

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Rick Scott
Governor

John H. Armstrong, MD, FACS
State Surgeon General & Secretary

Vision: To be the Healthiest State in the Nation

February 29, 2016

Molly McKinstry, Deputy Secretary
Division of Health Quality Assurance
Agency for Health Care Administration
2727 Mahan Drive
Tallahassee, FL 32308

Dear Deputy McKinstry:

The Department of Health (DOH) recently learned that the Agency for Health Care Administration (AHCA) is *exploring the possibility* of eliminating the social security number (SSN) and Infant Linkage data elements from the current inpatient hospital discharge, emergency department (ED) and ambulatory outpatient data sets. DOH's ability to study health trends would be severely compromised without the ability to continue with our current analytical and linking methodologies. We currently use a deterministic linking methodology that requires SSN/Infant linkage. This methodology was developed over a year in collaboration with the University of South Florida; a deterministic methodology was selected to emphasize accuracy and conservatism (minimizing false positives) in reporting. Changing to a methodology that does not use the SSN or Infant Linkage data elements would compromise the work done to date. Identifying and testing any new linking methodologies would take significant time and resources and would be very disruptive.

There would be a negative cascading effect across the Department of Health if the SSN/Infant Linkage data elements were to be eliminated from AHCA data. A significant amount of surveillance activities, projects and investigations would have to be discontinued or be completely reorganized to adapt to the loss. The data elements of SSN and Infant Linkage are used to unduplicate AHCA records since DOH analysis is usually at the individual level. No other data elements or combination of data elements in the AHCA records would be adequate for unduplication.

Thank you for your consideration of our comments and concerns while contemplating such a significant change (see attached document for answers to specific questions posed). Collecting SSNs can be burdensome in an age when people are understandably worried about privacy and identity theft. I am aware that the Florida Hospital Association has raised the idea of exploring other ways to create unique identifiers necessary for data linkage; DOH would be very interested in joining this conversation to seek a solution to the concerns. The various analyses that utilize confidential AHCA data and linked Vital Statistics-AHCA data ultimately benefits all Floridians as well as visitors to our state. If I can provide any further information, please let me know.

Sincerely,

Celeste Philip, MD, MPH
Deputy Secretary for Health
Deputy State Health Officer for CMS

Enclosure: DOH response to AHCA survey