

Phase II CAQH CORE 202 Certification Policy version 2.1.0 March 2011

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GUIDING PRINCIPLES

- After signing the CORE Pledge and/or Addendum, 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 II 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 Phase II CORE certification testing, CORE entities will receive a Phase II CORE certification "CORE Seal" from CAQH.
- Entities seeking Phase II CORE certification will be required to adopt all of Phase II CORE Operating Rules that apply to their business and will be responsible for all their own company-related testing costs.
- Entities undergoing Phase II CORE certification testing must be Phase I CORE certified or concurrently testing for compliance with Phase I Operating Rules, except in the case of vendors and clearinghouses that do not conduct eligibility v5010 270/271 transactions. (e.g., vendors/clearinghouses that offer only v5010 276/277 claim status transactions can become Phase II certified without being Phase I certified.)
- 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 v5010 270/271 and/or v5010 276/277 transaction(s). 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 compliant v5010 270/271 and v5010 276/277 transactions.
- 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 CORE "Endorser" Seal after signing the Pledge. Entities successfully achieving CORE certification will receive the 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 (product specific)*
 - CORE-certified provider
 - CORE Endorser (for entities that do not create, use, or transmit eligibility and/or claim status information)
 - A parent corporation seeking certification will not be certified unless all subsidiaries of the corporation are with compliant 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 CORE-certified entity is acquired by an entity that is not CORE-certified, that company will only be allowed to be CORE-certified if the acquired company is the only business that is applicable to the CORE Operating Rules. If this is not the case, then the newly merged company will be required to seek certification.
- If a CORE-certified entity begins offering a new transaction for which CORE certification exists, or it acquires an organization that offers the transaction, the entity will have 12 months to certify that new transaction; if the CORE-certified entity does not certify for the new transaction, it will lose its CORE Seal. (Note: An entity has 180 days to complete CORE Certification Testing once the Pledge has been signed.)
- 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 II CORE certification will be charged two fees: fees related to CORE certification testing
as determined by the CORE-authorized Testing Vendor and the fee for the 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, CORE-certified entities will remain compliant with applicable CORE Operating Rules throughout
 any system upgrades. When vendors release new versions of their products that affect the functionality of CORE
 Operating Rules, such versions will need to become CORE-certified in order to maintain the CORE Seal.
- Assuming certification is not revoked, CORE certification, except for vendor products, will remain valid until a new version of the CORE Operating Rules is established by vote. Revisions will not be made to the CORE Operating Rules more than once (1) per year. Revisions to approved CORE Operating Rules, if necessary, will become official 20 business days after enacted by CORE. (Version is defined as a substantive change to any approved Phase of CORE Operating Rules that requires full CORE membership consent.) 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 in conformance 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 entities using the Phase II CORE Certification Test Suite.
- 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 vendor must be capable of testing for all Phase I and Phase II CORE Operating Rules and meet a CORE-developed set of criteria. An RFP and beta approval process will identify authorized companies.
- CORE will list any testing vendor that is a CORE-authorized Testing Vendor 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 and/or claim status request 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 CORE Seal. Certification testing fees will be established by each COREauthorized Testing Vendor; thus prices will be market-driven.

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- If a vendor or clearinghouse does not offer a product/service for which CORE certification exists in Phase II, it must submit an attestation to this fact.
- A CORE-authorized Testing Vendor will only provide paperwork to an entity seeking certification after demonstrating successfully their ability to conform with the rules.

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

- CORE will be responsible for providing the official CORE Seal (after compliance is proven).
- CORE (or its agents) will review test results and maintain a record of CORE-certified entities.
- Applicants will be responsible for ensuring that an authorized person signs the final CORE certification
 application and the HIPAA attestation, indicating that to the best of the potential participant's knowledge, the
 applicant is HIPAA-compliant for security, privacy, and the v5010 270/271 and/or v5010 276/277 claim status
 transactions (or, in the case of a vendor, supports the v5010 270/271 and/or v5010 276/277 claim status
 transactions).
 - See attached Attestation form.
- Upon receiving documentation of successful completion of CORE certification testing from an applicant, CORE will have a maximum of 20 business days to 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.
 - In the case of vendors and clearinghouses, the CORE-certified transaction(s) processed by their product.
- The fee for the Phase II CORE Seal will be the same as the Phase I CORE Seal fee, regardless of the number of transactions for which an entity has completed Phase II testing.
- The cost of the CORE Seal will be a one-time fee, unlike the CORE participation fee, which is an annual fee. The CORE Seal indicates that an entity/product is CORE-certified, while the CORE participation fee allows entities to participate in the CORE Operating Rule writing and voting process. CORE participants may voluntarily decide whether or not to become CORE-certified entities.
- CORE certification will be effective until a new version of the 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 CORE certification when a new version of a previously CORE-certified product is released.
- If an entity removes its name from the Pledge, it automatically loses CORE certification.
- When new phases are approved by the CORE membership, recertification by a CORE-certified entity is not required for an already certified phase.
- As stated in the Pledge, a CORE-certified entity is permitted to market its CORE Seal only if the entity's CORE Seal is valid and current.

Subsection 3.4: (**Potential**) **Step 4:** Recertification will be required if an entity's CORE 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.

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Subsection 3.5: Step 5: Recertification when CORE rules are modified.

- 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 the rules.
- Minor modifications that would improve a rule will not require recertification (see CORE version control document).
- Major substantive changes, e.g., new phases, will require recertification and re-signing of the Pledge relative to the new phase, should the entity choose to pursue certification for the new phase.
- Except for vendors and entities with validated non-compliance, recertification will be required only after CORE membership approves, by vote, major modifications, changes, or deletions to CORE Operating Rules.
- Generally, CORE Operating Rules will not be amended between CORE Operating Rule phases unless government regulations are issued that impact the CORE Operating 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 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 CORE Enforcement Committee will have oversight of this process. Please see the Phase II CORE 205 Enforcement Policy version 2.1.0 for more details.