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DRRC Criteria for the Release of Custom Reports and De-identified Data from the Colorado All Payer Claims Database (APCD)

For efficiency, the Data Release Review Committee (DRRC) shall review such requests using a criteria-based method. Specifically, the DRRC will provide the APCD Administrator with a set of criteria under which custom reports and de-identified data sets may be released. If a specific request meets the criteria provided, then the Administrator may deem it as recommended for release by the DRRC, and the DRRC will be provided with regularly updated information regarding such releases.

Ground Rules:

1. If there is any ambiguity in a Data Release Application (Application) with respect to the Ground Rules or Criteria, even after clarification has been requested and received, the Application will be referred to the DRRC for additional review.
2. Under HIPAA, a Data Use Agreement is not required for the release of a Custom Report or De-Identified Data set. However, a Data Use Agreement specifying the terms and conditions under which the information was released will be executed to protect APCD interests.
3. The proposed use of the APCD data must:
 - a. Be consistent with the statutory purpose of the APCD.
 - b. Improve health care or public health outcomes for Colorado residents.
 - c. Comply with HIPAA Privacy and Security Rule requirements.
 - d. Employ appropriate analytical methods.
4. The Data Use Agreement (Agreement) will include:
 - a. The purpose of the project as described in the Application.
 - b. Limitations on access to the approved APCD data.
 - c. Limitations on the release of results based on analysis of the APCD data.
 - d. Assurances by the Applicant that minimum cell-size and complimentary cell suppression techniques have been appropriately applied when the analysis is released.
 - e. The user must submit the final copy of any results, information or publications based on the APCD data to the APCD Administrator prior to any public release.

Release Criteria:

1. The APCD data that is the subject of the Application:
 - a. Includes only aggregated information, e.g., counts, totals, rates per 1,000 population, index values and other standard summary statistics or similar measures, or
 - b. Meets the HIPAA standard for the de-identification of protected health information (PHI) established at 45 CFR § 164.514(a). De-identification will be accomplished by removing all 18 identifiers enumerated at 45 CFR § 164.514(b)(2).
2. The Application requests no claims-line or individual member-level detail. These types of information are available in this type of request if aggregated or rolled up to a high level.
3. The Application requests no sensitive claims information as determined by the Data Release Review Committee and the APCD Administrator.

4. The APCD data requested under the Application will not be linked to or combined with data or information obtained from other sources.
5. The Applicant agrees to cell-size suppression requirements (following CMS recommendations of fewer than 11 elements and application of complementary cell suppression techniques).
6. Applicant agrees to return or provide proof of destruction of the data upon completion of the project as described in the Application.
7. These criteria are subject to change as determined necessary by the Data Release Review Committee (DRRC).