

CDT Letter to OPM Regarding Health Claims Data Warehouse

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Supporting Documents

Dear Director Berry:

We are writing to express our concerns about the Health Claims Data Warehouse (the "Warehouse") announced by the Office of Personnel Management (OPM) in the Federal Register on Oct. 5, 2010.¹ We have two major concerns:

(1) OPM's system of records notice (SORN) announcing the Warehouse appears to be legally deficient. The SORN does not allow for a fair public evaluation of the Warehouse or the role of OPM and the Dept. of Health and Human Services (HHS) in operating the Warehouse. We understand that a new SORN is being drafted. We outline below specific concerns with the initial SORN and urge you to address them in the revision. At minimum, the revised SORN should provide much more detail on how the data will be protected and used, and it should provide another, genuine opportunity for public comment. OPM should not create this massive database full of detailed individual health records without giving the public a full and fair chance to evaluate the specifics of the program. The Warehouse is planned to launch on Nov. 15, 2010. Since a revised SORN has yet to be issued, this date clearly needs to be delayed.

(2) OPM's SORN issues aside, there are more fundamental problems with the proposed Warehouse. Although OPM's stated goals for the Warehouse of reducing health care costs and boosting efficiency are laudable, the planned database is unnecessary and raises significant health data privacy and security issues. In light of the substantive issues we discuss below, we urge OPM to halt efforts to establish this database. OPM should instead consider using a query system that keeps the data with the record holders - such as the health plans.

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