

- Discussion Summary -

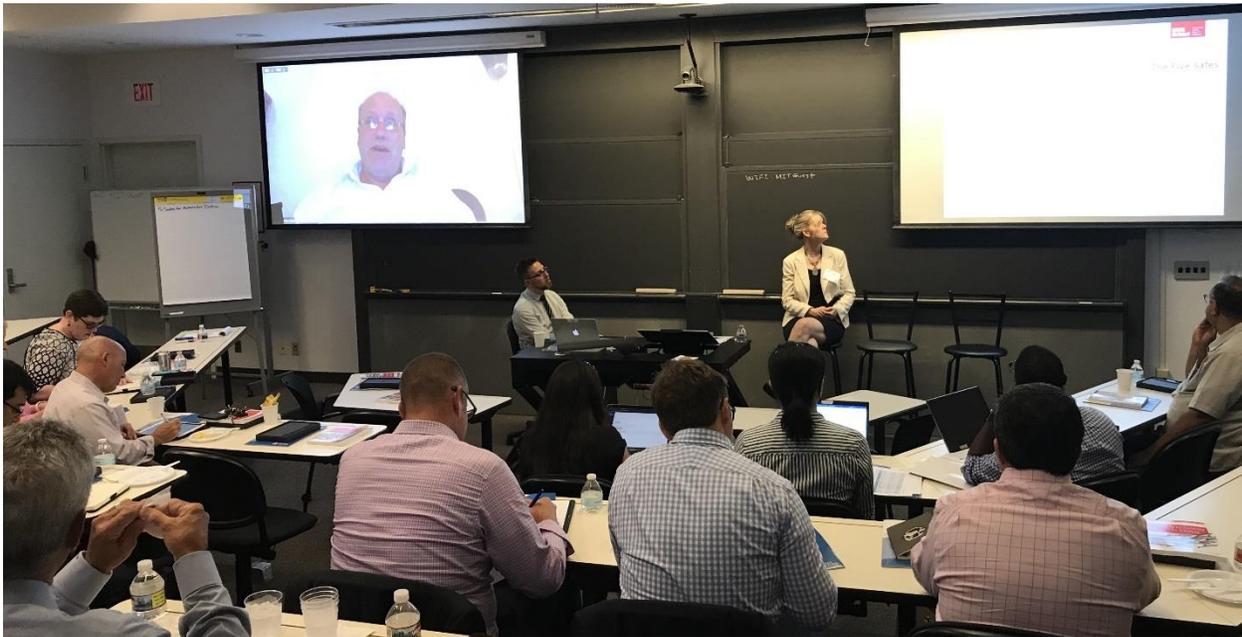
**Doing More with Data:
From Operational Efficiency to Competitive Advantage**
Tuesday July 30, MIT Tang Center, E51-145
MIT CDOIQ Symposium

Globally renowned data privacy expert Luk Arbuckle – co-author of *Anonymizing Health Data* (O’Reilly Media) – co-moderated this invite-only, half-day deep dive into the complex topic of **bridging the gap between using your data assets to create operational efficiencies and safely leveraging sensitive data to gain competitive advantage.**

Nearly 20 data, analytics and privacy leaders gathered to learn and weigh in with representation from industries spanning healthcare, banking, retail, and media.

C-level alignment, corporate culture (data literacy, risk aversion), and determining which data is worth keeping are some of the overarching themes that emerged from the day’s conversations.

A summary of the discussion follows.



Felix Ritchie, Professor at University of the West of England, presents the Five Safes Framework at MIT on July 30, 2019, during Privacy Analytics’ workshop Doing More with Data: From Efficiency to Competitive Advantage, as part of the CDOIQ Symposium.

Session 1: Sharing Your Efficiency Wins

Co-moderated by Privacy Analytics' Luk Arbuckle, Chief Methodologist, and Sarah Lyons, Sr. Director, Operations.

What does it mean to leverage data for efficiency?

Discussion themes centered on doing things “cheaper, better, faster” and on “changing the status quo”.

Responses generally broke down into three categories:

- **Business-centric efficiency**
 - Leverage customer efficiency wins for operational efficiency as a “force multiplier”
 - Automating legacy processes
- **Customer-centric efficiency**
 - Adding value for partners such as healthcare providers
 - Collecting and analyzing data to improve Net Promoter Scores (NPS)
- **Patient-centric efficiency**
 - Considering how to better serve patients via **prior authorization**. Physicians obtain prior authorization from payers to ensure payers compensate patients for medications or operations, avoiding a situation where patients are left to pay for unauthorized costs of care. However, according to [this article](#), “The idea is to ensure that health care is cost-effective, safe, necessary, and appropriate for each patient...But prior authorization requirements are also controversial, as they can often lead to treatment delays and can be an obstacle between patients and the care they need.”
 - Gaining data insight to personalize treatment programs (i.e. avoid the “70/30” problem where the same treatment is applied broadly to patient populations and the minority doesn’t benefit)

What roadblocks did you overcome to get to this point?

- Attendees agreed **corporate culture** is the number one roadblock they’ve had to overcome to achieve efficiency wins.

- **Data literacy** and **risk aversion** stood out as two key impediments to progress.
- In terms of data literacy, it's not enough to be "data driven". Data becomes actionable when employees gain the capability required to extract, and communicate, meaningful insights from data.
- Data initiatives that disrupt standard practices and how things have always been done can be perceived as risky.
- There was also discussion of **data as power**, and potential push back from teams who fear loss of control over data may decrease their perceived or actual value to the organization.
- Another cultural roadblock is standardizing a global data format, which impacts the ability to trace the lineage of data.

