



State of Vermont
Green Mountain Care Board
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Data Stewardship Principles and Policies

Adopted by the
Green Mountain Care Board Data Governance Council
April 2019

Version 2.0

Introduction

On September 4, 2014, the Green Mountain Care Board (GMCB, “the Board”) approved the development of a data governance and stewardship program and the formation of the Data Governance Council to implement the program. The data governance and stewardship program is intended to provide a structured approach to the management of data resources at the GMCB and focuses on four key areas:

- **Risk Management** - Implementing and enforcing the most appropriate data privacy and security standards and practices.
- **Data Quality** - Establishing data stewardship to promote the highest possible quality of GMCB’s data resources.
- **Program Sustainability** - Evaluating opportunities to optimize sustainability and revenue for GMCB’s data stewardship program.
- **Data Release** - Supporting clear processes for the evaluation of data requests and the release of data to Vermont State Agencies and Instrumentalities¹, and to non-State entities.

In order to guide the Data Governance Council’s decision-making in these four key areas, the Council began its work by drafting Data Stewardship Principles and Policies. The Council drafted seven principles and corresponding policies in its first version. In 2019, the Council revised these principles and policies and reorganized them into four principles with corresponding policies to align with the four key areas of governance and stewardship.

Upon adoption by the Board the Principles and Policies may be referenced and accompany any GMCB data governance-related documents, including the following:

- Data Submission Rule and Data Release Rule
- Data Submission Guidance
- Data Governance Council Charter
- Data Use and Disclosure Procedures Guide
- VHCURES Data Submission Guide

Please note that while Principle 1 describes the privacy of Vermonters as the highest priority, the remaining principles are not presented in a rank order of importance.

¹State Agencies and Instrumentalities are defined as: 1) Partially or fully funded by the state; 2) Performing research directed by the state; and 3) Under the direction of a state official.

See GMCB Memorandum: *Criteria for Defining State Agencies and Instrumentalities*; Jan 2018;
https://gmcboard.vermont.gov/sites/gmcb/files/documents/State_Agency_Criteria_Memorandum.pdf

Principle 1: Implementing and enforcing the most appropriate data privacy and security standards and practices.

Policy 1.1: The highest priority for GMCB data governance is the protection of individuals' privacy and their protected health information.

Implementation:

- GMCB data use and disclosure procedures are designed to prevent improper direct disclosure or any derivation of the data that could result in the identification of individuals and their protected health information.
- GMCB release of limited-use data is restricted to the use of the minimum necessary data required to support the goals and objectives approved under a data use agreement. No other uses of, or access to, limited-use data sets are permitted.
- Linking of data under GMCB's stewardship to other data sets will only be permitted if and to the extent it is approved under a data use agreement.
- No person may use or access data that is not otherwise available for public use, other than pursuant to an approved data use agreement.
- Data requestors must demonstrate adequate procedures and protections for data privacy and security.
- GMCB's procedures for data release shall be published in GMCB's *Data Use and Disclosure Procedures Guide*.

Principle 2: Establishing data stewardship to promote the highest possible quality of GMCB's data resources.

Policy 2.1: GMCB data will be maintained in a manner that maximizes transparency.

Implementation:

- Data shall be clearly mapped from its source field(s) to the released format, including references to any proprietary software.

Policy 2.2: Data quality will be monitored and continuously improved.

Implementation:

- The Board will maintain submission requirements that maximize data quality. Data quality results will be regularly reviewed and quality monitoring processes will be updated as needed to continually improve data quality.
- Data will be regularly validated. Data submitters will be engaged to validate the data they have provided. Data validation measures, if available, will be accessible by analysts.
- Data submitters will have the opportunity to influence changes in technical specifications when proposed.
- Proposals to change the scope or accessibility of data will consider feasibility, burden on data submitter, cost, and relevance of use case to research agenda, impact on data quality, privacy, anti-trust concerns, and general usefulness of the proposed change.

Policy 2.3: GMCB data will support timely, consistent, and actionable analyses.

Implementation:

- The Board will set analytic priorities relevant to recommendations provided in the GMCB Analytic Plan.
- Data will be available for timely analysis. Timeliness will be balanced against data quality. Data must be of high quality to produce good, trusted results, but quality efforts cannot become so consuming as to prevent analytic work from going forward.
- Data quality improvement work will be guided by analytic needs.
- Databases will include common definitions to support consistent analyses. Fields will be added to the analytic files to support work using areas where definitional difference may produce conflicting analysis.

Principle 3: Evaluating opportunities to optimize sustainability and revenue for GMCB's data stewardship program.

Policy 3.1: GMCB will strive for sustainability, relevance, and accessibility of its data resources.

Implementation:

- GMCB will work continuously to sustain the relevance and utility of its data assets in the changing health care reform landscape.
- Vermont State Agencies and Instrumentalities are not charged fees for approved data extracts generated by GMCB's data aggregation vendor.
- The Board may pursue a fee structure for data release to collect revenue from entities other than Vermont State Agencies and Instrumentalities, whether operating within or outside of Vermont, to ensure benefit to Vermonters and financial sustainability of the data governance and stewardship program.
- The Board will report on costs annually.

Principle 4: Supporting clear processes for the evaluation of data requests and the release of data to Vermont State Agencies and Instrumentalities, and to non-State entities.

Policy 4.1: The use of GMCB data resources will support GMCB’s mission and mandates and comply with established conditions of release.

Implementation:

- GMCB data release practices align with GMCB’s responsibilities for data stewardship and support public interest around the cost, use, and efficiency of health care services in a manner that does not violate federal antitrust, trade secret, and/or other legal protections.

Policy 4.2: GMCB data resources are used to support the study of health and health services that serves the public interest and benefits Vermonters.

Implementation:

- GMCB will maintain data release requirements for data use and disclosure that are designed to balance data protection with data access.
- Data release considerations will include the following criteria:
 - a) the competency and expertise of requestors to conduct the proposed study;
 - b) that requestors provide information regarding the source of funding;
 - c) that requestors provide a compelling argument justifying access to the data set and its relationship to stated objectives; and,
 - d) intended use, including a focused review of the potential commercial nature of the request.

Document Revision History			
Version	Delivery Date	Author	Notes
1.0	October 16, 2014	Peter Alfrey, BerryDunn	For review by the GMCB Data Governance Council.
1.1	November 4, 2014	David Regan, BerryDunn Stacey Murdock GMCB	Combined revisions from the 10/16 Data Governance Council meeting. Added Principle 7.
1.2	January 8, 2015	Stacey Murdock GMCB	Removed Policy 6.2 (a). Board members voted unanimously to adopt this version of the document.
2.0	April 2, 2019	Kathryn O'Neill GMCB	Presented complete revision of Principles and Policies per new Council formed in 2018.