

October 6, 2023

Micky Tripathi, Ph.D., MPP National Coordinator for Health IT Office of the National Coordinator for Health Information Technology U.S. Department of Health and Human Services 330 C St SW, Floor 7 Washington, DC 20201

Re: CORE Comments to the Request for Review and Comment of the 2024 Interoperability Standards Advisory (ISA)

Dear Dr Tripathi,

CORE appreciates this opportunity to add new developments and address inconsistencies during the Interoperability Standards Advisory (ISA) open comment period. This valuable undertaking reinforces the role of the ISA as a recognized source of information for standards, implementation specifications, operating rules, and other utilities that support interoperability in the exchange of healthcare information.

The CAQH Committee on Operating Rules for Information Exchange (CORE) is a non-profit, national multistakeholder collaborative that drives the creation and adoption of healthcare operating rules that support standards, accelerate interoperability, and align administrative and clinical activities among provider, payers, and consumers. CORE participating organizations represent 75% insured Americans, including health plans, providers, electronic health record (EHR) and other vendors/clearinghouses, state and federal government entities, associations, and standards development organizations. CORE is designated by the Secretary of the Department of Health and Human Services (HHS) as the Operating Rule Authoring Entity for HIPAA-mandated administrative transactions. Operating rules are developed by CORE participants via a multi-stakeholder, consensus-based process.

CORE recommends several edits to the ISA that promote consistent operating rule naming conventions, address non-uniform language in the operating rule descriptions, and accommodate the inclusion of emerging updates to the operating rule set. These updates are divided into two sections.

- Section 1 aligns operating rule nomenclature on the ISA website directory with those included in the operating rule descriptions.
- Section 2 contains suggested edits to each operating rule subsection that ensure consistent use of language and reflect current developments and updates.

Thank you for your time and consideration of our suggestions. Please feel free to contact me directly at <u>eweber@caqh.org</u> or 202-517-0435.

Sincerely,

Erin Richter Weber Vice President, CORE



CAQH CORE Comments to the Request for Review and Comment of the 2024 Interoperability Standards Advisory (ISA)

Section 1: Recommendations for Standardizing CORE Operating Rule Nomenclature on the ISA Website

It is important for any industry resource – including CORE Operating Rules – to use consistent naming conventions that promote recognition and reduce confusion. There are several instances of inconsistent naming or labeling on the ISA Website: "<u>Operating Rules to Support Administrative Transactions</u>." The current state of the referenced website is shown in **Figure 1**.

Figure 1: "Operating Rules to Support Administrative Transactions" Current Listing

Operating Rules to Support Administrative Transactions

- Attributed Patient Roster
- CAQH® CORE Operating Rules for Enrollment and Disenrollment
- CAQH® CORE Operating Rules for Premium Payments
- CAQH® CORE Operating Rules for Prior Authorization and Referrals
- Connectivity for Operating Rules
- Eligibility and Benefits Operating Rules for Standard Transactions
- Operating Rules for Electronic Funds Transfer (EFT) and Electronic Remittance Advice (ERA)
- Operating Rules for Health Care Claims
- Operating Rules to Support Claim Status Transactions
- Operating Rules to Support Electronic Prescribing Transactions

Kealth Care Claims or Equivalent Encounter Information for Retail Pharmacy Supplies and Professional Services

CORE recommends amending the names listed in **Figure 1** to read as the following to maintain consistency throughout the ISA resource.

- CAQH CORE Operating Rules for the Exchange of an Attributed Patient Roster
- CAQH CORE Operating Rules for Benefit Enrollment and Disenrollment
- CAQH CORE Operating Rules for Premium Payment
- CAQH CORE Operating Rules for Prior Authorization & Referrals
- CAQH CORE Operating Rules for Connectivity

- CAQH CORE Operating Rules for Eligibility & Benefits
- CAQH CORE Operating Rules for Electronic Funds Transfer (EFT) & Electronic Remittance Advice (ERA)
- CAQH CORE Operating Rules for Health
 Care Claims
- CAQH CORE Operating Rules for Claim Status

These naming conventions should be carried over as the titles for each individual CORE Operating Rule Webpage in the ISA.



