Standard Operating Procedure	Title: CO APCD Public Data Release (Spot Analysis, Annual Reports, Public Website, etc.)	Print Date: 7/19/2016
Revision # 1.1	Prepared By: Cari Frank	Date Prepared: 7/19/2016 Last Modified: 2/15/2019
Effective Date: July 2016	Reviewed By: Jonathan Mathieu Tracey Campbell	Initial Date Reviewed: 7/28/2016
Standard: CO HB 10-1330 & associated rules 10 CCR 2505-5-1.200.5	Approved By: Ana English	Date Approved: 2/28/2017

Policy:

As the Administrator of the Colorado All Payer Claims Database (CO APCD) and with direction from the CO APCD Advisory Committee, CIVHC makes aggregated, HIPAA/HITECH/FTC/DOJ-compliant reports and analyses available to the public to inform Colorado of opportunities to improve care and quality and lower costs. This policy is applicable, but not limited to, the following types of data analytics and reports CIVHC releases for free on our public websites through either civhc.org and/or comedprice.org.

- Public interactive reports and data showing variation in price and quality by facility and population level cost, utilization, chronic disease and quality via comedprice.org
- Spot Analyses, white papers, issue briefs and infographics highlighting very specific measures and opportunities for change
- Data Bytes (static chart or graphic containing minimal aggregated data elements without accompanying text)
- Annual legislative report

Purpose:

Key Underlying Assumptions for ALL Public Releases:

The CO APCD Advisory Committee directs all of CIVHC's public reporting by providing input on spot analysis topics, data bytes, and new measures to be released on the public website. In

addition, the CO APCD Advisory Committee reviews and approves the CO APCD Legislative Report due annually to the General Assembly and Governor on March 1st of each year.

All data and analyses produced by CIVHC is intended to be presented in a non-biased, non-partisan manner to inform Colorado of opportunities to achieve the Triple Aim of better health, better care and lower costs. CIVHC does not represent any particular health care stakeholder and makes every attempt to ensure that all analysis are presented in a factual, unbiased manner. CIVHC's intention for the release of CO APCD information at the advisement of the multi-stakeholder CO APCD Advisory Committee is to make meaningful, actionable data and analyses public that can then be interpreted and used by all stakeholders and advance the Triple Aim. We take all reasonable steps to ensure multiple stakeholder views are represented across the health care continuum including, but not limited to patients, payers, employers, providers and policy makers.

Scope: These CIVHC departments participate in this process:

- **Business Development Team** – Facilitates the CO APCD Advisory Committee meetings for input on public release topics and website measures.

- **Data & Delivery and Innovations Team** – Conducts feasibility, project management of data, conducts analysis and/or QAs data as appropriate

- **Community Connector/Internal (CIVHC) Subject Matter Expert (SMEs)** – Varies depending on topic.

- **Communications Team** –

    o Grant Writer & Report Specialist (content development and project lead for spot analyses, website content)

    o Director of Communications & Marketing (content editor, PR, promotion, stakeholder outreach, post-release monitoring)

    o Marketing Manager (design/formatting/branding, email blast, website posting, social media)

- **Project Manager and Outreach Consultant for public website release**

Definitions:

HIPAA: means The Health Insurance Portability and Accountability Act of 1996 and the regulations and rules promulgated thereunder, including regulations found at 45 CFR Parts 160, 162, and 164 ("HIPAA Rules"), the regulations specific to privacy found in 45 CFR Part 164, Subpart E ("HIPAA Privacy Rules"), and the regulations specific to security found in 45 CFR 164, Subpart C ("HIPAA Security Rules").

Procedure:

1.0   PUBLIC WEBSITE UPDATES

1.1   Determine Data and Report Elements and Partners

- Work with the CO APCD Advisory Committee to determine new measures for the website
- Meet as an internal team to further define feasibility and data elements available and appropriate to provide on the public website; work with data vendors to discuss feasibility of public reporting
- Propose final measures/data elements to Committee.
- Finalize measures and develop a timeline for roll out.

1.2   Engage Partners, Begin Data Analysis

- For price and quality information on a named provider basis, CIVHC conducts pre-meetings with facilities to test methodology and processing and, when appropriate, notifies facilities that will be identified in the public reports via memo and other outreach mechanisms that updates are planned.
- For population metrics (cost, utilization, chronic disease, etc.), CIVHC keeps a running list of potential metrics of interest based on feedback we receive from stakeholders, reports other APCDs are producing and topics of interest identified in the media and research studies conducted nationally and locally.