Of the things you did to overcome that roadblock (i.e. corporate culture), which one had the biggest impact?

- **Align with C-level priorities** / purpose of the business and solve foundational issues that can scale.
- Demonstrate success through business outcomes (e.g. commercial impact, customer success).
- Apply **agile operating models** to achieve early quick wins and solve problems in iterations (pilots/POCs).
- Be intentional across the organization to hire people with a data mindset (ties back to data literacy).
- Avoid distractions for the data office and stay focused on well-defined "wins" that build momentum organizationally with tangible results.

Session 2: Sharing Your Efficiency Wins

Co-Moderated by Dianne Bourque, Partner at Mintz Levin and Felix Ritchie, Creator of the Five Safes Framework (and Professor at University of the West of England).

Downloads:

- Felix's slide content [here](#).
- Luk's slide content [here](#) including the **Trust in Motion** template to help you put the Fives Safes into action.
- [The Five Safes of Risk-Based Anonymization](#) [whitepaper] provides a framework to help you confidently drive data value safely.
- Felix Richie suggested starting with the **managerial controls** (i.e. Safe Projects, Safe People, Safe Settings) when thinking about how to action the Five Safes.
- Luk Arbuckle recommended attendees consider **vision, alignment** and **execution** when thinking strategically about the Five Safes.
- When thinking about the Five Safes, Felix Richie suggested posing the question “**What do I need?**” (to take action).

Safe Projects:

- A representative from GE Healthcare suggested the group consider a [business model canvas](#) when thinking about Safe Projects, and generally.

Safe People

- Felix recommended attendees ask, “What’s the **attitude** of the people with whom I’m sharing data? Do I trust them?”
- Other considerations that came up:
 - Finding out why a partner is interested in sharing data with your organization can help create alignment.
 - Asking if partners have a documented data privacy program.
 - Conducting a user access review and providing “least privilege access”.
 - Putting in place the right contracting framework and data-sharing agreement.

Safe Settings

- Consider the context in which data is being de-identified; you can't use data however you please just because it is de-identified.

Safe Data

- The concept of a minimal dataset resonated with attendees; however, the challenges of deciding what data to keep or discard always requires careful consideration based on business needs.
- Other considerations included providing time-bound access to data and the role of Expert Determination in HIPAA before publishing data.

Safe Outputs

- Attendees discussed the goal of achieving the **highest utility data** at the **lowest possible risk** (recognizing zero risk doesn't exist).
- Other considerations for actioning Safe Outputs:
 - Consider an appropriate **risk threshold** for your data and determine how much transformation is required.
 - Confidentiality (who'll be viewing the data)
 - Engage legal / compliance teams / experts to assess the level of risk in a dataset
 - What's the current level of risk your organization accepts in its data?
 - "Output" could be a data set, statistical result or information extracted through a service or API; be clear on **what's happening to data downstream**.

Session 3: Turning Personal Data into Business Potential

Co-Moderated by Elizabeth Rushforth, EVP & Chief Legal Officer at Cota, Inc.

Co-Moderated by Anne Kimbol, Assistant General Counsel and Chief Privacy Officer at HITRUST.

Session attendees engaged in a deep-dive discussion focused on the following two challenges related to turning personal data into business potential:

- Creating an accurate inventory of data assets;
- Determining the real value of your data assets.

Challenge: Creating an accurate inventory of data assets

- Consider an asset inventory as a living document.
- When classifying data, consider the **context** in which data elements exist, then apply requirements to each data class (e.g. level of de-identification needed for CCPA).
- Ask yourself what resource investment is **sustainable** to scale an asset inventory while protecting data privacy.
- Attendees debated **how much data to keep**: on one end of the spectrum is that concept that “everything equals risk”, on the other is the notion that “what’s noise today is value tomorrow”.
- Ultimately, there needs to be a relevant **business reason** to keep data.

Challenge: Determining the real value of your data assets

- From a payer/provider perspective, a key consideration is how much money could be saved.
- AI consideration: if new knowledge comes from old data assets, do I own everything downstream?
- Attendees discussed the cost of using their data as a factor impacting data value (including GDPR compliance costs)
- Facebook, Google, LexisNexis, Flatiron Health were all cited by attendees as leaders in leveraging personal data for business potential.

Final Thoughts: What Keeps You Up at Night?

Comments from **Data Guardians** (CPO, Legal):

- Aside from a data privacy breach, it’s concerning when employees say, “Can we just (insert use case) with data?” (without understanding the implications).
- A key challenge for data guardians is not being in the know on important privacy issues affecting the company.

- “Trust is where everything starts.”

Comments from **Data Visionaries** (data and analytics leaders):

- **Risk management** – regulatory, privacy, legal considerations surrounding corporate data assets.
- It’s becoming easier to “lock data down”, **problems come from people (i.e. “well-intentioned insiders”)**.

Leveraging Data to Build Trust for a Healthy Business

A theme underpinning each of the day’s sessions was the role data plays in helping organizations build and maintain trust among its stakeholders. It was clear from the discussion that data, analytics and AI continue to play a central role in this regard.

Aligned with the theme of trust was a conversation about the value of data relative to strengthening corporate reputation; a discussion which took place August 1 during Privacy Analytics’ session titled, *Leveraging Data as Global Currency*.

Altogether the tone of discussions was optimistic notwithstanding the challenges that come with pushing the envelope of innovation.

Clearly data and analytics leaders are working hard at leveraging data to build trust for healthy businesses. It’s what will ultimately help set their organizations apart from the competition in today’s hyper-competitive market.