CAQH CORE 2015 Industry Market-based Adjustments Submission Period: Summary of Results

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1 Introduction

1.1 Background & Purpose

Per the <u>CAQH CORE Code Combinations Maintenance Process</u>, the CAQH CORE Code Combinations Task Group (i.e., Task Group) conducts two types of review and adjustment to the <u>CORE-required Code Combinations for the CORE-defined Business Scenarios</u> (i.e., CORE Code Combinations)¹: Compliance-based Reviews (CBRs) and Market-based Reviews (MBRs). Market-based Reviews occur once a year and consider adjustments to the <u>CORE Code Combinations</u> to address ongoing and evolving industry business needs. In December 2015, CAQH CORE initiated a public 60 day period, the <u>Industry-wide CAQH CORE 2015</u> <u>Market-based Adjustments Submission Period</u>, during which industry entities could submit potential Market-based Adjustments (i.e., additions, removals, and relocations) to the code combinations in the <u>existing CORE-defined Business Scenarios</u>.

This document summarizes the quantitative results of the *Industry-wide CAQH CORE 2015 Market-based Adjustments Submission Period* and serves as a reference to assist Task Group participants in completing the *Task Group Initial Straw Poll on Potential Market-Based Adjustments to the CORE-required Code Combinations for CORE-defined Business Scenarios v3.2.2 February 2016.* The Task Group MBR Initial Straw Poll will be sent to all Task Group participants on Wednesday, 03/16/16 with a completion deadline of **5 pm ET on Wednesday**, 04/06/16, giving Task Group Participants <u>3 weeks</u> to complete the straw poll.

The Task Group approved adjustments to the *February 2016 CORE Code Combinations* based on the Market-based Review will be published by 06/10/16 in the *CORE Code Combinations v3.3.0 June 2016*. The *June 2016 CORE Code Combinations* is also expected to include Task Group approved adjustments due to the Compliance-based Review in response to the <u>CARC</u> and <u>RARC</u> list updates published on 03/01/16 by the respective Code Maintenance Committees.

1.2 CAQH CORE 2015 Market-based Adjustments Form: Format

The Task Group spent significant time and effort to design the *CAQH CORE 2015 Market-based Adjustments Form*. To ensure that the submissions were well thought out, the online form required submitters to confirm that the requested code combination adjustment (i.e., addition, removal, or relocation) met the CORE Code Combination Evaluation Criteria, to provide a Strong Business Case for the code combination adjustment, and, optionally, to include a summary of Real World Usage Data to support the Business Case for each requested code combination adjustment. Submitters could exercise discretion as to whether or not to include Real World Usage Data. However, it was noted that including a Real World Data analysis could strengthen the Business Case for the requested addition or removal. Table 1 below identifies key sections of the Market-based Adjustments Submission Form.

¹ As of 01/01/14, all <u>HIPAA covered entities</u> must comply with the ACA-mandated <u>CAQH CORE EFT & ERA Operating Rules</u> when using the HIPAA-mandated EFT and ERA transaction standards, including the CAQH CORE 360 Rule and *CORE Code Combinations*.

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Table 1. Format of the Online CAQH CORE 2015 Market-based Adjustments Form

Part & Section Titles	Completion Instructions: Required/Discretionary	Additional Notes
Part I. General Overview & Submitter Information		
Section 1: Background, Scope, Format and Instructions	N/A	Informational
Section 2: Submitter Information	Required	Please complete all fields
Part II. Adjustments to Existing CORE-defined Business Scenario	s	
Section 3: Additions		
Section 3A: Specific Codes for Addition	Required	Complete all applicable fields
Section 3B: CORE Code Combination Evaluation Criteria for Additions	Required	Provide information to assist the Task Group in assessing whether your request meets the criteria
Section 3C: Business Case for Addition	Required	Complete all questions in this section
Section 3D: Discretionary Reporting of Supporting Real World Usage Data for Additions	Discretionary	Not required to be complete but encouraged to provide usage analysis data
Section 4: Removals		
Section 4A: Code for Removal	Required	Complete all applicable fields
Section 4B: CORE Code Combination Evaluation Criteria for Removals	Required	Provide information to assist the Task Group in assessing whether your request meets the criteria
Section 4C: Business Case for Removal	Required	Complete all questions in this section
Section 4D: Discretionary Reporting of Supporting Real World Usage Data for Removals	Discretionary	Not required to be complete but encouraged to provide usage analysis data
Section 5: Relocations to Existing Business Scenario		
Section 5A: Code Combination for Relocation	Required	Complete all applicable fields
Section 5B: CORE Code Combination Evaluation Criteria for Relocations	Required	Provide information to assist the Task Group in assessing whether your request meets the criteria
Section 5C: Business Case for Relocation	Required	Complete all questions in this section
Section 5D: Discretionary Reporting of Supporting Real World Usage Data for Relocations	Discretionary	Not required to be complete but encouraged to provide usage analysis data

