

ATTACHMENT 11



**Department of
Civil Service**

**Freedom of Information Law Request for Redaction
Chart - "Health Maintenance Organizations
Specifications for the New York State Health Insurance
Program"**

Health Insurance Plan of Greater
New York d/b/a EmblemHealth Proposal Dated July 27, 2020
(Name of Company)

In response to the Specifications referenced above:

- Offeror asserts that the information noted in the table below constitutes proprietary and/or trade secret information or critical infrastructure information or otherwise falls within one of the other statutory exemptions pursuant the New York State Freedom of Information Law, Article 6 of the Public Officers Law (FOIL). The Offeror desires that such information not be disclosed if requested pursuant to FOIL.

- Offeror makes **NO** assertion that any information in its Proposal, in whole or in part, should be protected from FOIL disclosure.

Administrative Proposal:		
Requested Redaction Page #s and Proposal Sections or Attachment #	Description	Offeror Rationale for Proposed Redaction
Subcontractors, pgs. 12-24	Vendors	Confidential information from our subcontractors.
VRS, pages 26-128	Questionnaires	Confidential company and subcontractor info.
<i>Insert rows above as necessary</i>		
Technical Proposal:		
Requested Redaction Page #s and Proposal Sections or Attachment #	Description	Offeror Rationale for Proposed Redaction
Schedule M, pages 13-18	Complaints	Proprietary information internal to EmblemHealth.
Exhibits 3-6, pages 20-23	GeoAccess	Proprietary provider network information.
Questions #6-25, pgs.24-51	Processes	Confidential info regarding internal processes.
Wellness, pages 821-822	Programs	Confidential company program information.

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Employer Groups, page 824	Clients	Internal client group/size information.
<i>Insert rows above as necessary</i>		
All requested redactions set forth above and in the previous page contain confidential, proprietary information internal to EmblemHealth and is not suitable for public disclosure per the NYS Freedom of Information Law. Any public disclosure could create an unfair competitive advantage since competitors would have access to such information. Please see our redacted versions submitted for our approved versions suitable for public release.		

REDACTION CHART

Specific justification for each item for which you seek protection from FOIL disclosure must be provided in the above chart. An appropriate justification may be any one or more of the following considerations by which to demonstrate reasonably whether the item for which you seek protection may be excepted from disclosure:

- a) The confidential nature of the specific item, including a description of the nature and extent of the injury to the Offeror's competitive position, such as unfair economic or competitive damage, which would be incurred were the information/record to be disclosed;
- b) whether the specific information/record is treated as confidential by the Offeror, including whether it ever has been made available to any person or entity;
- c) whether any patent, copyright, or similar legal protection exists for the specific item of information;
- d) whether the public disclosure of the information/record is otherwise restricted by law, and the specific source and content of such restriction;
- e) the date upon which the information/record no longer will need to be kept confidential, if applicable;
- f) whether the item of information is known by anyone outside the Offeror's business or organization;

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- g) the extent to which the information is known by Offeror's employees and others involved in the Offeror's business;
- h) the value of the specific information/record to the Offeror and to its competitors;
- i) the amount of effort or money expended by the Offeror in developing the information/record; and
- j) the ease or difficulty with which the information could be properly acquired or duplicated (not merely copied) for use by others.