

How Health Plans Can Get a Head Start on the APCD Boom

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It's been coming for a while, albeit slowly. For more than a decade, experts and pioneering states have built the case for the state level All Payer Claims Database (APCD). Eighteen states have implemented APCD solutions, proving value, and providing lessons learned. And now, the 'surprise' catalyst that is expected to light the fire for those states not yet legislated for APCD, the *No Surprises Act*. Thanks to Section 115 of the No Surprises Act, states that were already prepping for an APCD launch will get a lift and those that weren't, are sure to stop and at least contemplate the new opportunity. A few states are already running to prepare grant applications as the 'light strings attached' approach to the federal funds provided by the No Surprises Act is causing state health departments and legislators to move fast. There have been plenty of informative articles summarizing Section 115 of the No Surprises Act so if you're unsure of the details, catch up with this [quick reference page created by The National Association of Health Data Organizations \(NAHDO\)](#), and then keep reading for some advice on how health plans can prepare for the APCD boom.

No Surprises Act grant appropriations are expected to begin in October 2021. That is soon! But before panicking, it is important to know that the APCD experts at the [APCD Council](#) advise that the [average timeline to launch an APCD after achieving legislative approval is six to twelve months](#). This suggests that while health plans have some time to get ready, this is definitely not a sit-back-and-wait timeline. Five states passed legislation before the No Surprises Act lift and it is expected that many more will be announcing plans soon. Health plans can take some preliminary steps to get prepared with three near-term actions that will create momentum in the right direction, right now.

First, appoint someone to monitor what is happening in the states in which the plan operates or expects to operate in the next three years. Policy and planning will be rapid, so get connected and watch closely. Most states have created special committees or resource teams to support APCD launch and maintenance, so some investigation is in order. If the plan is operating in a state with an existing APCD, it is still important to pay attention as the No Surprises Act funding enables existing APCD states to expand solutions.

Second, if the plan is already operating in states with mandatory APCD submissions, consider centralizing APCD services now. It is common for health plans operating in multiple states to have disparate systems, processes and teams managing APCD submissions as there are no two states with the same requirements. It is also common for health plans to assign

APCD requirements to the compliance function which often operates at a state or regional level. But there is commonality in the data requirements across states and therefore, efficiencies to be found. Centralization will pay-off in multiples as the number (of APCD states) grows. Inventory organizational assets and start moving toward centralization before implementing the next state. If not currently in an APCD state, the plan can get started on the right path by committing to a centralized APCD function from launch.

Finally, if the first or second recommendation caused even slight consternation, it is best to consider outsourcing the APCD function. APCD is a commodity, not a competitive advantage and in addition, it has a short time to market. There are organizations that have already invested in the systems, processes and knowledge teams to tackle the APCD boom offer, multi-state submission management via a consolidated platform, and can provide everything from SaaS to full-service BPaaS solutions. Plans will get the most benefit from an experienced partner by securing the relationship early. Outsourcing early can also provide the solution to meet both recommendations listed above.

The No Surprises Act has made APCD a headliner like never in the past. Expect rapid growth and start preparing now to ensure the plan is ready to meet state requirement without derailing resources and other strategic work. Get engaged, move toward centralization and consider outsourcing for early wins.

References: <https://www.apcdouncil.org/about-apcd-council> | <https://www.nahdo.org/NoSurprisesAct>

Have questions regarding your health plan's APCD roll-out strategy, [email Val Cerra](#) or call 570-430-0083.