



CENTER FOR IMPROVING
VALUE IN HEALTH CARE

Self-insured Proposed Rule Change Webinar

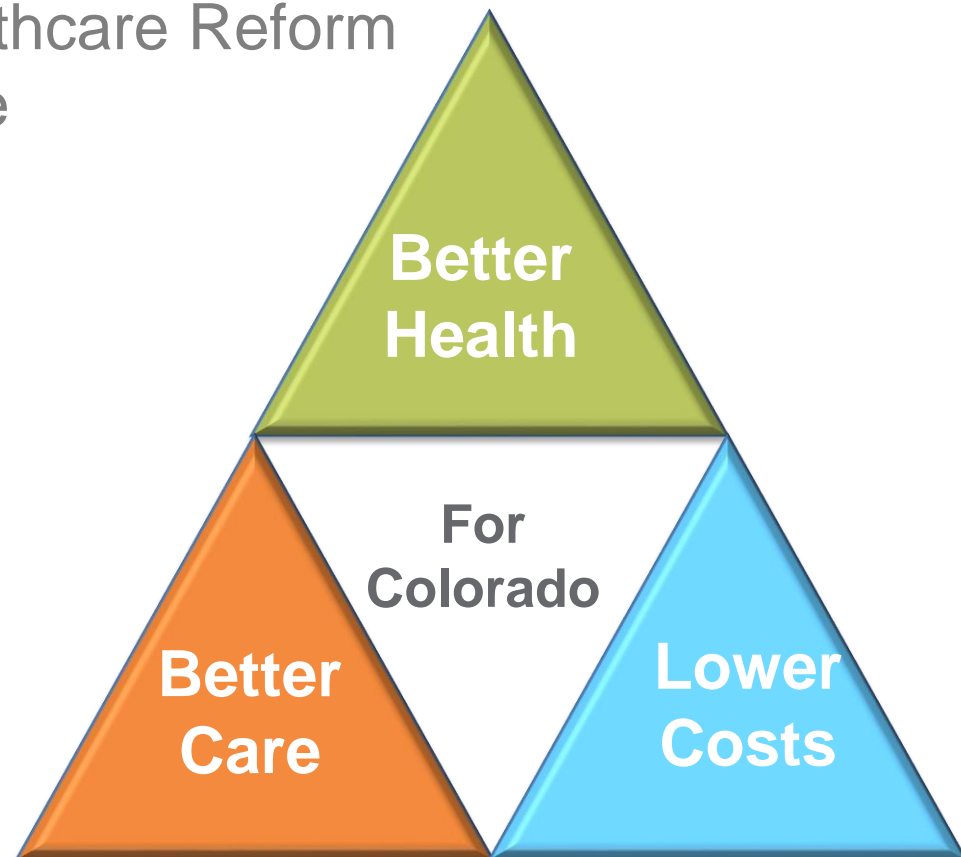
June 12th, 2015

Tracey Campbell, VP of Strategy & Business Development

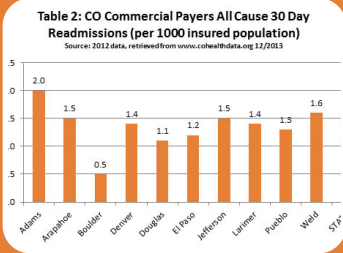
Higher Quality. Lower Cost. A Healthier Colorado.

Who We Are

- Non-profit, non-partisan organization
- Founded out of recommendation from Blue Ribbon Commission on Healthcare Reform and Governor's office
- Triple Aim Mission:



How We Do It



DATA

- We administer the Colorado All Payer Claims Database, the Database, the state's most **comprehensive source** of health care cost, quality and utilization claims data.



