# Georgia All-Payer Claims Database 2023 Administrator Annual Report

March 1, 2024

Reporting Period: January 2023 – December 2023

The Georgia Tech Research Institute (GTRI) is providing this report to the General Assembly, pursuant to O.C.G.A. § 31-53-49, detailing the status of implementing the Georgia All-Payer Claims Database for the 2023 Calendar Year.

# Contents

# 1  Executive Summary

The Georgia All-Payer Claims Database (GA APCD) was created pursuant to O.C.G.A. § 31-53-40 et seq., through Senate Bill 482 in 2020, and is housed within the Office of Health Strategy and Coordination ("OHSC"), a division of the Governor's Office of Planning and Budget. The goal of the GA APCD is to inform data-driven, evidence-based improvements in access, quality, and cost of health care and to promote and improve public health. The Georgia Tech Research Institute's Center for Health Analytics and Informatics (GTRI-CHAI) is named as APCD Administrator in the APCD statute and charged with responsibilities including protecting patient privacy, determining the scope and process of data collection, and conducting APCD reporting and data dissemination.

The focus for calendar year 2023 was to implement and operationalize the GA APCD. The APCD implementation has been a collaborative effort led by the Office of Health Strategy and Coordination (OHSC) and GTRI-CHAI and supported by multiple entities including the Georgia Data Analytics Center (GDAC), Georgia Technology Authority (GTA) and Onpoint Health Data.

Over the past 12 months, the GA APCD team has accomplished the following:

- Published the Rules and Data Submission Guide;
- Deployed the submitter registration portal;
- Deployed the data submission portal;
- Configured the GDAC Amazon Web Services (AWS) Analytics Environment;
- Conducted submitter onboarding training webinars;
- Met with payers/submitters, healthcare associations, business associations, health policy and community advocacy groups, and Managed Care Organizations;
- Worked with and supported submitters to meet submission milestones;
- Completed mandatory submitter onboarding for medical and pharmacy claims for the years 2018-2023;
- Began onboarding Dental Submitters;
- Established a Data Governance Planning Team to provide advice and expertise around data release policies and procedures;
- Developed data release policies and procedures;
- Finalized a data use agreement for non-governmental entities seeking to utilize GA APCD data;
- Launched the GA APCD website;
- Began analysis on the use cases defined by the APCD Use Case Workgroup;
-  Provided summary data to the Office of Commissioner of Insurance and Safety Fire (OCI) regarding median reimbursed rates for medical procedures in compliance with No Surprise Billing legislation;
- Engaged the APCD and National Association of Health Data Organizations (NAHDO) community through conference attendance and presentations, and participation with the APCD CEO Roundtable;

The following report includes details on the aforementioned activities as well as required reporting as defined by O.C.G.A. § 31-53-49(a).

## 2  Introduction

In 2020, Senate Bill 482amended Title 31, Chapter 53 of the O.C.G.A. to provide for the establishment of a Georgia All-Payer Claims Database (GA APCD). The objectives of the GA APCD include becoming a resource to inform data-driven, evidence-based improvements in access, quality, and cost of health care and to promote and improve public health. Specific uses for the APCD as identified in O.C.G.A. § 31-53-44 include:

- Establishing baseline health care cost information;
- Monitoring and analyzing health care costs;
- Assessing population health;
- Measuring utilization of health care services;
- Identifying health disparities;
- Informing consumers of cost and quality of health care;
- Supporting the planning and evaluation of health care operations and care;
- Improving coordination of care;
- Enabling oversight of health insurance premium medical loss ratios; and
- Conducting waste, fraud, and abuse studies.

The APCD statute appointed the Georgia Tech Research Institute's Center for Health Analytics and Informatics (GTRI-CHAI) as Administrator for the APCD. The APCD Administrator's responsibilities, as enumerated in O.C.G.A. § 31-53-45(a), include reporting annually to the Governor and the General Assembly on the APCD implementation status, and any recommendations for statutory or regulatory changes that would help advance the APCD.

This past year, the APCD began receiving data submissions and has accumulated more than 890 million medical claims covering over 55% of the state population, all while maintaining the highest levels of privacy and security. The quality of data received is robust, and the APCD shows significant promise in becoming a transformative resource for the state of Georgia and its citizens. GTRI is pleased to submit this Administrator's report for the 2023 calendar year.

# 3 Statutory Reporting

Table 1 enumerates the required reporting areas per GA Code § 31-53-49(a).

