



Phase I CAQH CORE 102: Eligibility and Benefits Certification Policy  
version 1.1.0 March 2011

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**GUIDING PRINCIPLES**

- *After signing the CORE Pledge, the entity has 180 days to complete CORE certification testing.*
- *CORE will not certify Phases that CORE has not clearly defined and voted upon.*
- *CORE certification testing will be required by any entity seeking CORE certification. CORE will authorize testing entities to conduct CORE certification testing. All CORE-authorized testing entities will need to be capable of testing for all Phase I CORE Operating Rules.*
- *Certification will be available for both real-time and batch processing. However, if an entity does not support batch transactions, it will not be required to comply with the batch rules. An entity that supports both real-time and batch will be required to comply with rules for both. The test scripts allow for the ability to test for both types of processing for each rule.*
- *Upon successful completion of CORE certification testing, CORE entities will receive a CORE certification “Seal” from CAQH.*
- *Entities seeking CORE certification will be required to adopt all of Phase I CORE Operating Rules that apply to their business and will be responsible for all their own company-related testing costs.*
- *CORE will not oversee trading partner relationships. CORE-certified entities may work with non-CORE-certified entities if they so desire.*
- *Role of HIPAA compliance:*
  - *It will be assumed by CORE that any covered entity under HIPAA applying for CORE certification will be HIPAA compliant; when submitting testing certification documentation to CORE, covered entities will be asked to sign an attestation form attesting that they are HIPAA compliant to the best of their knowledge (“Attestation Form”) for security, privacy, and the ASC X12 005010X279A1 Eligibility Benefit Request and Response (270/271) Technical Report Type 3 transaction. HIPAA compliance will not be defined by CORE.*
- *Role of CORE-authorized testing vendors:*
  - *CORE-authorized testing vendors will be expected to sign the Attestation Form on their own behalf as well, demonstrating that they support a compliant 270/271 transaction.*
- *Who will be certified:*
  - *Certification testing will vary based on participant type. Associations, medical societies and the like will not be certified; instead, these entities will receive a Phase I CORE “Endorser” Seal after signing the Pledge. Entities successfully achieving Phase I CORE certification will receive the Phase I CORE “Seal” that corresponds with their testing application as testing varies by stakeholder type. There will be five different types of CORE “Seals”:*
    - *CORE-certified health plan*
    - *CORE-certified vendor (product specific)*
    - *CORE-certified clearinghouse*
    - *CORE-certified provider*
    - *CORE Endorser (for entities that do not create, use, or transmit eligibility information)*
  - *A parent corporation seeking certification will not be certified unless all subsidiaries of the corporation are compliant with Phase I CORE Operating Rules. Otherwise, each subsidiary of the parent must individually seek certification. For vendors, CORE will apply only to vendor products rather than corporate entities.*
  - *Ancillary services are not assumed to be subsidiaries, as a subsidiary is a legal entity of its own that serves as one of the types of key stakeholders that can become certified, e.g., health plan, vendor, or clearinghouse.*

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- *If a Phase I CORE-certified entity is acquired by an entity that is not Phase I CORE-certified, that company will only be allowed to be Phase I CORE-certified if the acquired company is the only business that is applicable to the Phase I CORE Operating Rules. If this is not the case, then the newly merged company will be required to seek certification.*
- *Endorsers will not become certified, but will be expected to participate in the CORE public relations campaign, provide CORE feedback and input when requested to do so, and encourage their members to consider participating in CORE.*

### **POLICY**

#### **Section 1: Fees**

- Entities seeking Phase I CORE certification will be charged two fees: fees related to Phase I CORE certification testing as determined by the CORE-authorized Testing Vendor and the fee for the Phase I CORE Seal as determined by CORE. The goal of CORE is to develop a low-cost certification process in order to support CORE market adoption by small and large entities.

#### **Section 2: Period for Which Certification Applies**

- Once certified, Phase I CORE-certified entities will remain compliant with applicable Phase I CORE Operating Rules throughout any system upgrades. When vendors release new versions of their products that affect the functionality of Phase I CORE Operating Rules, such versions will need to become Phase I CORE-certified in order to maintain the Phase I CORE Seal.
- Assuming certification is not revoked, Phase I CORE certification, except for vendor products, will remain valid until a new version of the Phase I CORE Operating Rules is established by vote. In Phase I, revisions will not be made to the Phase I CORE Operating Rules more than once (1) per year. Although revisions to the rules will become official 20 business days after enacted by CORE, CORE-certified entities will determine when/if they will become compliant with new phases of the rules.

#### **Section 3: Key Steps**

The five key steps of CORE certification are presented below:

**Subsection 3.1: Step 1:** Existing entities currently engaged in HIPAA testing will be “authorized” by CORE as CORE-authorized Testing Vendors if they meet certain criteria.

- CORE-authorized Testing Vendors will test the Phase I CORE Certification Test Suite developed by the CORE Testing Subgroup.
- CORE will allow any interested entity to apply to CORE to become a CORE-authorized Testing Vendor. However, to become a CORE-authorized Testing Vendor, an interested testing entity must be capable of testing for all Phase I CORE Operating Rules and meet a CORE developed set of criteria. An RFP process will identify authorized companies.
- CORE will list any testing entity that is a CORE-authorized testing entity on its website.