1.3   Develop and QA Data Output & Review Output with Stakeholders

- CIVHC analysts QA methodology and analytic outputs and draft reports for review by internal and external stakeholders (if applicable).
- For price and quality information on a named provider basis, CIVHC conducts a preview period with all facilities/providers to be named via a secure online portal.
  - o The preview period is a minimum of 30 days prior to publication during which time facilities/providers have opportunity to review, validate and ask questions regarding their results.
  - o Facilities/providers have the option to "hide" their information from public reports if data discrepancies that cannot be resolved are identified. In this case, public reporting would note that the facility requested that their data not be reported at this time. In all such cases, CIVHC works with the facility /provider to resolve all discrepancies identified.

1.4   Edit and finalize based on feedback

- CIVHC provides website preview to CO APCD Advisory Committee and core set of stakeholders **(see item 5.0 for list of orgs)** a minimum of two weeks prior to release.
- CIVHC team reviews input from stakeholders and determines appropriate inclusions.
- Input from stakeholders will be incorporated in the public data and reports as appropriate.
- Feedback loops will be closed with reviewers/stakeholders to share reasoning why elements of their feedback may not have been incorporated (if applicable).
- Website updates finalized.

1.5   Release Publicly/Promote

- One to two weeks prior to release, share with all key stakeholders
- Public release and promotion includes but is not limited to:
    o Press release, social media, email blasts, blogs, newsletter articles, partner promotion, links in all CIVHC/APCD websites for cross-promotion.

2.0   SPOT ANALYSIS, WHITE PAPERS, INFOGRAPHICS, ETC. (INVOLVING MORE THAN 8 HOURS OF ANALYST TIME; INCLUDES MULTIPLE DATA ELEMENTS AND WRITTEN CONTENT IN ADDITION TO DATA)

2.1   Determine Data Elements and Partners

- Work with the CO APCD Advisory Committee to determine measures and new measures for the website
- Meet as an internal team to further define feasibility and data elements available and appropriate to answer the questions and topics brought forth by the Committee
- Analyst determines feasibility/validity of proposed new measures based on data included in the APCD and impact of any data discovery issues currently impacting the data.
- Propose final measures/data elements to Committee
- Depending on the topic for spot analysis, CIVHC reaches out to various stakeholders, measures other APCDs are using successfully, commonly used or requested services, etc. to further refine and finalize measures.

2.2   Engage Partners, Begin Data Analysis

- Internal CIVHC meeting and the Advisory Committee will identify potential data elements and potential partners and key stakeholders for each topic identified at least two months prior to the anticipated release.
    o Agenda for Planning Meeting:
        ▪ Discuss overall direction for analysis
        ▪ What question/problem are we trying to solve and/or health care related opportunity are we exploring?
        ▪ What data elements are most appropriate given our current data set and known data discovery items?
        ▪ Who are the key influencers or people in the community who might use/be affected by this data?
        ▪ Determine partners we should be working with for this topic (e.g.: who might actually use this in the field, legislators, organizations, etc?)
- Partners and stakeholders will determine their level of support in the piece (co-author, reviewer, etc.) and will be engaged in the development of the piece and data elements as appropriate.
    o If key partners/stakeholders were identified, a lead contact will set up a call(s) with the following agenda:
        ▪ Ask if they would like to partner on the publication.
        ▪ If no:

- Let them know when the publication will be released and ask if they would like to receive embargoed copy and/or provide feedback ahead of release.
  - If yes:
    - Discuss direction and get feedback on value of the analysis
    - Discuss potential data elements and methodology options
    - Discuss timeline

2.3   Develop/QA Data Output & Share with Stakeholders

- CIVHC analysts develop reports and QA output for review by internal and external stakeholders (if applicable).
- CIVHC shares draft written document and data with CO APCD Advisory Committee and partner stakeholders (if applicable). CIVHC will clarify that not all input from external stakeholders can be included, and explanations for any non-included input will be shared.

2.4   Edit and finalize based on feedback

- CIVHC team reviews input from Advisory Committee and stakeholders and determines appropriate inclusions/modifications given the purpose and audience.
- Input from stakeholders incorporated in the report where appropriate.
- **Feedback loop will be closed with reviewers/stakeholders to share reasoning why elements of their feedback may not have been incorporated (if applicable).**
- Piece finalized.