**Table 1: Statutory Reporting**

| Reporting Category | Reporting Requirements from § 31-53-49(a) | Status |
|---|---|---|
| **Policy Development** | *(1) Any policies established or revised pursuant to state and federal medical privacy laws, including the federal Health Insurance Portability and Accountability Act of 1996, P.L. 104-191, as amended;* | During this reporting year, no policies pursuant to State and Federal health privacy laws were established or revised. |
| **Data Requests** | *(2) The number of requests for data and reports from the GAPCD, whether the request was submitted by a state agency or private entity, the purpose of the project, a list of the requests for which the administrator was advised that the release was consistent with rule and the federal Health Insurance Portability and Accountability Act of 1996, P.L. 104-191, as amended, and a list of the requests not recommended for release* | The APCD has not yet begun accepting requests for data and reports. |
| **Data Requests** | *(3) For each request recommended, the administrator must provide the federal regulation pursuant to which the use or disclosure was recommended, and whether a data use agreement or limited data set data use agreement was executed for the use or disclosure* | The APCD has not yet begun accepting requests for data and reports. |
| **Incident Reporting** | *(4) A description of any data breaches, actions taken to provide notifications, if applicable, and actions taken to prevent a recurrence* | There were no data breaches or security incidents. |
| **APCD Data Use** | *(5) The uses of the data in the GAPCD* | The APCD has not yet begun accepting data requests. The Administrator has provided summary data to the Office of Commissioner of Insurance and Safety Fire (OCI) regarding median reimbursed rates for medical procedures in compliance with No Surprise Billing legislation. |

| APCD Data Use | *(6) Public studies produced by the administrator* | The Administrator will begin producing and releasing public studies in CY 2024 covering multiple cost transparency and population health use cases (see section 4.3). |
|---|---|---|
| **Financials** | *(7) The cost of administering the GAPCD, the sources of the funding, and the total revenue taken in by the GAPCD* | See budget details below. |
| **Data Requests** | *(8) The recipients of the data, the purposes of the data requests, and whether a fee was charged for the data* | The APCD has not yet begun accepting requests for data and reports. |
| **Financials** | *(9) A fee schedule displaying the fees for providing custom data reports from the GAPCD* | The APCD has not yet begun accepting requests for custom data reports. The fee schedule for these reports will be published in CY 2024. |

The implementation budget for APCD is $9,835,000, and remains on track. To date, the total expenditure for the project amounts to $4,895,338. Federal matching funds for APCD implementation costs significantly supplement state funding.

**Table 2: State Fiscal Year Funding Schedule**

|  | **FY22** | **FY23** | **FY24** |
|---|---|---|---|
| Total State Budget | $2,815,000 | $1,230,000 | $ 800,000 |

**Table 3: Total Project Spend**

| FUNCTION | 2022 SPENT | 2023 SPENT | TOTAL | STATE RESPONSIBILITY |
|---|---|---|---|---|
| **Project Management** | $663,986 | $337,201 | $1,001,187 | $100,119 |
| **Data Collection Supplier** | $50,800 | $1,342,575 | $1,393,375 | $139,338 |
| **Administration & Analytics** | $905,687 | $1,587,706 | $2,493,392 | $249,339 |
| **Miscellaneous** | $4,884 | $2,500 | $7,384 | $738 |
| **Total** | **$1,625,357** | **$3,269,982** | **$4,895,338** | **$489,534** |

# 4 APCD Implementation Update

The APCD implementation has been a collaborative effort led by the Office of Health Strategy and Coordination (OHSC) and the Georgia Tech Research Institute (GTRI), supported by multiple entities. Collaborators include the Georgia Data Analytics Center (GDAC) and Georgia Technology Authority (GTA). Collaborator roles are shown in Table 4.

**Table 4: GA APCD Collaborators**

| ORGANIZATION | GA APCD ROLE |
|---|---|
| Office of Health Strategy and Coordination | • Mandated to establish and implement the APCD |
| Georgia Tech Research Institute<br>Center for Health Analytics and Informatics | • Statutory APCD Administrator<br>• APCD analytics and reporting |
| Georgia Technology Authority<br>Technology Empowerment Fund | • Project assurance |
| Georgia Data Analytics Center | • Host and administer the APCD analytics environment |
| Onpoint Health Data | • Data collection vendor |

## 4.1 Submitter Onboarding and Data Collection

The GA APCD was successfully implemented in CY2023, meeting targeted milestones for the majority of mandatory submitters (Figure 1).
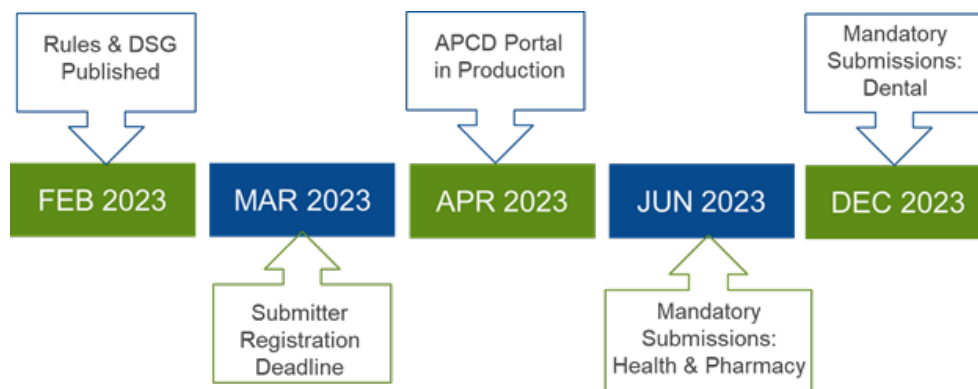