1.3 Market-based Review of February 2016 CORE Code Combinations: Process & Scope

The CAQH CORE 2015 Market-based Adjustments Form allowed industry entities to submit adjustments to the CORE Code Combinations in the existing four CORE-defined Business Scenarios. Potential adjustments that could be submitted included:

- Addition or removal of existing CORE Code Combinations
- Relocation of a CORE Code Combination from an existing CORE-defined Business Scenario to another existing CORE-defined Business Scenario

Table 2 below describes the types of adjustments that could be submitted within each adjustment category:

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Table 2. Potential Code Combination Adjustments to Existing CORE-defined Business Scenarios

Additions ²	Removals	Relocations
1. Add CARC and RARC along with a CAGC(s)	1. Remove CARC and all associated RARCs and CAGC(s)	1. Remove CARC and all associated RARCs from an <i>existing</i> CORE-defined Business Scenario and add to another <i>existing</i> CORE-defined Business Scenario with associated CAGC(s)
2. Add CARC along with a CAGC(s)	2. Remove RARC and associated CAGC(s) from existing CARC	2. Remove CARC and all associated RARCs from an existing CORE-defined Business Scenario and add CARC and some or no associated RARCs to another existing CORE-defined Business Scenario with associated CAGC(s)
3. Add RARC to an existing CARC along with a CAGC(s)	3. Remove CAGC(s) from existing CARC	
4. Add CAGC(s) to an existing CARC	4. Remove an existing CAGC(s) from an existing CARC and RARC combination	
5. Add CAGC(s) to an existing CARC and its associated RARC		

NOTE:

- During the 2015 public Market-based Adjustments submission period, the most recent version of the CORE Code Combinations was the CORE Code Combinations v3.2.1 October 2015 (now deprecated). On 02/01/16, the October 2015 CORE Code Combinations was replaced by the current CORE Code Combinations v3.2.2 February 2016 which includes Compliance-based Adjustments to align with updates to the CARC and RARC lists published on 11/01/15. The Task Group will use the current February 2016 CORE Code Combinations to review the submissions received during the 2015 public Market-based Adjustments submission period.
- The CAQH CORE 2015 Market-based Adjustments Form validated CARC and RARC entries against the 11/01/15 code lists. Updates to the CARC and RARC lists were published on 03/01/16. To ensure compliance with the most current code lists, the Task Group will refer to the 03/01/16 code lists when considering submissions received during the 2015 Market-based Adjustments submission period. Additionally, concurrent with the Market-based Review, the Task Group will also consider Compliance-based Adjustments in response to the code list updates published on 03/01/16.

2 Summary of Respondents

Responses to the *CAQH CORE 2015 Market-based Adjustments Form* were received from **5 entities**, including 4 entities (80%) that create, use, or transmit the HIPAA mandated transactions in their daily business (i.e., HIPAA covered entity or Business Associate).³ Additional information about the respondents is provided in the tables below:

² Some CAGCs in code combination addition requests were adjusted as needed to ensure consistency with the CAGCs currently identified with CORE-required CARCs in the *CORE Code Combinations* and the CARC and RARC descriptions.

³ Respondents were asked to self-report if their organization creates, uses, or transmits the HIPAA mandated transactions in its daily business.

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Table 3. Number/Percent of Respondents by Stakeholder Type

Entity Type	# (%)
Total Number of Individual Organizational Responses	5 (100%)
Number of Health Plan Responses	3 (60%)
Number of Provider Responses	0 (0%)
Number of SDO/Association Responses	14 (20%)
Number of Government Health Plan Responses	1 (20%)
Number of Vendor/Clearinghouse Responses	0 (0%)
Number of "Other" Responses	0 (0%)

Table 4. Number/Percent of Respondents by CORE Participation, HIPAA Covered Entity, & HIPAA Transaction Usage

Categorization	Yes # (%)	No # (%)
CORE Participating Organization	4 (80%)	1 (20%)
HIPAA Covered Entity	4 (80%)	1 (20%)
Entity Creates, Uses, Transmits HIPAA Mandated Transactions	4 (80%)	1 (20%)

