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March 23, 2023

RE: HCAI Data Policy

To Ms. Landsberg,

On behalf of the California Conference of Local Health Officers (CCLHO), I am writing to express our concern regarding the new Healthcare Access and Information (HCAI) policy requiring destruction of Emergency Department, Ambulatory Surgery, and Patient Discharge data files older than ten (10) years for Hospitals and Local Health Departments (LHD).

The concern is based on the need for LHDs to conduct analyses of long-term trend information to monitor outcomes on the health of the population and assess health care utilization throughout the system. Without longitudinal data, the scope of health outcomes or health care utilization trends will be severely limited.

While we appreciate the ability for LHDs to file for extension to maintain more than ten (10) years of data for the utilization of the 2021 data, there have been numerous LHDs that have gone through this process requesting the ten (10) plus years of data based on the need to access the health of their communities. Furthermore, when the extensions are granted, another strong concern is that the exemptions are limited and must be requested annually with attestation that the data will be purged when analysis is complete. Lastly and even more concerning, after 2023, Data Extension Requests will no longer be considered for approval.

CCLHO is requesting that HCAI review this policy in consultation with outside partners to adjust this policy for public health and allow public health agencies to store and use more than ten (10) years of data.

CCLHO was established in statute in 1947 to advise the California Department of Public Health, other departments, boards, commissions, and officials of federal, state, and local agencies, the Legislature, and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 60 city and county jurisdictions.

Sincerely,

Anissa Davis, MD, MPH
President, California Conference of Local Health Officers