**Figure 1: 2023 Submitter Onboarding Timeline**

In the first half of 2023, mandatory submitter onboarding was completed. Medical, Pharmacy and Dental data submissions began in the second half of 2023, following the submission timeline shown in Figure 2Figure 3.

Submitter onboarding activities included:

- Rules and Data Submission Guide (DSG) publication
- Submitter trainings and webinars
- Submitter registration
- OnPoint data collection portal in production
- Test submissions for data formatting validation
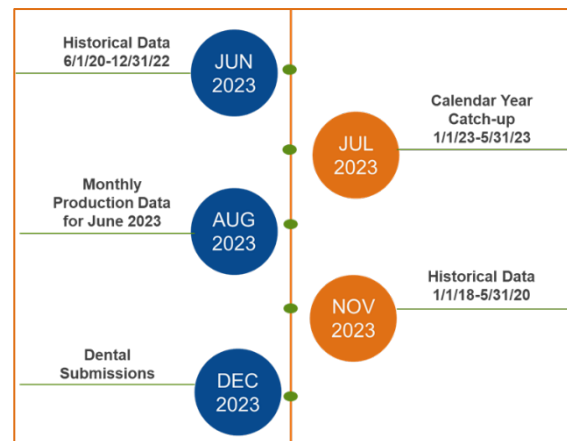- Historical, calendar year catch-up and monthly production data submissions



Figure 2: Medical and Pharmacy Submission Schedule

The GA APCD data collection kicked off in June, 2023 with Medical and Pharmacy historical data submissions. Submission deadlines were staggered throughout the year, with regular monthly data submissions commencing in August 2023 (Figure 2).

Dental submissions began in December 2023, and will continue in 2024 following a similar staggered approach for historical, calendar year catch-up and monthly data submissions (Figure 3).
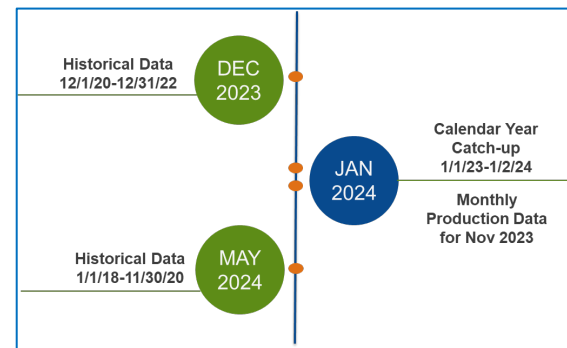


Figure 3: Dental Submission Schedule

As of November 2023, the APCD had received claims data submissions from 29 submitters. Figure 4: GA APCD Snapshot provides an overview of the contents of the APCD as of November, 2023. The GA APCD has data related to more than 862 million claims from the years 2018-2023, and it contains data pertaining to more than 9.7 million patients (2018-2023). The APCD contains medical insurance eligibility for 45% of Georgia residents, pharmacy insurance eligibility for 63% of Georgia residents, and dental insurance eligibility for 23% of Georgia residents.
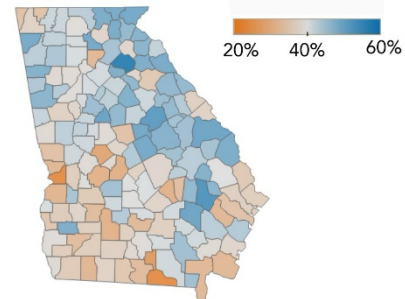
Original Medicare claims will be obtained from the Centers for Medicare and Medicaid Services (CMS) Research Data Assistance Center (ResDAC).
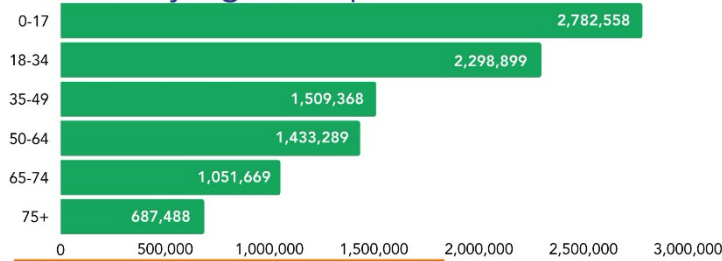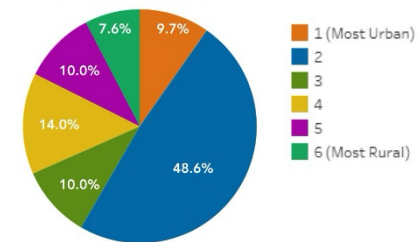
**Figure 4: GA APCD Snapshot**