Table 5. Number/Percent of Respondents by MBR Training Webinar Attendance

Entity Attended MBR Training Webinar	# (%)
Yes	5 (100%)
No	0 (0%)

3 Summary of Code Adjustment Submissions for Existing CORE-defined Business Scenarios

A total of **173 requests** for adjustments to the *CORE Code Combinations* in the *existing* CORE-defined Business Scenarios were submitted during the 2015 potential Market-based Adjustments submission period:

- Of the 173 **total** submissions, 171 (99%) were unique⁵
- Of the 171 **unique** submissions, 9 (~5%) were determined to be invalid⁶

 $^{^4}$ SDO submission was a consensus responses developed by ~40 multi-stakeholder entities.

⁵ A unique submission is defined as a single concept that can be submitted by multiple respondents.

⁶ An invalid submission is defined as an adjustment that cannot be applied because it already exists in the *February 2016 CORE Code Combinations* or because it is noncompliant (e.g., addition of a CARC that requires a RARC by description but was submitted without an associated RARC).

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o **NOTE:** Section 8 of the Task Group MBR Initial Straw Poll asks respondents to indicate if their organization supports the CAQH CORE Staff recommendation that these 9 submissions are invalid and cannot be considered for application to the *CORE Code Combinations*.

As such, the Task Group will have **162 unique**, valid code adjustment submissions⁷ to consider. The tables in the subsections below provide more information regarding the 162 unique, valid code adjustment submissions.

3.1 Code Adjustment Submissions Per CORE-defined Business Scenario by Adjustment Category & Type

Table 6 below summarizes the number of submissions per CORE-defined Business Scenario by adjustment category. Of the 162 unique, valid code adjustment submissions, 90% (145 adjustments) were requests for additions and 10% (17 adjustments) were requests for removals. **NOTE:** No relocation requests were submitted.

Table 6. Number/Percent of Unique Submissions per CORE-defined Business Scenario by Adjustment Category

Adjustment Category	Business Scenario #1: Additional Information Required - Missing/Invalid/Incomplete Documentation	Business Scenario #2: Missing/Invalid/Incomplete Data from Submitted Claim	Business Scenario #3: Billed Service Not Covered by Health Plan	Business Scenario #4: Benefit for Billed Service Not Separately Payable	Total	% of Unique Submissions
Addition	1	32	109	3	145	90%
Removal	11	5	1	0	17	10%
Relocation	0	0	0	0	0	0%
Total	12	37	110	3	162	100%
% of Unique Submissions	7%	23%	68%	2%	100%	

Table 7 below summarizes the number of adjustment submissions per CORE-defined Business Scenario by adjustment type.

⁷ **NOTE**: One submission to add the CARC 97/RARC N167/CAGC CO, OA, PI, PR code combination to CORE-defined Business Scenario #4 was split into two questions in the Task Group MBR Initial Straw Poll. One question in the Initial Straw Poll asks respondents if they support adding the CARC 97/RARC N167 combination with CAGC OA and the second question asks respondents if they support adding the CARC 97/RARC N167 combination with CAGCs CO, PI, and PR. CAGC OA was separated due to the X12N v5010 835 TR3 specifications regarding limiting use of CAGC OA.

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Table 7. Number/Percent of Unique Submissions per CORE-defined Business Scenario by Adjustment Type

Adjustment Type	Business Scenario #1: Missing/Invalid/ Incomplete Documentation	Business Scenario #2: Missing/Invalid/ Incomplete Data from Submitted Claim	Business Scenario #3: Billed Service Not Covered by Health Plan	Business Scenario #4: Benefit for Billed Service Not Separately Payable	Total	% of Unique Submissions
		Additions				
Type #1. Add CARC and RARC along with a CAGC(s)	0	0	0	0	0	0%
Type #2. Add CARC along with a CAGC(s)	0	0	0	0	0	0%
Type #3. Add RARC to an existing CARC along with a CAGC(s)	1	31	107	1	140	86%
Type #4. Add CAGC(s) to an existing CARC	0	1	2	2	5	3%
Type #5. Add CAGC(s) to an existing CARC and its associated RARC	0	0	0	0	0	0%
		Removals				
Type #1. Remove CARC and all associated RARCs and CAGC(s)	0	0	1	0	1	1%
Type #2. Remove RARC and associated CAGC(s) from existing CARC	11	5	0	0	16	10%
Type #3. Remove CAGC(s) from existing CARC	0	0	0	0	0	0%
Type #4. Remove an existing CAGC(s) from an existing CARC and RARC combination	0	0	0	0	0	0%
	1	Relocations				
Type #1. Remove CARC and all associated RARCs from an <i>existing</i> CORE-defined Business Scenario and add to another <i>existing</i> CORE-defined Business Scenario with associated CAGC(s)	0	0	0	0	0	0%
Type #2. Remove CARC and all associated RARCs from an <i>existing</i> CORE-defined Business Scenario and add CARC and some or no associated RARCs to another <i>existing</i> CORE-defined Business Scenario with associated CAGC(s)	0	0	0	0	0	0%
Total	12	37	110	3	162	100%
% of Unique Submissions	7%	23%	68%	2%	100%	

