

Data Submission and Data Release Rules

May 5, 2021



Follow up on questions from last Board meeting



- Fees paid from third party (non-State) Authorized Users directly to vendor (Draft Rule 9.402)
 - IT contract with a zero-dollar deliverable (restricted data set extracts or access provided to third party (non-State) authorized users and billed directly to those users) in compliance with Bulletin 3.5
 - Onpoint contract reflects provisions in draft Rule and went through State procurement process
 - Contract includes fees (subject to change over time) and permits fees to be charged by Onpoint to third party Authorize User directly.
 - Contract went through State procurement approval process in accordance with requirements of Bulletin 3.5 and was approved by ADS Procurement Advisory Team.
- Fee schedule or list of fees charged by vendor.
 - Fees are stated in Onpoint contract, which is available on GMCB website.
 - \$5,250 per extract, subject to change over time, and a one-time set up fee of \$550.
 - SAE access pricing per month based on number of seats

Follow up on questions from last Board meeting (continued)



- Time frame for changes to Reporting Manuals (Section 8.400):
 - BCBSVT comment to extend the period for implementation of change to manual to 180 days (from 90 days) following DGC approval, and provide 90 days for submission of test files
 - Actual timing from initial notice to implementation is longer, as there is notice period of at least 30 days prior to DGC vote
 - In practice, with DGC meeting every other month, actual timing of manual revisions could be longer
 - Test file submission under 8.203(c) is 60 days prior to initial submissions or revisions of manuals, but actual time from initial notice is longer because of comment period
 - Review of certain other state's approaches to changes in all-payer claims database reporting manuals
 - Some states update manuals on a set yearly schedule
 - Other states that don't have a fixed schedule for manual updates have a range of compliance times: NY and WA at 120 days, TN, NH, ME at 180 days.

Follow up on questions from last Board meeting (continued)



- Updated recommendation for time frame for changes to Reporting Manuals (Section 8.400):
 - Extend time period for implementation to 120 days (from 90 days) following DGC approval of revisions
 - Revise Section 8.403 to have DGC consider comments from submitters regarding time required to comply with changes, and permit DGC to extend time period for implementation beyond 120 days
 - Revised wording for Section 8.403 on following slide

Follow up on questions from last Board meeting (continued)



- Revised proposal Section 8.403:
 - Revisions or modifications to reporting manuals shall become effective ~~ninety (90)~~ one hundred twenty (120) days, or such longer time specified by the Data Governance Council, after the Data Governance Council votes to approve them. The Data Governance Council shall review all comments related to the time required by submitters to comply with any revisions or modifications to the reporting manuals, and the Council shall consider such comments when determining whether to specify a time period longer than one hundred twenty days before revisions or modifications become effective. During that ~~90~~ 120-day period (or longer, if specified by the Data Governance Council), affected mandatory submitters shall work with the Board and the data collection vendor to ensure the revisions or modifications can be implemented effectively. For good cause, an affected submitter may request a reasonable extension to the ~~90~~ 120-day (or longer, if specified by the Data Governance Council) implementation period, which the Council may grant as it deems appropriate. Any such request shall be submitted to the Council chair in writing and contain the length of the extension requested and a detailed explanation as to why there is good cause to grant the extension.

Questions, Comments, Potential Vote



- Questions or comments?
- Proposed motion language:

The Green Mountain Care Board approves the draft proposed Rule 8.000 (Data Submission) and Rule 9.000 (Data Release) with changes discussed in the Board meeting as replacements for BISHCA rule H-2008-01, and the Board instructs its staff and legal teams to proceed with the formal rulemaking under the Vermont APA for both rules.