## 4.2 Data Privacy, Security and Access

A core pillar for GA APCD design and implementation is to develop rigorous and comprehensive data governance policies and procedures, ensure data utilization aligns with the GA APCD goals and objectives, and permit the access and release of data for approved uses.

### 4.2.1 Data Governance Planning

The APCD Administrator established a Data Governance Planning Team (DGPT) to define the principles, policies, and application process for use of GA APCD data. The DGPT provided guidance and input on the following topics: ensuring that the purpose of each data request is aligned with APCD objectives; tailoring data and information offerings to match the requestor type and capabilities; and evaluating the nature of the data requested such as identifiability, granularity, and sensitivity. The data release policies and procedures to be published will reflect the recommendations made by the Data Governance Planning Team. The data release policies will be published on the APCD website.

The following people serve on the Data Governance Planning Team:

- Jason Bearden, MBA, MHA: President, CareSource Georgia Market
- Erin Fuse Brown, JD, MPH: Director, Georgia State University Center for Law, Health & Society
- Dean Burke, MD: Chief Medical Officer, Georgia Department of Community Health
- Carlton Dampier, MD: Pediatric Hematologist/Oncologist & Institutional Review Board Chair, Aflac Cancer and Blood Disorders Center of Children's Healthcare of Atlanta
- Neal Dickert, MD, PhD: Cardiologist & Associate Professor of Medicine, Emory School of Medicine; Senior Faculty Fellow, Emory Center for Ethics
- Elizabeth Holcomb, JD, MPH: Director, Office of Health Strategy and Coordination
- Karen Minyard, MN, PhD: CEO, Department of Public Management and Policy, Georgia Health Policy Center
- D'Andrea Morning, Esq: Vice President, Corporate Compliance & Chief Compliance and Privacy Officer, Grady Health System
- Robert Palmer, PhD, MSN, RN: Director of Informatics, Georgia Department of Public Health
- Angie Snyder, PhD, MPH: Director of Health Policy and Financing & Research Professor, Georgia Health Policy Center