Sections 2: Line Edits and Additions to Individual CORE Operating Rule Webpages

This appendix contains detailed content recommendations for consistency and clarity across listed operating rules.

A. CAQH CORE Operating Rules for the Exchange of an Attributed Patient Roster

Туре	Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability
Operating Rules	CAQH® CORE Operating Rules for the Exchange of an Attributed Patient Roster: • Data Content • Infrastructure	Final	Feedback requested Production	Feedback requested	No	Free	Yes ^{\$}
Limitation Considera	is, Dependencies, an ation	d Preconditio	ons for	Applicable	Security Pat	terns for	Consideration
 as a re Care A Simplif Operatiuse of require uniform complet Operatipatient contract Testing availab author program 	ting rules for HIPAA sta equirement of the Patie act of 2010, under Sec fication. ting rules are intended standard transactions ements to help implem n way across health p ete set of information i ting rules for the elect ts attributed to the pro ct are available for vo g or certification with o ble through a vendor o ing entity, which also m. CAQH CORE mail ing rule implementatio	ent Protection ction 1104, Adu d to support ar s. They may in hent the transa- lans, and to en in the respons ronic exchang vider under a luntary use by operating rules contracted to C supports volur ntains free too	and Affordable ministrative nd enhance the clude certain action in a more nsure a more e. e of a roster of value-based covered entities. s is voluntary and CORE the ntary certification is to support	• Feedba	ck requested.		

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B. CAQH CORE Operating Rules for Benefit Enrollment and Disenrollment

Туре	Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability	
Operating Rules	CAQH CORE Operating Rules for Benefit Enrollment and Disenrollment: • Infrastructure	Final	Production	•••00	No	Free	Yes ^s	
Limitation Considera	s, Dependencies, ar tion	nd Preconditio	Applicable Security Patterns for Consideration					
 include and Aff Admini Operat use of include 	ing rules for HIPAA s d added as a require fordable Care Act of strative Simplification ing rules are intended the adopted HIPAA s certain requirements	ement of the Pa 2010, under S n. d to support at standard transa s to help imple	atient Protection ection 1104, nd enhance the actions. They may ment the	■ Feedba	ck requested.			
provide in the r standa	ction in a more uniformers, and to ensure a response. , and more rds. -CORE has develope	nore complete consistent use	e set of information of the adopted					
	nent and Disenrollme ary use by covered er		vailable for					
Benefit	as adopted operating ts and Claim Status (: er and Electronic Rer	2011), and Ele	ectronic Funds					
other H Disenre	202 <mark>32</mark> , HHS has not y IIPAA transaction sta ollment, Premium Bill uthorization.	indards, incluc	ling Enrollment and					
Enrolln	CORE has develope nent and Disenrollme ary use by covered er	nt which are a						
availab There i mainta implem	g or certification with ole through a vendor o is a fee for certification ins <u>free tools</u> to supp mentation. Additionally ional webinars which	contracted to (on, however, C ort operating r /, CAQH-COR	CAQH CORÉ. AQH CORE ule E offers					



