November 23, 2016

RE: State of Washington All Payer Health Care Claims Database (WA-APCD)

WA-APCD Data Supplier,

The Office of Financial Management (OFM) is excited to have Oregon Health and Science University’s (OHSU) Center for Health Systems Effectiveness (CHSE) as the lead organization for the state of Washington all payer health care claims database (WA-APCD) and Onpoint Health Data as the data vendor. Together, we thank you for participating in the WA-APCD introductory onboarding webinars as the kick-off for Onpoint’s process of collecting input into the draft data submission guide (DSG) as per OFM’s rule\(^1\). During these webinars we heard the questions and concerns you expressed about what is ahead in setting up the WA-APCD.

To begin to address these questions and concerns, we are providing a recap of what we are working to accomplish and a look at the overall timelines involved. We are also producing a set of Frequently Asked Questions (FAQs) that will follow shortly.

The big picture:

As OFM discussed during the procurement and rules processes, the implementation of the WA-APCD is funded by two U.S. Centers for Medicare and Medicaid Services (CMS) Rate Review grants that end by September 30, 2017. By that date, all implementation activities of the WA-APCD must be completed.

Key aspects of the implementation work to be accomplished by this deadline include the collection and setup of the Group 1 historical data. Other elements of the work include establishing and operating the advisory committees whose work includes recommendations to put the requisite procedures in place to guide the WA-APCD work, and establishing the WA-APCD website. Additionally, OHSU will, as per the law\(^2\), publish the Fall 2017 Washington State Common Measure Set for Health Care Quality and Cost Report and quarterly reports thereafter.

The draft DSG leverages the APCD Council’s Common Data Layout (CDL), which is in progress, as a starting place in an effort to address the interest by all stakeholders in increased standardization across data collection initiatives nationally. In the ongoing work to adopt a national standard, the CDL has been reviewed by many health plans and their feedback has been provided to the APCD Council.\(^3\) Given that the CDL is still very much a work in progress, the WA-APCD DSG layout is being adapted to incorporate

\(^1\) WAC 82-75-070(2) Data Submission Guide [https://app.leg.wa.gov/wac/default.aspx?cite=82-75-070](https://app.leg.wa.gov/wac/default.aspx?cite=82-75-070)


\(^3\) [https://www.apcdcouncil.org/standards](https://www.apcdcouncil.org/standards)
Washington data submitters’ feedback as well as Onpoint’s experience in implementing APCDs across the country.

To meet the requirements of both the law and federal grants, OFM allowed for the grouping of data submitters and data submissions into two groups.

- **Group 1 submitters** consists of: Commercial health plans, including dental for insurers that write both health and dental; Medicare Advantage, Medicaid Managed Care Organizations, and the Washington Health Care Authority (including both Medicaid fee-for-service and Public Employee Benefits).
- **Group 2 submitters** consists of: Voluntary self-funded, Dental-only, and Workers compensation plans. Other data submitters to be considered for Group 2 or later include the CMS and its Medicare fee-for-service program.

By rule, the initial data submissions are to include historical claims data starting with dates of service beginning January 1, 2011 through December 31, 2016. Based on feedback received, OFM decided to amend the rule to change the historical data required to start with January 1, 2013. Group 1 submitters will be expected to include in their historical file submissions dates of service beginning January 1, 2013 through the most recent calendar-year quarter.

Given the importance of working together with the data submitters to clarify aspects of the data submission work, and to discuss the DSG feedback to date, OFM is requesting the data suppliers to participate in a conversation on December 1, 2016 10:00 a.m. to noon (West Coast time) in Olympia. OFM will host the meeting for in-person attendees; a teleconference line will be available to participate by phone too.

Following our data submitters conversation on December 1, the final WA-APCD implementation milestones and dates will be published. As a reference, the current timeline and milestones are listed in the table below. Our current thinking is to extend the data submitters’ feedback period through the following week to close on December 9. At the December 1 meeting, we would like to discuss how best to work with the data submitters that week on any topics that are unresolved or of concern.

**Current Timeline (grayed-out dates/milestones have already passed):**

<table>
<thead>
<tr>
<th>Date</th>
<th>Milestone</th>
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<tbody>
<tr>
<td>10/19-21/2016</td>
<td>Notification sent to Data Submitters alerting them to the need to register with Onpoint, the data vendor within 30 days, as per the law/rule⁵</td>
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<tr>
<td>10/26/2016</td>
<td>First draft Data Submission Guide sent to data submitters for comment</td>
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<tr>
<td>11/8/2016</td>
<td>Initial comments were due by data submitters on the draft Data Submission Guide to Onpoint</td>
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<tr>
<td>11/10/2016</td>
<td>Second draft of the Data Submission Guide sent to data submitters for comment</td>
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⁴ WAC 82-75-060 Historical data submission; note: WAC 82-75-060 has been reopened to amend the historical data period (CR 101 filed October 13, 2016)
⁵ WAC 82-75-040 Registration requirements
The overall timeframe for completion of all implementation activities by September 30, 2017, as originally detailed in the WA-APCD competitive procurement released in April 2016, is aggressive. We wish to work with the data submitters to craft an approach that meets this deadline in a way that makes the best use of data submitters’ and WA-APCD resources.

FAQs generated from the webinars and from feedback to date will be published shortly. These will provide answers and additional information about the project and data submission.

Thank you and we appreciate your support in this important initiative.

Sincerely,

Thea Mounts, OFM WA-APCD Program Director  
Ted von Glahn, OHSU’s WA-APCD Program Director  
Jim Harrison, Onpoint Health Data President/CEO

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6 WAC 82-75-050 Data submission schedule