Figure 5 shows the milestones in the data governance planning process. A Data Release Review Committee (DRRC) will be formed in 2024. The DRRC will be responsible for reviewing data request applications and advising the administrator on whether requests are consistent with the objectives of the APCD; aim to improve the health, wellbeing and cost of care in the State of Georgia; and comply with best practices for data privacy and security. The Data Governance Planning Team recommendations will be incorporated into the guidance provided to the DRRC when reviewing data request applications.
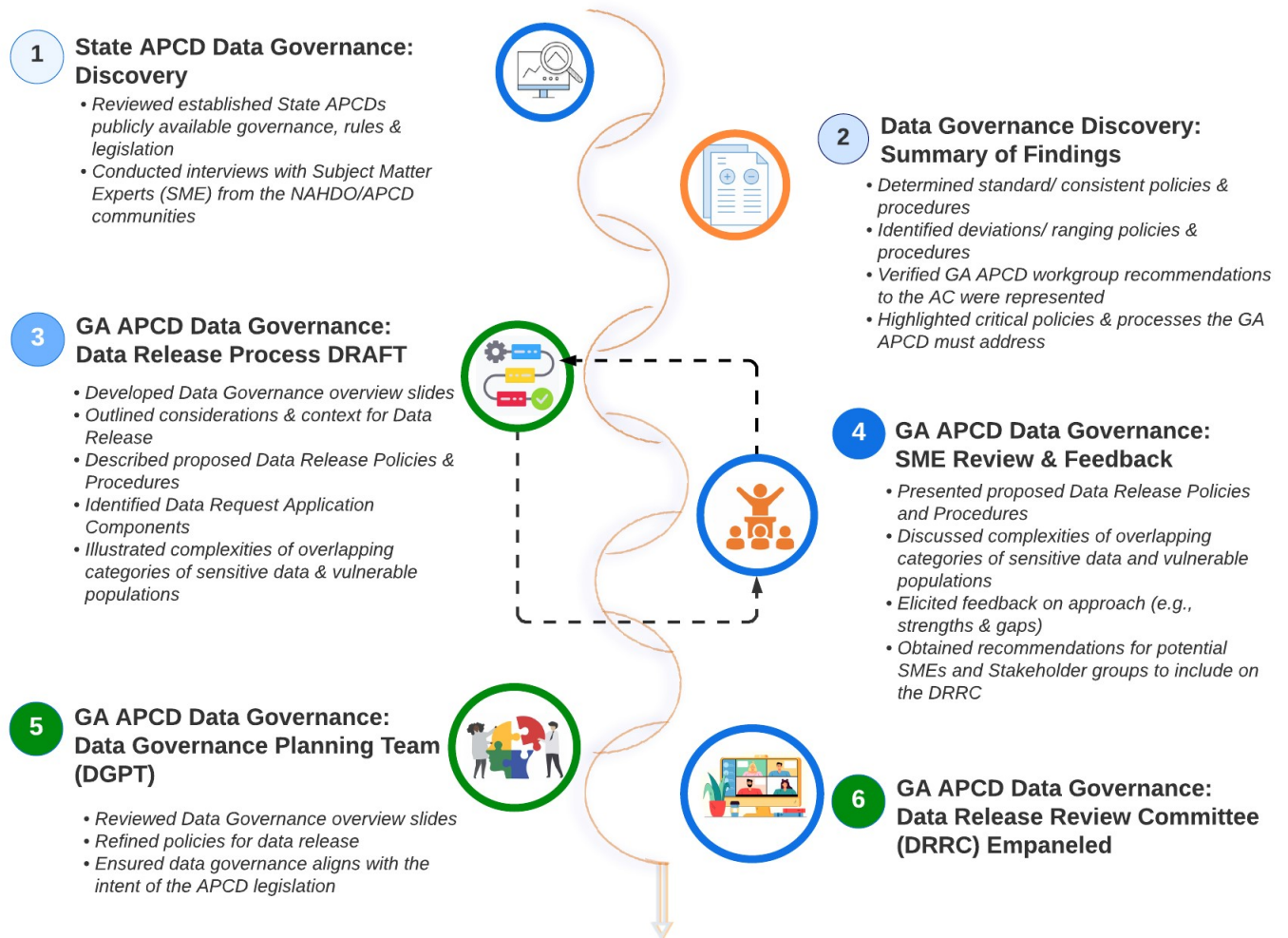
**Figure 5: Data Governance Planning Process**

## 4.2.2 Overview of GA APCD Data Access Mechanisms

A significant amount of valuable data will be made publicly available by the APCD that should address the information needs of many Georgians, including on topics of healthcare cost, quality, and population health. Public data from the APCD will be released in the form of reports, data sets, and interactive dashboards. Data sets will contain aggregated, de-identified data. A large quantity of resources will be available to the public free of charge. An overview of future mechanisms for accessing data from the APCD was published to the APCD website in November, 2023.

For organizations that are familiar with analysis of medical claims and have the necessary security and methodological expertise, Non-Public "claims-level" data can address questions not covered by public data releases. Types of data requestors include researchers, state/federal entities, payers, providers/health systems, industry, and employers. Data requesters must be affiliated with an organization.