IDENTIFY OPPORTUNITIES

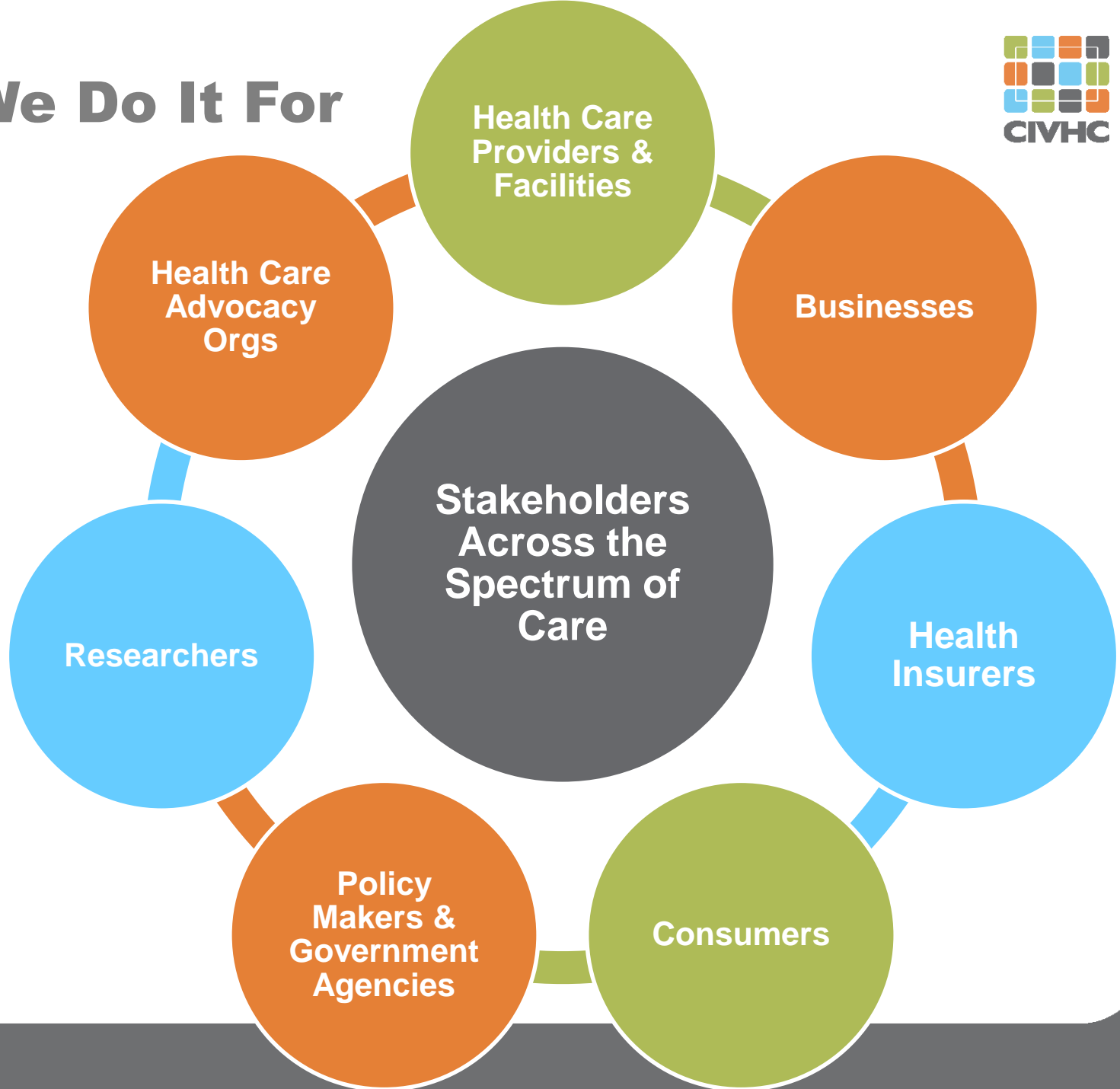
- We unlock information and insights that guide how health care gets delivered, used and paid for.



CONNECTING

- We bring together organizations and individuals who share our cause, to design and drive collective change.

Who We Do It For



What Makes Us and Our Work Different

- Our only interest is in uncovering and advancing efforts that move the needle on health care value.

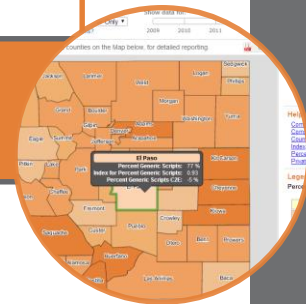
- We are spearheading the development and use of innovative data tools never before available in our state.

