



Connecticut's Health Insurance Marketplace

April 24, 2014

Ellen Andrews, PhD
Executive Director
Connecticut Health Policy Project
Via email

Dear Ms. Andrews:

I received a letter from you on 2/26 and then another copy on 3/26, requesting Access Health Analytics (AHA) to reconsider an opt-out proposal in the APCD data collection policy. I put the subject matter of your letter on the agenda of the APCD Advisory Group meeting on 4/10/2014 as the appropriate venue for discussion. We discussed your concerns at that meeting and I shared my research on how an opt-out provision would affect the broad objectives of the APCD.

It appears we have a difference of opinion regarding this issue. In 2013, the Connecticut legislature, after considerable discussion and debate, rejected an amendment that would have allowed plan beneficiaries to opt-out. Access Health Analytics will honor the will of the legislature and follow existing enabling legislation, which rejected an opt-out proposal in adopting the bill.

In addition to the legislature's rejection of an opt-out proposal, there are other compelling reasons why an opt-out provision will be counter-productive for an APCD. Those reasons are why none of the operational APCDs allow for individuals to opt-out or opt-in (except for Rhode Island, which has an APCD currently under development). It appears that an opt-out process will be administratively burdensome. In fact Rhode Island is hiring a vendor solely to handle that process. Secondly, allowing an opt-out provision will undermine the integrity of the database for public health policy analysis.

AHA considers privacy to be of the greatest concern. We are taking steps to formulate policies and procedures that will ensure complete patient privacy and excellent data governance.

Sincerely,

A handwritten signature in black ink that reads "T. Ahmed". The signature is written in a cursive, slightly slanted style.

(Tamim Ahmed)
Executive Director
Access Health Analytics

cc: APCD Advisory Council
Kevin Counihan