## OneCare Vermont

# Keeping Data Safe in Transition to New Data Platform

OneCare is engaged in the planning and implementation steps necessary to make a smooth transition to a new data platform by the summer of 2023. This new platform will enhance OneCare's data and analytics services provided to participants in the OneCare Vermont accountable care organization (ACO). ACO data is essential to success under ACO programs and here we are sharing some key information for you on how we are keeping data safe through this transition:

## I. Physical Separation Requirements

- All data provided to OneCare is securely brought into physical and/or cloud-based storage areas to clean, organize, and transform it into reports and tools to support OneCare's network.
  - *Storage areas will be set up to ensure all ACO-related data is kept separate from other non-ACO information.*
  - *These firewalls are tested to ensure appropriate protections remain in place.*
- Access to ACO data are limited to select staff members who have a need-to-know and require access in order to support ACO activities.
  - *OneCare approves all provisioned users.*
- OneCare follows CMS requirements and industry standards for secure protection of electronic information.

## II. Governance Structure

- OneCare manages access to data through policies and procedures that describe who has permission to view the information and in what circumstances.
- OneCare holds our data and analytics vendors to these same standards. If questions arise, OneCare consults with legal and compliance experts to inform business decisions (e.g. if a network participant asks for a unique type or amount of data) before any data are shared.
- OneCare maintains oversight for the data in compliance with all contracts and regulatory requirements.
- A Steering Committee will be established to monitor performance under the new arrangement and to make recommendations for changes and/or improvements.
- OneCare will continue to seek out feedback from its participants on how to continually refine and improve data and reports. You can also contact us at any time if you have ideas or suggestions.

## III. Auditing/Monitoring

- OneCare compliance and cybersecurity teams will conduct regular audits of data use.
- OneCare will monitor the quality of vendor performance and will report to its Board on a quarterly basis.

## IV. Questions and Concerns?

Keeping data safe is our top priority—please do contact us with any additional questions or concerns.

- Contact Josiah Mueller, OneCare Director of Value Based Care, **Josiah.Mueller@OneCareVT.org**
- Greg Daniels, OneCare Chief Compliance and Privacy Officer, **Gregory.Daniels@OneCareVT.org**
- Compliance and Data Privacy Concerns, **Compliance@onecarevt.org**