**Subsection 3.2: Step 2:** CORE participants seeking certification will work with the CORE-authorized Testing Vendor of their choice to test for CORE compliance.

- Certification testing will differ by role of generator/submitter in the eligibility transaction.
- Any fee/cost imposed by a CORE-authorized Testing Vendor will be independent and separate from the fee CORE will charge to obtain the Phase I CORE Seal. Certification testing fees will be established by each CORE-authorized Testing Vendor; thus prices will be market-driven.
- A CORE-authorized Testing Vendor will only provide paperwork to an entity seeking certification after demonstrating successfully their ability to conform with the Phase I CORE Operating Rules.

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**Subsection 3.3: Step 3:** CORE will grant the appropriate Phase I CORE Seal after an entity provides all documentation required, including documentation from a CORE-authorized Testing Vendor demonstrating the entity's compliance with Phase I CORE Operating Rules through successful testing.

- CORE will be responsible for providing the official Phase I CORE Seal (after compliance is proven).
- CORE (or its agents) will review test results and maintain a record of Phase I CORE-certified entities.
- Applicants will be responsible for ensuring that an authorized person signs the final Phase I CORE certification application and the HIPAA attestation, indicating that to the best of the potential applicant's knowledge, the applicant is HIPAA compliant for security, privacy, and the ASC X12 005010X279A1 Eligibility Benefit Request and Response (270/271) Technical Report Type 3 (or, in the case of a vendor, supports the ASC X12 005010X279A1 Eligibility Benefit Request and Response (270/271) transaction).
  - See attached Attestation form.
- Upon receiving documentation of successful completion of Phase I CORE certification testing from an applicant, CORE will have a maximum of 20 business days to complete its assessment of the documentation and respond to the applicant with a clear response of approval or need for clarification. CORE will inform those who apply for certification of the "certification" queue status at the time of their application submission. CORE will complete its assessment within 30 business days unless there are extenuating circumstances. CORE will report on its website:
  - List of certified entities.
  - The number of certification applications it has received.
  - The number that are in process/were rejected on a monthly basis.
- The fee for the Phase I CORE Seal will be based upon a sliding, stakeholder-specific fee scale, similar to the approach of the current CORE membership fee policy. There will be an "early adopters" CORE certification discount on the fee for the Phase I CORE Seal to encourage entities to become Phase I CORE-certified as quickly as possible after the final Phase I CORE Operating Rules are approved.
- The cost of the Phase I CORE Seal will be a one-time fee, unlike the CORE participation fee, which is an annual fee. The Phase I CORE Seal indicates that an entity/product is Phase I CORE-certified, while the CORE participation fee allows entities to participate in the CORE rule writing and voting process. CORE participants may voluntarily decide whether or not to become CORE-certified entities.
- Phase I CORE certification will be effective until a new version of the Phase I CORE Operating Rules is made available, provided an organization has no complaints filed against it, except for vendors, who will be required to seek new Phase I CORE certification when a new version of a previously CORE-certified eligibility and benefits product is released.
- If an entity removes its name from the Pledge, it automatically loses Phase I CORE certification.
- As stated in the Pledge, a Phase I CORE-certified entity is permitted to market its Phase I CORE Seal only if the entity's Phase I CORE Seal is valid and current.

**Subsection 3.4: (Potential) Step 4:** Re-certification will be required if an entity's Seal is revoked as a result of a validated complaint of non-compliance. (See enforcement for steps involved in the complaint process.)

- See enforcement process regarding how a validated complaint of non-compliance will be defined and pursued.

**Subsection 3.5: Step 5:** Re-certification when Phase I CORE Operating Rules are modified.

- Phase I CORE Operating Rules will become official 20 business days after being approved by CORE; however, adoption of the rules is not required by participants until 180 business days after signing the Pledge, and a similar timeframe for participant adoption will be added for revisions.
- CORE reserves the right to revise rule(s) in Phase I.

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- Minor modifications that would improve a rule will not require re-certification.
- Major substantive changes, e.g. new phases, will require re-certification and re-signing of the Pledge.
- Except for vendors and entities with validated non-compliance, re-certification will be required only after CORE membership approves, by vote, major modifications, changes, or deletions to Phase I CORE Operating Rules. Only one major modification will be permitted in the first year of Phase I.
- Generally, Phase I CORE Operating Rules will not be amended between CORE rule versions unless government regulations are issued that impact the rules or as necessary to address problems that arise upon implementation. In this scenario, adoption of the modified rule(s) by CORE participants will be within a reasonable timeframe but will acknowledge/comply with Federal mandates.

**Section 4: Certification Testing Appeals Process**

- Prior to any appeal being submitted, it is assumed efforts have already been taken to try to resolve the issue privately between an entity seeking certification and a CORE-authorized Testing Vendor, but efforts have not succeeded.
- In the event an entity seeking Phase I CORE certification is not satisfied with its testing results, it is permitted to file an appeal of the results to CORE.
- CORE will have 20 business days to investigate the issue. If the appeal is deemed valid, CORE will ask the CORE-authorized Testing Vendor to re-test the results in question within 21 business days of request.
- The Enforcement Committee will have oversight of this process. Please see the Phase I CORE 105 Eligibility and Benefits Enforcement Policy version 1.1.0 for more details.