C. CAQH CORE Operating Rules for Premium Payments

Туре	Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability
Operating Rules	CAQH CORE Operating Rules for Premium Payments: • Infrastructure	Final	Production	•••00	No	Free	Yes ^{\$}
Limitation Considera	s, Dependencies, an Ition	d Preconditio	Applicable	Security Patt	terns for (Consideration	
include and Af	ting rules for HIPAA s ad added as a require fordable Care Act of 2 istrative Simplification	ment of the Pa 2010, under s -	▪ Feedba	ick requested.			
use of include transac provide	ting rules are intended the adopted HIPAA s e certain requirements ction in a more uniforn ers, and to ensure a n response. , and more a rds.	tandard transa to help imple m way betwee nore complete					
	has developed Opera ents which are availab s.						
Benefit	as adopted operating ts and Claim Status (ź er and Electronic Ren	2011), and Ele	ctronic Funds				
other F and Dis	202 23 , HHS has not y HPAA transaction sta senrollment, Premiun ior Authorization.	ndards, includ	ing Enrollment				
	CORE has develope onts which are availab 3.						
availab There i mainta implem	g or certification with o ble through a vendor o is a fee for certificatio ins <u>free tools</u> to supp nentation. Additionally <u>ional webinars</u> which	contracted to C n, however, C ort operating r v, CAQH COR	CAQH CORÉ. AQH CORE ule E offers				



D. CAQH CORE Operating Rules for Prior Authorization and & Referrals

Туре	Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability
Operating Rules	CAQH CORE Operating Rules for Prior Authorization and Referrals: <u>Data Content</u> <u>Infrastructure</u> <u>Web Portal</u> <u>Attachments</u> <u>Data Content</u> <u>Attachments</u> Infrastructure	Balloted Draft-Final	Feedback requested Production	Feedback requested	No	Free	<u>Yes</u> \$
Limitation Considera	s, Dependencies, an ation	d Preconditio	ons for	Applicable	Security Pat	terns for (Consideration
as a re Care A Simplif Operatuse of help in betwee comple	ting rules for HIPAA s equirement of the Pati Act of 2010, under Sec fication. ting rules are intended standard transactions nplement the transact en health plans and p ete set of information ORE Prior Authorizati are available for volu	ent Protection ction 1104, Ad d to support ar s. They include ion in a more r roviders and e in the respons on and Referm	and Affordable ministrative nd enhance the e requirements to uniform way nsure a more e. als Operating	• Feedba	ck requested.		
 In 202 Author 	2, the CAQH CORE (ization and Referrals onic exchange of attac	Operating Rule were updated	to support the				
Eligibil service verifica CORE	onally, updates to the ity & Benefits allow he e requires prior author ation in real-time, at th Operating Rule for E mended for federal ac	ealth plans to i rization during ne point-of-car ligibility and B	ndicate whether a eligibility e. The updated enefits was				
Benefi	as adopted operating ts, Claim Status (201 ectronic Remittance <i>I</i>	1), Electronic F					
HIPAA	as not adopted Opera standards, including Claims, Enrollment/E	Prior Authoriz					



 The CAQH CORE Prior Authorization and Referrals Operating Rules are available for voluntary use by covered entities. 												erec	1 -
 In 2022, the CAQH CORE Operating Rules for Prior Authorization and Referrals were updated to support the electronic exchange of attachments and medical information. 	l s v	als v	ls w	/ere	up	da	ted	l to	su	рро	ort tł		ən.
 <u>Testing or certification</u> with operating rules is voluntary and available through a vendor contracted to CAQH-CORE. There is a fee for certification, however, CAQH-CORE maintains free tools to support operating rule implementation. Additionally, CAQH-CORE offers educational webinars which are archived on its website. 	r cc ion poi lly,	or co ation uppo ally,	r col ion, port Ily, (ntra , ho rt op CA (acte we bera QH	əd ver atir	t o (r , E ng i OR	CA CAC rule RE d	QH QH QH e offe	-CC -CO ers	DRÉ RE	Ξ.	ł

