**COMMENTS ON REVISED HEALTH DATA MANAGEMENT POLICY**

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| **Change suggested by** | **ICICI Lombard General Insurance Company Limited** |
| **Date**  | **May 20, 2022** |
| **Sr. No.** | **Page No.** | **Clause / Sub-Clause No./****Para No.** | **Views / Comments / Changes suggested** | **Rationale** |
| 1. | 21 | 26. 6. Collection, Use and Storage Limitation | It is proposed for the kind evaluation of the Authority that aspects covering access to the data by health information users may be further specified such as creation of ABHA / User id for health information users (i.e. Insurance Companies). Further, facility of uploading health policy and claim details may be provided which will enhance the utility of the information.   | This will enable Insurance Companies in the capacity of Health Information Users to access the DATA at the time of underwriting the policies and will also help in smooth and speedy claim processing.Further, this will also help to curb the fraudulent practices in respect of insurance policies at various stages.  |
| 2. | 14 | 14.1.a.iii | It may be a practical challenge to map and publish a list of vendor\partner against the data principal. | For the purpose of servicing customers, relevant data may be shared with multiple partners such as laboratories, printing vendors etc. |
| 3.  | 15 | 14.2.f | It is proposed for the kind evaluation of the Authority that the system/process/channel for raising such requests by the data principal under clause 14.1 may be defined or identified. | The method and channel may be specified which can be traceable and auditable. |
| 4. | 6-7 | 4-O | While there is a provision in the draft for disclosure of withdrawal or denial of service / benefit, discrimination (defined as 'harm') when consent is being taken from the data principal, it is recommended that any such withdrawal / denial that is based on defined Policy Terms and Conditions contracted by the customer may not be considered as “harm”. | It is suggested to provide clarity in the health data management policy.  |
| 5. | 12 | 10.g | The repository of health records and data storage may be based on the compliance of corresponding industry’s statutory and regulatory body directives. For example, the period for which the personal data shall be retained, the right to forget/delete personal data. | It is suggested to provide clarity and ease out provisions in the health data management policy. |
| 6. | 20 | 26.2 | The information to be provided by the data fiduciary to the data principal may be allowed in electronic form | It is suggested to ensure convenience of data fiduciary and data principal.  |
| 7. | - | - | It is suggested that the consent for access of DATA from data principal (Insured) may be allowed to be procured at the time of underwriting of policies or registering of claims by way of proposal form or claim form respectively.  | This is intended to ensure speedy claims management and will also help in underwriting of policies.  |
| 8. | - | - | It is suggested that the Insurance Companies may be provided access to the DATA of data principal on similar lines as Banks have access to login and check CIBIL scores. | This will allow insurance companies in the capacity of data fiduciary to have greater access to the data of data principal. |
| 9. | - | - | Auto generation of health ID for the new-born child may be envisioned as part of this initiative. | This is intended to contribute towards automation/digitization.  |