



**Department
of Health**

Medicaid
Redesign Team

Data Sources Security & Privacy Requirements

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Agenda

- Introductions
- Data Sources, Access and Sharing
 - MAPP
 - RAM
 - Production
- Review of Topics and Further Discussion

Data Source, Access and Sharing

PHI from State Medicaid Sources	Type of Access	Program Requirement	Security Requirement for PPS Lead	Security Requirement for PPS Lead Sharing Downstream	Privacy Requirement
Demographic	MAPP – PHI Download	<ul style="list-style-type: none"> NYS DOH Sponsor Gatekeeper 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> BAA for each partner* 	PPS should ensure that any data sharing is limited to the minimum necessary for DSRIP project purposes in accordance with the <i>DOH Guidance Documentation: Privacy and Data Sharing within DSRIP.</i>
	Raw Data File – <u>to RAM</u>	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> DEAA DEAA Amendment RAM Request Form 	NOT ALLOWED	
	Raw Data File – to production	<ul style="list-style-type: none"> Required for downstream data sharing 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> Security Attestation document - NEW BAA for each partner BAA for each partner 	
	SIM – PHI Download – <i>under development</i>	<i>TBD</i>	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> BAA for each partner 	
	MDW	<ul style="list-style-type: none"> NYS DOH Sponsor Gatekeeper 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> BAA for each partner 	
Member Roster	MAPP – PHI Download	<ul style="list-style-type: none"> NYS DOH Sponsor Gatekeeper 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> BAA for each partner 	
	Raw Data File – <u>to RAM</u>	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> DEAA DEAA Amendment RAM Request Form 	NOT ALLOWED	
	Raw Data File – to production	<ul style="list-style-type: none"> Required for downstream data sharing 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> Security Attestation document - NEW BAA for each partner 	
	SIM – Non PHI Download	<ul style="list-style-type: none"> NYS DOH Sponsor Gatekeeper 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> N/A 	
	SIM – PHI Download – <i>under development</i>	<i>TBD</i>	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> BAA for each partner 	
	MDW	<ul style="list-style-type: none"> NYS DOH Sponsor Gatekeeper 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> BAA for each partner 	
Claims and Encounter Data	Raw Data File – <u>to RAM</u>	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> DEAA DEAA Amendment RAM Request Form 	NOT ALLOWED	
	Raw Data File – to production	<ul style="list-style-type: none"> Required for downstream data sharing 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> Security Attestation document - NEW BAA for each partner 	
	MDW	<ul style="list-style-type: none"> NYS DOH Sponsor Gatekeeper 	<ul style="list-style-type: none"> DEAA DEAA Amendment 	<ul style="list-style-type: none"> BAA for each partner 	

*All BAA must be DOH compliant and filed with DOH

Data Source, Access and Sharing Details

- **MAPP Dashboard – Does not require SSP or RAM for access**
 - Provides PPS and PPS hub aggregate performance profiles and PHI for specific providers
 - SNAPSHOTS provide most “real-time” and actionable data to impact performance – submitted claims data at PHI level refreshed monthly
- **MAPP 2.0 (a PPS specific version of the MDW Power User)**
 - Provides access to secure environment to query MCD data
 - PPS will be able to bring other data sets to analyze in the MDW
 - PPS could grant permission to their downstream partners
- **Restricted Access Model (RAM)**
 - Conduct population health analytics using different data sources in RAM server environment. All data can be fed to RAM server environment. **No data can be exported from RAM server environment.**
 - RAM is not required
 - RAM is not intended to be a long term solution
 - RAM that are not retired or that do not become part of production, may be subject to a security audit
- **Production Environment (long term data sharing with partners)**
 - Provides PPS access to share with partners once DOH has approved security attestation.
 - PPS can go right to production - a **RAM is not required.**
- **Salient SIM Non PHI**
 - Provides ad-hoc access to claims based performance information. No security attestation is required.