2.5   Release Publicly / Promote

- **One to two weeks prior, share final draft with APCD Advisory Committee and all key stakeholders (see item 4.0 for list of orgs).**
- Send final analysis and embargoed draft press release to all partners and board members one day prior to release.
- Public release and promotion includes but is not limited to:
  - Press release, social media, email blasts, blogs, newsletter articles, partner promotion, links in all websites for cross-promotion.

3.0   DATA BYTES (LESS THAN 8 HOURS OF ANALYST TIME, NO EXTENSIVE WRITTEN CONTENT INCLUDED, i.e. GRAPHIC ONLY)

3.1   Data is requested

- Source could be internal from CIVHC staff, or external (legislator, media representative, etc.) that can support
- Request involves a small set of data elements (1-5) that could be fulfilled and QA'd by an analyst within 8 hours of time.

3.2   Internal feasibility conducted

- Internal team (VP of Compliance, Project manager, and Sr. Mgr. Public Reporting and Data Quality) review request and purpose to determine:
    - If request meets Triple Aim requirement and all HIPAA/HITECH privacy standards
    - Data is available through the CO APCD to support the need
    - Request can be fulfilled within the timeframe requested

3.3   If feasibility criteria is met (above), CIVHC staff will send the CO APCD Advisory Committee an email outlining the requestor, request and purpose

3.4   CO APCD Advisory Committee is given 3 business days to respond to the request with any concerns.

3.5   If significant concerns are raised and cannot be addressed, CIVHC will not move forward with the request.

3.6   If no concerns are raised, CIVHC will move forward with conducting the analysis and posting the information publicly on the web and promoting through social media.

4.0   ANNUAL CO APCD LEGISLATIVE REPORT

4.1   Determine Data Elements, Inclusion and Theme

- CIVHC team meets to review requirements (for annual legislative report) and determine data elements that need to be included and overall themes for report.
- Timeline developed to ensure time for review by APCD Advisory Committee and the CIVHC Board of Directors.

4.2   Begin Data Analysis and Draft Content

- Data analysis begins for elements or reports not currently available on website; communications team gathers data that is already available.

4.3   QA Data Output & Review Output with Stakeholders

- CIVHC analysts develop data and analyses for annual report and QA output for review by internal team.
- CIVHC shares draft document and data with APCD Advisory Committee and the CIVHC Board of Directors. CIVHC will be clear that not all input from external stakeholders can always be included, and explanations for any non-included input will be shared.

4.4   Edit and finalize based on feedback

- CIVHC team reviews input from stakeholders and determines what makes sense to include/modify given the purpose and audience.
- Input from stakeholders incorporated in the report where appropriate.
- **Feedback loop will be closed with reviewers/stakeholders to share reasoning why elements of their feedback may not have been incorporated (if applicable).**
- Annual Legislative Report finalized.

4.5   Release Publicly/Promote

- **One to two weeks prior, share with all key stakeholders (see item 5.0 for list of orgs).**
- Public release and promotion includes but is not limited to:
    - Press release, social media, email blasts, blogs, newsletter articles, partner promotion, links in all websites for cross-promotion.

5.0 KEY STAKEHOLDERS

One to Two Weeks Prior to Release: Notify Potentially Impacted Stakeholders. At this point, ideally both the press release and analysis (may still be in draft form) will be provided to potentially impacted stakeholders allowing time for them to ask CIVHC questions on methodology and explaining timeline for release.

- Department of Health Care Policy and Financing (HCPF)
- Division of Insurance
- Colorado Department of Public Health and Environment
- Colorado Hospital Association
- Colorado Medical Society
- Colorado Association of Health Plans
- Colorado Ambulatory Surgery Center Association
- CIVHC Board of Directors

References:

STANDARDS

A. **CO HB 10-1330 & associated rules 10 CCR 2505-5-1.200.5**
Colorado House Bill establishing the APCD
HCPF-promulgated Rules for the APCD, Section 1.200.5 covering Requests for Data and Reports

Timeline for Spot Analysis and Annual Reports:

Weeks Prior to Release	Activity	Person(s) Responsible
12 weeks	When appropriate and already identified, proactively reach out to potential partners/stakeholders to schedule meeting to take place post-CIVHC internal planning meeting. This will allow us to get on partner/stakeholder calendars and provide a heads up that the piece is in the works, share our approach and get feedback.	Grant Writer & Report Specialist to email potential partner and cc Subject Matter Expert for FYI and request Program Assistant schedule meeting