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3.2 Code Adjustment Submissions Per CORE-defined Business Scenario by CARC and Adjustment Category & Type

The 162 unique and valid code adjustment submissions received for Task Group consideration address **62 unique CARCs.** For each CORE-defined Business Scenario, Table 8 below identifies the CARCs addressed and, for each impacted CARC, the number of submissions received per adjustment type.

Table 8. Number of Code Adjustment Submissions Per CORE-defined Business Scenario by CARC Addressed

			Addition				Removal				Relocation	
CARC	Type #1	Type #2	Type #38	Type#4 ⁹	Type #5	Type #1 ¹⁰	Type#2 ¹¹	Type #3	Type #4	Type #1	Type #2	Total
			Business Sce	nario #1: Ado					olete Document	ation		
					(Total # of	Unique CA	RCs Addresse	ed: 3)				
163	0	0	0	0	0	0	1	0	0	0	0	1
250	0	0	0	0	0	0	1	0	0	0	0	1
252	0	0	1	0	0	0	9	0	0	0	0	10
										Total # of	Submissions:	12
		Busin	ess Scenario	#2: Additiona					ata from Subm	itted Claim		
					(Total # of U	Jnique CAI	RCs Addressed	d: 12)				
4	0	0	4	0	0	0	0	0	0	0	0	4
15	0	0	1	0	0	0	0	0	0	0	0	1
16	0	0	10	1	0	0	0	0	0	0	0	11
18	0	0	2	0	0	0	0	0	0	0	0	2
107	0	0	2	0	0	0	0	0	0	0	0	2
110	0	0	2	0	0	0	0	0	0	0	0	2
140	0	0	2	0	0	0	0	0	0	0	0	2
175	0	0	4	0	0	0	0	0	0	0	0	4
181	0	0	2	0	0	0	1	0	0	0	0	3
182	0	0	1	0	0	0	1	0	0	0	0	2
208	0	0	1	0	0	0	0	0	0	0	0	1
240	0	0	0	0	0	0	3	0	0	0	0	3
	Total # of Submissions:									37		
	Business Scenario #3: Billed Service Not Covered by Health Plan (Total # of Unique CARCs Addressed: 45)											

⁸ Addition Type #3 Description: Add RARC to an existing CARC along with a CAGC(s).

⁹ Addition Type #1 Description: Add CARC and RARC along with a CAGC(s).

¹⁰ Removal Type #1 Description: Remove CARC and all associated RARCs and CAGC(s).

¹¹ Removal Type #2 Description: Remove RARC and associated CAGC(s) from existing CARC.