All Non-Public Data releases must align with GA APCD objectives. Within the data request application, the requestor must justify how the data use will benefit the public. Data requestors

must also have the methodological expertise and security infrastructure to analyze and protect the data. Data requests should be limited to the minimum data necessary to answer a research question. Additional justification may be required for certain data elements to ensure antitrust compliance and to protect sensitive data.

Requestors of Non-Public Data will need to submit an application, including the following information:
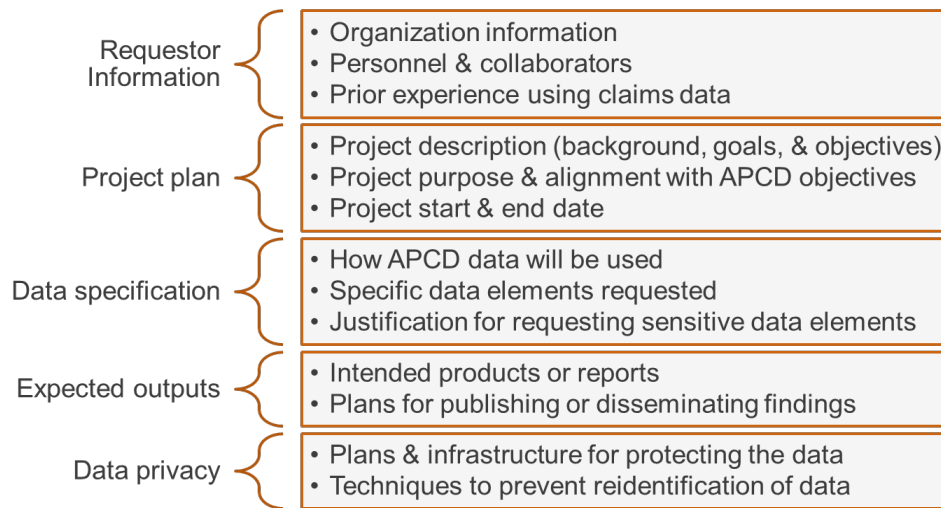
| Requestor Information | • Organization information<br>• Personnel & collaborators<br>• Prior experience using claims data |
|---|---|
| Project plan | • Project description (background, goals, & objectives)<br>• Project purpose & alignment with APCD objectives<br>• Project start & end date |
| Data specification | • How APCD data will be used<br>• Specific data elements requested<br>• Justification for requesting sensitive data elements |
| Expected outputs | • Intended products or reports<br>• Plans for publishing or disseminating findings |
| Data privacy | • Plans & infrastructure for protecting the data<br>• Techniques to prevent reidentification of data |

