverage presentations at conferences and events, along with direct email outreach to submitters and advocacy groups where appropriate.

Mr. Stauffer concluded by conveying that the APCD team is very happy with the outcomes of efforts to date but knows that engagement is an ongoing activity that the APCD team is committed to supporting.

Mr. Stauffer then asked the group if there were any questions regarding stakeholder engagement activities. There were no questions from committee members.

Mr. Stauffer then turned the presentation over to Chairman Thomas to close out the meeting with upcoming activities and next steps.

<u>Upcoming Activities and Next Steps</u>

Chairman Thomas began by reinforcing that the APCD team has made excellent progress since the last Advisory Committee meeting, and the next few months will be equally busy. For Data Collection, the APCD team expects to finalize submitter registrations and begin testing sample submissions. For

analytics, the APCD team will stand up the analytics environment, continue to refine use cases, and move forward with data transformations. For stakeholder engagement, the APCD team will continue payer and advocacy group engagement. Finally, the APCD team will begin developing the processes needed for the request, review, and use of APCD data by state and external stakeholders.

Chairman Thomas went on to explain that from a workgroup and subgroup perspective, the APCD team will be convening the Data Use Agreement Subgroup in the April timeframe to review the latest draft of the data use agreement. Otherwise, the APCD team does not anticipate convening any workgroups or subgroups prior to the next quarterly Advisory Committee meeting.

Chairman Thomas then reiterated that the APCD program has an aggressive timeline and the APCD team needs to keep up the pace. Chairman Thomas expressed the APCD team's gratitude to the state agencies – DCH, GDAC, and GTA who have supported the process. He also stated that it has been very important that the APCD team maintains a high level or stakeholder engagement to ensure a successful implementation. Chairman Thomas then thanked the many members of the workgroups and subgroups, including state agencies, payers, health systems, providers, researchers, and all members of the APCD Advisory Committee for their very active engagement in the workgroups.

Chairman Thomas went on to thank the Governor, House, and Senate for their support of the APCD team's efforts to implement the APCD as demonstrated with the funding in the state budget that has been appropriated for the project to date.

Chairman Thomas then opened the floor for any questions from the Committee. There were no questions from committee members.

<u>Adjournment</u>

Hearing no questions, Chairman Thomas thanked everyone for their participation and for the great work and contributions from Committee members. He announced that the next meeting will be held in May 2023.