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	Addition						Re	moval		Relo	cation	
CARC	Type #1	Type #2	Type #38	Type#4 ⁹	Type #5	Type #1 ¹⁰	Type#2 ¹¹	Type #3	Type #4	Type #1	Type #2	Total
9	0	0	4	0	0	0	0	0	0	0	0	4
11	0	0	1	0	0	0	0	0	0	0	0	1
12	0	0	1	0	0	0	0	0	0	0	0	1
22	0	0	1	0	0	0	0	0	0	0	0	1
26	0	0	1	0	0	0	0	0	0	0	0	1
40	0	0	1	0	0	0	0	0	0	0	0	1
49	0	0	2	0	0	0	0	0	0	0	0	2
50	0	0	3	0	0	0	0	0	0	0	0	3
54	0	0	2	0	0	0	0	0	0	0	0	2
58	0	0	1	0	0	0	0	0	0	0	0	1
59	0	0	1	0	0	0	0	0	0	0	0	1
61	0	0	0	0	0	1	0	0	0	0	0	1
95	0	0	3	0	0	0	0	0	0	0	0	3
96	0	0	7	0	0	0	0	0	0	0	0	7
108	0	0	1	0	0	0	0	0	0	0	0	1
109	0	0	4	0	0	0	0	0	0	0	0	4
114	0	0	2	0	0	0	0	0	0	0	0	2
119	0	0	2	0	0	0	0	0	0	0	0	2
150	0	0	4	0	0	0	0	0	0	0	0	4
151	0	0	6	0	0	0	0	0	0	0	0	6
160	0	0	1	0	0	0	0	0	0	0	0	1
165	0	0	6	0	0	0	0	0	0	0	0	6
167	0	0	3	0	0	0	0	0	0	0	0	3
169	0	0	1	0	0	0	0	0	0	0	0	1
171	0	0	1	0	0	0	0	0	0	0	0	1
172	0	0	1	0	0	0	0	0	0	0	0	1
173	0	0	1	0	0	0	0	0	0	0	0	1
174	0	0	1	0	0	0	0	0	0	0	0	1
177	0	0	2	0	0	0	0	0	0	0	0	2
179	0	0	1	0	0	0	0	0	0	0	0	1
183	0	0	0	1	0	0	0	0	0	0	0	1
184	0	0	2	0	0	0	0	0	0	0	0	2
185	0	0	6	0	0	0	0	0	0	0	0	6
188	0	0	2	0	0	0	0	0	0	0	0	2
198	0	0	2	0	0	0	0	0	0	0	0	2

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		Addition					Re	moval		Relo	cation	
CARC	Type #1	Type #2	Type #3 ⁸	Type#4 ⁹	Type #5	Type #1 ¹⁰	Type#2 ¹¹	Type #3	Type #4	Type #1	Type #2	Total
204	0	0	13	0	0	0	0	0	0	0	0	13
210	0	0	0	1	0	0	0	0	0	0	0	1
239	0	0	1	0	0	0	0	0	0	0	0	1
249	0	0	1	0	0	0	0	0	0	0	0	1
B1	0	0	1	0	0	0	0	0	0	0	0	1
B7	0	0	4	0	0	0	0	0	0	0	0	4
B13	0	0	3	0	0	0	0	0	0	0	0	3
B15	0	0	1	0	0	0	0	0	0	0	0	1
B16	0	0	2	0	0	0	0	0	0	0	0	2
B20	0	0	4	0	0	0	0	0	0	0	0	4
										Total # of	Submissions:	110
				Business Sc			ed Service Not		yable			
	(Total # of Unique CARCs Addressed: 2)											
24	0	0	0	1	0	0	0	0	0	0	0	1
97	0	0	1	1	0	0	0	0	0	0	0	2
										Total # of	Submissions:	3

4 Next Steps

Listed below are the key next steps for the Code Combinations Task Group regarding the 2015 Market-based Review of the *February 2016 CORE Code Combinations*:

- 1. **03/16/16 04/06/16:** Complete the *Task Group Initial Straw Poll on Potential Market-based Adjustments to the CORE Code Combinations February 2016 v3.2.2.*
- 2. **04/19/16 Task Group Call:** Discuss Initial Straw Poll results and agree on subset of Market-based Adjustments to the *CORE Code Combinations February 2016 v3.2.2.*
- 3. **05/02/16 05/11/16:** Complete *Task Group Follow-up Straw Poll on Potential Market-based Adjustments to the CORE Code Combinations February 2016 v3.2.2* identified via the Initial Straw Poll and Task Group discussion.
 - a. Prior to launch of the MBR Follow-up Straw Poll, Task Group Participants will be asked to submit any rationale in support or not in support of the code combinations to be included on the Follow-up Straw Poll. The rationale received will be distributed with the MBR Follow-up Straw Poll for consideration by the Task Group respondents. The Task Group MBR Follow-up Straw Poll Rationale Submission Period will open on 04/21/16 and close on 04/27/16.
- 4. **05/17/16 Task Group Call:** Discuss Follow-up Straw Poll results and agree on final Market-based Adjustments to the *CORE Code Combinations February 2016 v3.2.2.*

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5.	By 06/10/16 - Goal: Per CAQH CORE policy, publish the CORE-required Code Combinations for CORE-defined Business Scenarios for CAQH CORE
	Rule 360 v3.3.0 June 2016 on the CAQH CORE website to ensure compliance is met. The June 2016 CORE Code Combinations is expected to also
	include Task Group approved Compliance-based Adjustments in response to the updated code lists published 03/01/16.