12 weeks	Internal CIVHC meeting with identified team for particular topic area:
	Agenda for Planning Meeting:
	   o **Discuss overall direction for analysis**
	   o **What question/problem are we trying to solve and/or health care related opportunity are we exploring?**
	   o **What data elements are most appropriate given our current data set and known data discovery items?**
	   o **Who are the key influencers or people in the community who might use/be affected by this data?**
	      ▪ Determine partners we should be working with for this topic (aka, who might actually use this in the field, legislators, organizations, etc.?)
	   o **Does data/analysis already exist, and can communications access the data without additional analyst time?**
	      ▪ **Yes** – no analyst needed to pull data, communications staff will gather data from website, Tableau, current report, etc. depending on where data lives
	      ▪ **No** – determine timeline for analyst to get data to communications in desired format.
	         • Submit formal request for data pull and analysis. (determine if communications or analyst should submit this)
	   o **Timeline Review, Assign Personnel, schedule calendar invites**
		All identified team members, Grant Writer & Report Specialist to coordinate scheduling and lead agenda

Immediately following planning meeting (10 weeks minimum):	**If key partners/stakeholders were identified**, lead contact to set-up a call(s) with the following agenda:
	• Ask if they would like to partner on the publication.
	• **If no**:
	Let them know when the publication will be released and ask if they would like to receive embargoed copy and/or provide feedback ahead of release.
	• **If yes:**
	    ○ Discuss direction and get feedback on value of the analysis
	    ○ Discuss potential data elements and methodology options
	    ○ Discuss timeline
		SME or other appropriate contact plus Grant Writer & Report Specialist

10 weeks	• 30 minute touch base with team post-stakeholder input, fine tune data to pull and desired outputs/metrics • Submit official data request	Grant Writer & Report Specialist to schedule with Program Assistant;
8 weeks (or more, depending on analyst availability)	Analyst pulls data, performs analysis and provides results to the team. Existing data/reports collected by communications team.	Analyst or communications team
7 weeks	Reconvene team based on the results of the data pull, identify necessary revisions to the data request made at this time	Grant Writer & Report Specialist to schedule with Program Assistant; full team involved in meeting
6 weeks	Conduct validation/smell check on new data and analysis (if necessary), data and results fully QA'd by an analyst	Analyst and QA analyst
6 weeks	Draft content developed and sent to Director of Communications & Marketing for review	Grant Writer & Report Specialist
5 weeks	Draft reviewed/edits incorporated; released to full team for review	Director of Communications & Marketing; Grant Writer & Report Specialist
4 weeks	Revised draft to full team for edits/comments and meeting to touch base with team, incorporate edits	Grant Writer & Report Specialist
4 weeks	Provide revised draft to stakeholder partners for feedback	Grant Writer & Report Specialist
3 weeks	Begin formatting/developing graphics	Marketing Manager
3 weeks	Send draft to PR firm to develop press release/edit press release/send to partners and those quoted for review and approval	Director of Communications & Marketing

3 weeks	Incorporate any stakeholder feedback into piece as appropriate and provide feedback loop on decisions regarding inclusion of feedback, review for final edits	Grant Writer & Report Specialist
2 weeks	Develop email blast and stakeholder email asking for help with promotion (including sample social media posts)	Marketing Manager
1 week	Send final analysis and embargoed draft press release to all partners, standard stakeholders (board, CMS, CHA, etc.) (*see more details on next page regarding stakeholder outreach)	Grant Writer & Report Specialist; Director of Communications & Marketing
5 days	Develop social media posts and email to stakeholders to share piece and include potential social media posts	Director of Communications & Marketing
3 days	Share with media, board and any other stakeholders who may help support promotion; notify interviewees from CIVHC and partner organizations that they may be asked to provide additional comments to the media	Director of Communications & Marketing
1-2 days	Finalize email blast, post press release to website, post all materials (press release, infographic/report, etc.) to website and set up release for following day; final communications review of release and third party review (non-involved CIVHC staff) of press release and email blast; social media post development	Grant Writer & Report Specialist; Marketing Manager; Director of Communications & Marketing
Day of Release	• Email blast released 8am • PR newswire release if applicable (Evolution) • Social media posts	Grant Writer & Report Specialist; Marketing Manager; Director of Communications & Marketing
Post-release	• Continue to promote through social media • Promote in next newsletter as article and with blog • Promote any external reference of the article or media mentions • Develop an impact summary for the next board meeting	

Revision History:

Revision	Date	Description of changes	Requested By
1.0	7/19/16	Initial Release	
1.1	2.28.17	Addition of Data Byte Request	