**Figure 6: Data Request Application Overview**

Additional application elements may include:
- A copy of an Institutional Review Board (IRB) protocol for the research
- A Data Use Agreement (DUA)
- A Data Management Plan

The Non-Public Data Request Process is shown in Figure 7. Data requestors will begin by submitting a pre-application. An Intake Coordinator will work with the data requestor to refine the request. The data requestor will then complete and submit the data request application. The application will undergo an intake process to verify it is complete and ready for review. If necessary, the application will be reviewed by a Security Team. Next, the Data Release Review Committee (DRRC) will review the application and make a recommendation to the administrator regarding whether to approve the data release. The administrator will make the final release decision.

**1** Submit pre-application

**2** Work with Intake Coordinator to refine request

**3** Submit data request application

**4** Application intake

**5** Application review by Security Team (if necessary)

**6** Application review by Data Release Review Committee (DRRC)

**7** Administrator makes final release decision

**8** Execute Data Use Agreement (DUA) and make payment
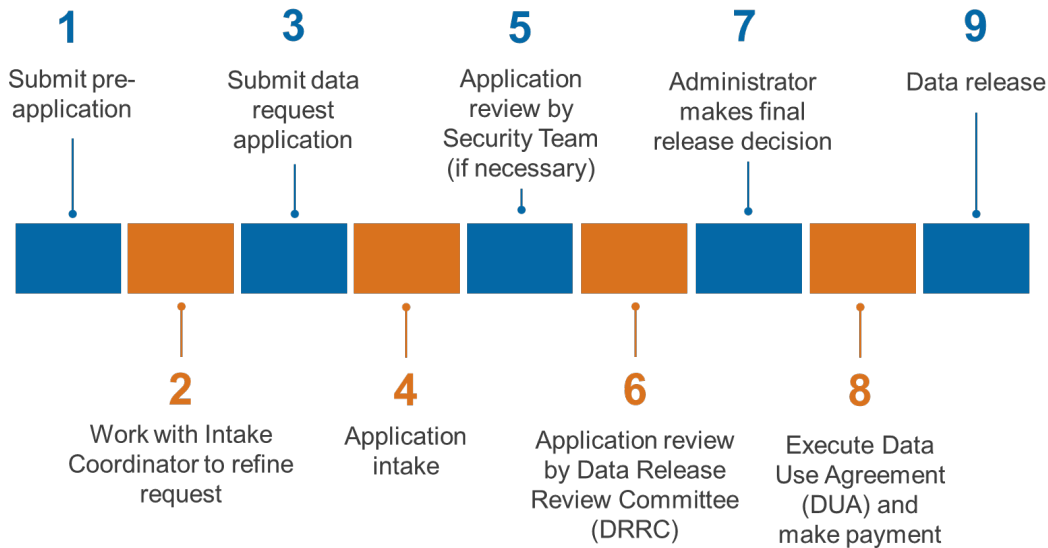
**9** Data release

Figure 7: Data Request, Review and Release Process

The full data request application will be released in CY 2024. Figure 8 shows the anticipated timeline for when the GA APCD will begin accepting non-public data requests.
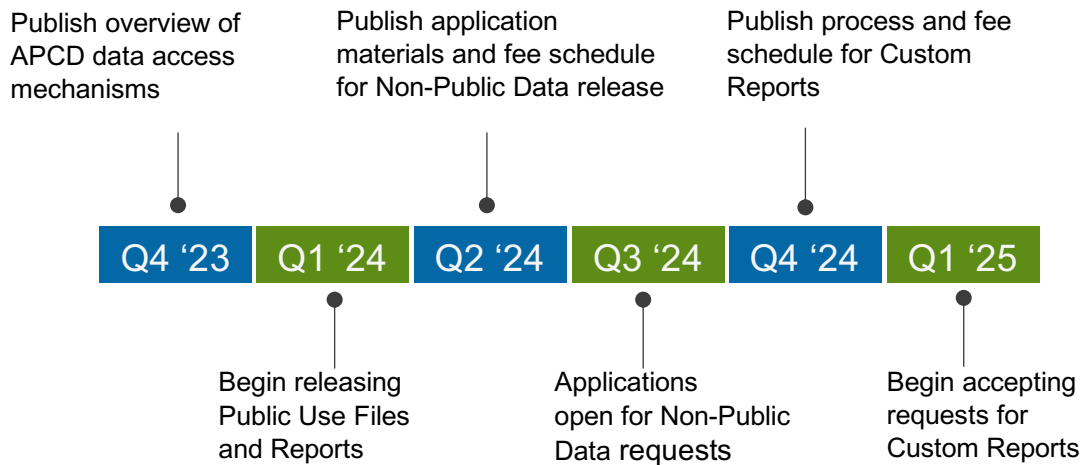


Publish overview of APCD data access mechanisms

Publish application materials and fee schedule for Non-Public Data release

Publish process and fee schedule for Custom Reports

Q4 '23 | Q1 '24 | Q2 '24 | Q3 '24 | Q4 '24 | Q1 '25

Begin releasing Public Use Files and Reports

Applications open for Non-Public Data requests

Begin accepting requests for Custom Reports

Figure 8: Anticipated timeline for APCD data request applications

## 4.3 Use Cases

The GA APCD will be leveraged for a wide range of use cases, including analyses conducted by the Administrator based on priority state needs, independent analyses conducted by state entities, and independent analyses conducted by third party entities such as universities and research organizations. The Administrator began analysis of APCD data in October 2023 to meet the objectives defined by the APCD Use Case Workgroup. The use cases defined by the Workgroup are shown in Table 5.

Table 5: Use Cases defined by the APCD Use Case Workgroup

| COST AND UTILIZATION | POPULATION HEALTH | HEALTHCARE QUALITY |
|---|---|---|
| • Total Costs of Care<br>• Chronic Disease Costs of Care<br>• Avoidable Emergency Department Costs<br>• Behavioral Health Costs of Care<br>• Median reimbursed rates for No Surprise Billing<br>• Pharmaceutical Costs | • Chronic Disease Trends<br>• Cancer Trends<br>• Behavioral Health Trends<br>• Maternal Health | • Low-Value Care<br>• Preventive Screening |

The Administrator delivered aggregated data on median reimbursed rates to the Office of Commissioner of Insurance and Safety Fire (OCI) in November 2023.

In 2024, the Administrator will deliver a combination of public reports, dashboards, and datasets to address the remaining use cases. The Use Case Workgroup will be reconvened to define a second round of priority analyses.

## 4.4 State and Federal Harmonization

The GA APCD continues to support and promote State and Federal harmonization efforts, and with more than 20-years' experience implementing APCDs around the country, the GA APCD Data Collection Vendor, Onpoint Health Data, has proven to be a critical partner for ensuring alignment with state initiatives.

The GA APCD design reflects significant effort to align with best practices and approaches from APCDs across the country. While there is high variability across APCDs, in part due to legislative objectives and nuances for each state, the GA APCD is in a strong position to both learn from other states, and to forge a path to best meet the needs and objectives of the citizens of Georgia. The Georgia team regularly engaged representatives from state APCDs and the APCD Council to inform decision-making.

The GA APCD has joined a growing number of states to adopt the APCD Council's Common Data Layout (APCD-CDL) v2.1. The GA APCD data submission guide also incorporates some key data

elements from APCD-CDL v3.0 in order to support future adoption while minimizing burden on current submitters.