E. CAQH CORE Operating Rules for Connectivity for Operating Rules

Туре	Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability
Operating Rules	CAQH CORE Operating Rules for Connectivity	Final	Production		<u>Yes</u>	Free	<u>Yes</u> ^{\$}
Limitation Consider	ns, Dependencies, an ation	d Preconditio	Applicable Security Patterns for Consideration				
added Afford	ting rules for HIPAA s as a requirement of tl able Care Act of 2010 istrative Simplification	ne Patient Prot , under Sectio	■ Feedba	ck requested.			
use of requir unifor	ting rules are intended standard transactions ements to help implen n way across health p ete set of information	s. They may in nent the transa lans and ensu	clude certain action in a more ire a more				
adopti rules l	ORE Operating Rules on and implementatio by establishing key rec e exchange of health o	n of transactio quirements to r	n-based operating maintain the				
CAQ⊢ CORE two ve	2 and 2013 HHS adop CORE Operating Ru Connectivity Rule en ersions of the CORE C were incorporated by	les including tv nbedded in the Connectivity Op	wo versions of the use operating rules perating Rules,				
Conne	versions of the CAQH ectivity are available o ting Rules website.						

•	Adoption of operating rules for HIPAA standards is a requirement of the Patient Protection and Affordable Care Act of 2010, under section 1104, Administrative- Simplification.	
•	In 2020, CAQH CORE has updated its Operating Rules for Connectivity to <u>version C4.0.0</u> to enhance security protocols, and to support REST and SOAP. Updated rules The updated Rule is are available for voluntary use by covered entities.	
•	CORE Connectivity Rule <u>vC4.0.0</u> was recommended for Federal adoption by the National Committee of Vital Health and Statistics (NCVHS) to the Department of Health and Human Services (HHS) in June 2023.	
•	Adopted operating rules are are incorporated by reference- at § 162.920 and are available on the <u>CAQH CORE</u> Mandated Operating Rules website.	
•	In 2020, CAQH CORE updated its phase-based operating- structure to align with the business processes of covered- entities. The phased structure was retired. HHS has not- released new policies or guidance to adopt the documents- or revisions.	
•	Testing, or certification with the operating rules is voluntary and available through a vendor contracted to CORE the- authoring entity. There is a fee for certification, however, CAQH CORE maintains free tools to support operating rule implementation. Additionally, CAQH CORE offers educational webinars which are archived on its website.	
•	Note: Portions of the Updated CORE Connectivity Rule are mandated for the Eligibility, Claim Status, ERA and EFT operating rules. Others may be adopted at a future date.	

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F. Eligibility and Benefits Operating Rules for Standard Transactions CAQH CORE Operating Rules for Eligibility & Benefits

Туре	Igibility & Benefits Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability
Operatin Rules	g CAQH CORE Operating Rules for Eligibility and Benefits: • <u>Data Content</u> • <u>Infrastructure</u> • <u>Single Patient</u> <u>Attribution</u>	Final	Production		Yes	Free	<u>Yes</u> ^{\$}
Limitatio	ons, Dependencies, ar eration	d Preconditio	ons for	Applicable	Security Pat	terns for	Consideration
 Ope adde Affor 	rating rules for HIPAA s ed as a requirement of t rdable Care Act of 2010 inistrative Simplificatior	he Patient Pro , under sectior	tection and	 Feedba 	ck requested.		
use requ unifo	rating rules are intender of standard transactions irements to help implen orm way between health are a more complete set	s. They may in nent the transa n plans and pro	clude certain action in a more oviders, and to				
Ope Statu refer rules ador	012 HHS adopted Phas rating Rules for the X12 us transaction standard rence at-§162.920. Som s included in the CAQH oted by HHS. Covered of rule listing the specific	Eligibility and s, which were le, but not all c CORE docum entities will find	Benefits Claim incorporated by if the operating ents were				
rule cove not r docu oper by re <u>COF</u>	O20, CAQH CORE upda structure to align with the red entities. The phase released new policies of uments or revisions. Pri rating rules for Eligibility perforence at § 162.920 a RE Mandated Operating rporated by reference a	e business pro- structure was guidance to a or versions of and Benefits nd are availab Rules website	retired. HHS has dopt the the adopted are incorporated le on the <u>CAQH</u>				
and busi desi valu	022, Tthe CAQH CORE & Benefits were update ness requirements to be gn, telehealth, and supp e-based payment initiat sed on a voluntary basi	d to align with etter support co port for the imp ives. These op	current industry omplex benefit elementation of perating rules may				