- The CO All Payer Claims Database provides the most complete picture of health care cost, quality and utilization claims data in the state.

Pioneering

Comprehensive

Objective



Why the need to change the APCD rule?



- **To meet the original legislative intent of the APCD Statute**
 - Contains references to employers and private purchasers of health care.
(...’Result in usable and comparable information that allows public and private health care purchasers, consumers,’)
 - Includes an important, and growing, insured market segment into the APCD which the Blue Ribbon Commission envisioned 6 years ago.
 - Fulfills goal of having a comprehensive database that allows for continuous, transparent monitoring, analysis and reporting about health care utilization, expenditures, quality of care and patient safety for all Coloradans

Proposed Rule Changes

A Payer, for purposes of APCD data submissions, would be expanded to include:

- A self-insured employer-sponsored health plan covering an aggregate of 100 or more enrolled lives in Colorado
- It does not include a self-insured employer-sponsored health plan, if such health plan is administered by a third-party administrator or administrative services only organization (“TPA/ASO”) that services less than an aggregate of 1,000 enrolled lives in Colorado

Proposed Rule Changes



Employee Retirement Income Security Act (ERISA)

- A private health care payer subject to the provisions of the federal Employee Retirement Income Security Act (an “ERISA entity”) may opt out of the data submission otherwise required under this rule for data files related to claims data for calendar years 2015 and 2016 only.

Proposed Rule Changes

ERISA Employers Who Choose to Opt Out

- Such ERISA entity must declare that it has elected to “opt out” from (*i.e.*, decline) data submission for calendar year 2015, calendar year 2016 or both calendar years’ claims data no later than 120 calendar days after the effective date of this rule.

Proposed Rule Changes



Penalties

- The penalties shall not be levied against any private health care payer that is a self-insured employer-sponsored health plan for data submissions related to claims data for calendar years 2015 and 2016 only, unless such private health care payer is an ERISA entity and willfully neglects to submit an opt out form.

National View of Self-Funded Data Collection



APCD Data Sources by State (as of April 2014)	Commercial	Medicare	Medicaid	Self-Funded / Third Party Administrator (TPA)
Colorado	✓	Dec 2015	✓	Planned
Connecticut (a)	Planned	Planned	Planned	Voluntary
Kansas	✓	Planned	✓	Under review
Maine	✓	✓	✓	✓
Maryland	✓	✓	✓	✓
Massachusetts	✓	✓	✓	✓
Minnesota	✓	✓	✓	✓
New Hampshire	✓	✓	✓	✓
New York(a)	Planned	Planned	Planned	Planned
Oregon	✓	✓	✓	✓
Rhode Island	✓	✓	✓	✓
Tennessee	✓	Planned	✓	✓
Utah	✓	Planned	✓	★
Vermont	✓	✓	✓	
Virginia (b)	Planned	Planned	Planned	Planned

Timeline for rule Implementation



Activity	Dates
Rule packet to HCPF Coordinator	February 23, 2015
Outreach Communications to Health Plans, ASOs and TPAs	Emails: February 3, February 11, February 18, 2015 Webinar: February 25 th , 2015 Webinar: June 12 th , 2015
Individual email communication with submitters plans	Ongoing, communications with submitters daily
Public Review Meeting	March 23, 2015
Revised Rule to Coordinator	April 7, 2015
Hearing Date	June 29, 2015
APCD Rule Change Effective	August 30, 2015
Rule implementation of v7 DSG effective, Opt-out forms due (120 days after effective date)	December 28, 2015
New Submitter (ASO/TPA Self-insured) test files due (Three months of data)	February 8, 2016
New Submitter (ASO/TPA Self-insured) Historical file submissions due (January 1,2015- December 31,2015)	May 6, 2016
New Submitter (ASO/TPA Self-insured) Complete production files due (January 1,2015- current)	June 30, 2016 Regular submissions going forward

Rule Hearing Information

- Date: June 29th
- Time: 2:00-4:00pm
- Location: 303 East 17th Avenue, 7AB
- Public Comments must be received by June 22nd, 2015

Contact Information

- Tracey Campbell, VP of Strategy & Business Development
tcampbell@civhc.org

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