The GA APCD team continues to engage the broader APCD community through involvement with the APCD-Council and the National Association for Health Data Organizations (NAHDO). These efforts ensure that the GA APCD reflects the most current standards, and that the Administrator remains informed and aware of the Federal landscape for policies and procedures. The GA APCD team increased visibility in CY 2023 through participation in the NAHDO In-Person Networking Event in Boston, MA, membership of the APCD CEO-Roundtable, and facilitating multiple sessions during NAHDO's 38th Annual Conference.
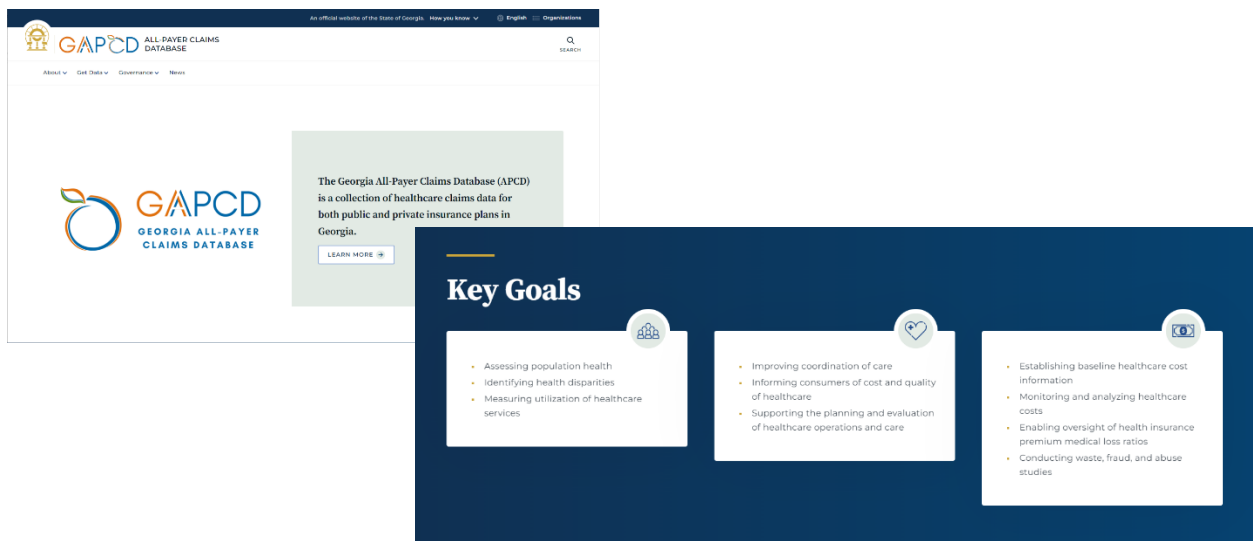
## 4.5   Outreach

Outreach is an ongoing priority to ensure that GA APCD stakeholders are actively aware of the purpose, status, contents and how to access the APCD. The Administrator has deployed multiple strategies to inform a wide range of stakeholders, including meeting with submitters, launching the APCD website, and presenting information about the APCD in multiple formats.

### 4.5.1   Submitter Engagement

Submitter engagement efforts in the first half of CY 2023 were primarily focused on APCD onboarding activities, such as training webinars, identifying mandatory submitters, meeting and working with submitters to address questions and concerns, and assisting submitters as they prepared data. Detailed information about the submitter onboarding process and timeline is provided in section 0.

### 4.5.2   Website

The APCD website https://apcd.georgia.gov launched in Summer 2023 to serve as a resource for the Georgia public, APCD data submitters, data users, and prospective data requestors. The website includes information such as Submitter Rules, Data Submission Guide, Reports and Dashboards, Use Cases, data access resources, and archived Advisory Committee presentations. Beginning in 2024, users will be able to download public data and reports directly from the Public Data page.

### 4.5.3  Publications and Presentations

Efforts to reach a broader group of stakeholders included presentations and news releases. These included:

- Duke, J., Denham, M., Razin, V., Hilton, C., Hightower, C., Siraj, M., Fitch, N., Ramirez, A., King, D., Starr, R. *All-Payer Claims Database*, poster presented at GTRI State Impact Symposium, in Atlanta, GA, October 10, 2023

- Georgia Tech Research Institute Research News: *Claims Database Will Provide Clearer Picture of Health in Georgia.* November 6, 2023

- *Public Insurance Claim Database Will Give a Better Look at Health Care Access in Georgia,* by Sophia Gratas, Georgia Public Broadcasting News. December 14, 2023. https://www.gpb.org/news/2023/12/14/public-insurance-claim-database-will-give-better-look-at-health-care-access-in

Outreach efforts in the year ahead will focus on partnering with OHSC to engage stakeholders in the community and raise awareness about the tools and resources available through the GA ACPD. This will include:

- Employer outreach to encourage voluntary submissions;
- Community outreach and raising APCD awareness through social media and other communication platforms; and
- Expanding State and Federal harmonization efforts.

## 5   Conclusion

In 2023, the collaborative efforts of the GA APCD team brought about significant progress towards the vision of establishing a robust resource for health cost transparency and improved health care in Georgia. The GA team published the Rules and Data Submission Guide in February, completed submitter registration in March, opened the data collection portal for production in April and began receiving live data submissions in June. By November, mandatory medical and pharmacy submitters were onboarded and in monthly production, for the years 2018-2023. In the coming year, the APCD will continue to become more robust, including delivery of a series of analytic reports, dashboards, and datasets, as well the opening of the custom data review and request process for researchers and other approved users.

The Administrator would like to thank the entire Georgia team, the Advisory Committee, the Data Governance Planning Team, submitters, and stakeholders for their work in making the GA APCD a success.