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MAPP Dashboards- Access to Data

Access to MAPP

- Each PPS assigns a Gatekeeper as per the DEAA
- Gatekeeper requests users access to MAPP
- Roles for MAPP Dashboard users assigned by DOH include
 - Non PHI
 - PHI – View Only
 - PHI with Export Capability
 - DOH monitoring number of users and volume of data being exported

MAPP Dashboard Reports PHI Export

- Users must handle PHI export securely; MAPP encrypts exported data
- PPS and partners must protect all exported PHI under HIPAA and Privacy laws of NYS; PPS are encouraged to seek own legal advice
- PPS must have a BAA on file for each data sharing partner
- PPS can use their own BAA as long as Appendix A of the DEAA BAA language is included

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MAPP PHI Download Data Elements

Attribution:	Performance Measure
Medicaid CIN#	Medicaid CIN#
Member Name	Member Name
Attribution Category	Numerator
Attribution Length	
Sex	Sex
DOB	DOB
PPS	PPS
Managed Care Plan	Managed Care Plan
Health Home (HH)	Health Home (HH)
Care Management Agency	Care Management Agency
Downstream Shareable	Downstream Shareable
Current Medicaid Enrollment	Current Medicaid Enrollment
Eligible Date	Eligible Date
Shareable Date	Shareable Date
PSYCKES Indicator	PSYCKES Indicator

MAPP Access Account Requests

DOH provisions access to MAPP

- Only PPS staff are allowed accounts at this time
- PPS Gatekeeper requests specific users to be provisioned
- All requests must be sent to dsrip@health.ny.gov
- Ensure the user has an active HCS ID
 - Instructions on obtaining an HCS ID can be found on the DSRIP website the link is found below http://www.health.ny.gov/health_care/medicaid/redesign/docs/dsrip_paperless_hcs_account_request.pdf
- Please include the following user information in all requests:
 - HCS ID
 - Full name
 - Phone number
 - Email
 - Role (PHI View, Non-PHI or PHI Export)
 - Employee status (Who the user is employed by and the relationship to the organization that has the DEAA with DOH)

Restricted Access Model (RAM) Options

Model	Business Value	General Provisions	Documentation
RAM-1	PPS Leads and QEs may access, store, and process Medicaid Confidential Data (MCD)	<ul style="list-style-type: none"> Internally hosted Named users on DEAA Users and system in same building No internet Only employees may access No partner access No data sharing or export 	<ul style="list-style-type: none"> DEAA/ DEAA Addendum QE – DEAA Attachment C
RAM-2	PPS Leads and QEs may access, store, and process Medicaid Confidential Data (MCD)	<ul style="list-style-type: none"> Internal, third-party, or cloud service provider Limited number of users Internet connected Employees and contracted staff No partner access No data sharing or export 	<ul style="list-style-type: none"> QE—DEAA Attachment C PPS—demonstrated compliance with RAM requirements

DOH Estimated Attestation Approval Timeline

- PPS submits completed attestation with corresponding policies and procedures
 - Policies and procedures should be implemented at the PPS and vendor partner (as applicable)
 - PPS attests current state for all controls
- DOH reviews attestation and policies and procedures – 2 weeks
- DOH provides feedback to the PPS
 - DOH can schedule follow up call with PPS as needed
- PPS resubmits additional materials to DOH
- DOH reviews additional materials – 1 week
- DOH sends approval – 2 days
- PPS provides results from Third Party Assessment – within 6 months of approval

Production Requirements

- RAM-1 or RAM-2 environments **may be used** in production plan if included in approved security attestation
- RAM servers not included in production must be decommissioned and all data destroyed (data destruction affidavit required)
 - DOH is offering many options to obtain and analyze data to achieve their PPS goals. PPS should be formulating a transition for their RAM.
- DOH will notify PPS in writing when production model approved

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Production Requirements

- **NEW** - PPS complete and sign **system security plan control attestation form in lieu of workbooks**
 - Aligned with DOH Moderate-Plus SSP v2.1 Workbooks
 - PPS continue to work on workbooks to provide to Third Party
- PPS must still provide implemented policies and procedures for DOH review
- PPS must have critical controls in place initially while working towards full compliance
- PPS must obtain a Third Party to validate implemented controls. Final report must be submitted to DOH within six (6) months of production approval

Elements for Data Matching

- Limited to those members who have shareable indicator of “Y”
- Expansion from two data elements to four for **matching purposes only**
- **Sharing comingled data still is limited to the Name & CIN** from the claims files or MAPP Export **until approved for production:**
 - Name
 - CIN
 - Date of Birth
 - Address

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Questions

- Data Access: Contact the Division of Operations and Systems Security and Privacy Bureau

doh.sm.Medicaid.data.Exchange@health.ny.gov

- DSRIP Program and goals: Contact DSRIP

DSRIP@health.ny.gov