

## APAC and REALD & SOGI Implementation Project Summary

### Introduction

The All Payer All Claims (APAC) program has collected race, ethnicity, and primary language since 2011. APAC is a secondary data set; it collects existing administrative data. Although APAC falls under the 2013 law that OHA programs collecting demographic data must follow REALD standards, its statute (ORS 442.373) limited it to national standards before 2023. Commercial insurers, third-party administrators, and pharmacy benefits managers have poorly reported data because race, ethnicity, and language are not necessary for contracts. Medicare Advantage and Medicaid (OHP) have more complete data but are still limited to national standards (five race groups, Hispanic yes or no).

Passed during the 2023 legislative session, SB 966 allows APAC data to discern equity in health services received through collection of REALD and SOGI data. In addition, working with the Equity and Inclusion Repository, APAC will potentially fill gaps in data reported to the Repository by healthcare providers for insured individuals who have not obtained medical care. Changes under SB 966 include:

- APAC is authorized to collect data that meets ORS 413.161, commonly called REALD & SOGI. Before submission, APAC must update the APAC data file layouts through formal rulemaking.
- Provider training on culturally competent data collection expanded to include disability, sexual orientation, and gender identity. APAC needs more resources to determine appropriate training and has yet to use this provision previously.
- Unrelated changes to data files for research, charging for data files, and trade secret protections for voluntary submitters.

### Project Objectives

- Inform existing data submitters on the requirements for submitting REALD & SOGI information.
- Onboard incoming data submitters on the REALD & SOGI data submission process.
- Integrate the Equity and Inclusion Division's REALD & SOGI repository data into the APAC data enclave for internal and external data requestors and internal OHA staff.

### APAC Scope of Work

- Hold planning meetings with the Equity and Inclusion Division to understand data and project needs. Both the Equity and Inclusion Division and APAC have direct authority to collect data from insurers, so collaboration is essential for all parties.
- Confirm the data layout to match repository file requirements.

- Hold workgroup meetings with insurers and data submitters to gather feedback on data formatting and layouts.
- Adopt the new data file layout through formal rulemaking; the proposed dates are to collect from all data submitters starting January 31, 2025, for 2024 data.
- Amend the existing contract with HSRI for additional data collection and processing, including onboarding new data submitters and using APAC to submit REALD & SOGI data.

### Project Timeline

- APAC and Equity and Inclusion Division Planning meetings 11/2/23-1/5/23
- HSRI Contract Amendment- 4/1/2024-7/1/24
- APAC Rules Planning and Changes- 1/17/24-6/8/24
- Workgroup meetings with insurers and data submitters- 4/1/24-5/31/24
- Early Adopters and Test Passthroughs- 5/1/24-11/29/24
- Onboarding of Data Submitters- 9/6/24-11/01/24
- **Required REALD and SOGI data submission for submitters 1/31/25**

### Key Stakeholders and Project Team

Grace Paiva (Project Lead)

Karen Hampton (APAC SME)

Piper Block (RAD Manager)

Marjorie McGee (REALD & SOGI Director)

Kweku Wilson (REALD & SOGI program manager)

Renee Harger (REALD & SOGI SME)

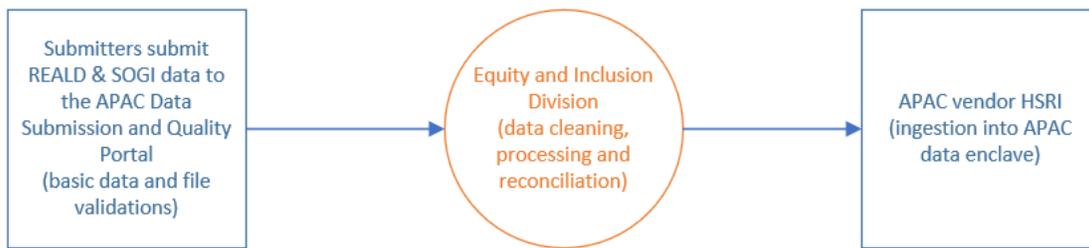
Jacob Tarrence (REALD & SOGI SME)

Jo Johnson (Data Equity Program Manager)

Andey Nunes (HPA Data Equity Research Analyst)

### Implementation Approach

The APAC and E&I teams have agreed to import REALD & SOGI data through the APAC Data Submission and Quality Portal, where the files will undergo basic validation checks. After receiving the files and completing basic validations, HSRI will pass the data to the E&I Division for additional data processing activities. Once the E&I team has processed the files, they will submit the data back to the APAC team for final use in the APAC data enclave. Please refer to the graphic below for better understanding.



### Budget and Resources

Budget and resource needs are currently pending discussions with the APAC and HSRI teams regarding a contract amendment and statement of work update. APAC reporters are not compensated for file submissions, which are required in ORS 442.373.

### Communication Plan

On January 17, 2024, the Equity and Inclusion Division presented the REALD and SOGI data to Technical Assistance Group attendees, including data submitters. There are plans to have a detailed and technical presentation on the REALD & SOGI data repository in the fall of 2024. In addition, APAC will keep TAG attendees, APAC data submitters, and data users informed of updates on the RAC process and the implementation of REALD and SOGI data through bi-monthly TAG meetings, GovDelivery emails, and the APAC website. The APAC team and the Equity and Inclusion division will continue to hold monthly internal meetings to monitor the implementation process's status.

### Success Criteria

The following criteria will be used to measure the success of the APAC and REALD & SOGI Implementation Project:

#### Timely Implementation:

- Achievement of milestones within the specified project timeline.
- Completion of APAC rules planning, HSRI contract amendment, and data submission processes as scheduled.

#### Data Accuracy and Completeness:

- Successful adoption of REALD & SOGI data collection within the APAC data enclave
- Validation of submitted data for file format through the APAC Data Submission and Quality Portal; the Repository will perform additional validations

#### Stakeholder Engagement:

- During onboarding, successful communication, and collaboration with key stakeholders, including mandatory reporters and their data submitters.

- Active participation and positive feedback from stakeholders in meetings and presentations.

#### Compliance with Regulatory Standards:

- Formal adoption of the new data file layout through formal rulemaking
- Compliance with SB966 requirements, ensuring culturally competent collection and reporting.

#### Resource Allocation and Budget Management:

- Successfully resolved pending discussions regarding the contract amendment and statement of work updates with APAC and HSRI.

#### Internal Collaboration:

- Seamless collaboration between the APAC and Equity and Inclusion Division teams.
- Effective data handover and cleanup activities between HSRI and the E&I Division.

#### Communication Effectiveness:

- Successful presentation to the Technical Assistance Group (TAG) on January 17, 2024.
- Regular and transparent communication through bi-monthly TAG meetings, GovDelivery emails, and APAC website updates.

### Conclusion

The implementation of REALD & SOGI data into APAC is a significant step towards enhancing knowledge of health services and health equity for Oregonians. The outlined success criteria, focusing on timely implementation, data accuracy, stakeholder engagement, regulatory compliance, resource management, internal collaboration, and effective communication, will serve as benchmarks for project evaluation.

Regular monitoring, open communication channels, and flexibility in adapting to unforeseen challenges will ensure that the APAC and REALD & SOGI Implementation Project achieves its objectives and contributes to the broader goal of promoting health equity within our community.

We look forward to a successful REALD & SOGI implementation and its positive impact on data equity and understanding of health disparities in our state.