 These updates also support the identification of prior authorization requirements for services queried during eligibility verifications in real-time, at the point of care. 	
 Updated and new CORE Operating Rules for Eligibility & Benefits were recommended for Federal adoption by the National Committee of Vital Health and Statistics (NCVHS) to the Department of Health and Human Services (HHS) in June 2023. 	
 <u>Testing or certification</u> with operating rules is voluntary and available through a vendor contracted to There is a fee for certification, however, CAQH-CORE maintains free tools to support operating rule implementation. Additionally, CAQH-CORE offers educational webinars which are archived on its website. 	
 In the 2011 IFC, HHS determined that the NCPDP® standard provided enough detail and clarity to operationalize the standards to the point where no gaps existed and operating rules would not be needed to fill infrastructure or data content for its transactions (76 FR 40464). 	

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G. CAQH CORE Operating Rules for Electronic Funds Transfer (EFT) and & Electronic Remittance Advice (ERA)

Гуре	Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability
Operating Rules	CAQH CORE Operating Rules for Electronic Funds Transfer (EFT) and Electronic Remittance Advice (ERA): • EFT Enrollment Data Content • ERA Enrollment Data Content • Infrastructure • Use of CARCs and RARCs	Final	Production		Yes	Free	Yes ^{\$}
Limitation Considera	• <u>Reassociation</u> s, Dependencies, an tion	d Preconditio	ons for	Applicable	Security Patt	terns for (Consideration
 include and Aff Admini Operat use of to help betwee comple The EF combir and RA elemer In 2013 Operat 	ing rules for HIPAA s ad added as a require fordable Care Act of 2 istrative Simplification ing rules are intended the standard transact implement the transact implement the transact en health plans and plate set of information FT/ERA rules support nations for certain Cla ARCs), as well as use nts for <u>enrolling</u> provid 3, HHS adopted the F ing Rules for EFT and rence at §162.920.	• Feedba	ck requested.				

•	Prior versions of the adopted operating rules for EFT and ERA Enrollment are available on the <u>CAQH CORE</u> <u>Mandated Operating Rules website</u> and are incorporated by reference at § 162.920
-	The EFT/ERA rules support the uniform use of combinations for certain Claim and Remark Codes (<u>CARCs</u> and RARCs), as well as use of certain standard dataelements for <u>enrolling</u> providers electronically for EFT or <u>ERA</u> transactions.
•	Updated and new CORE Operating Rules for ERA were recommended for Federal adoption by the National Committee of Vital Health and Statistics (NCVHS) to the Department of Health and Human Services (HHS) in June 2023.
•	Testing, or certification with the operating rules is voluntary and available through a vendor contracted to CORE the authoring entity. There is a fee for certification, however, - CAQH CORE maintains free tools to support operating rule implementation. Additionally, CAQH CORE offers educational webinars which are archived on its website.

H. CAQH CORE Operating Rules for Health Care Claims

Туре	Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability	
Operating Rules	CAQH CORE Operating Rules for Health Care Claims: • <u>Infrastructure</u> • <u>Attachments</u> <u>Data Content</u> • <u>Attachments</u> Infrastructure	Final	Production	•••00	No	Free	<u>Yes</u> ^s	
Limitation Considera	s, Dependencies, an tion	d Preconditio	ons for	Applicable Security Patterns for Consideration				
 Operation include and Af 	ing rules for HIPAA s d added as a require fordable Care Act of 2 strative Simplification	 Feedba 	ck requested.					
use of may in	ing rules are intended standard transactions clude certain requirer ction in a more uniforr	adopted unden nents to help in						



	providers, and to ensure a more complete set of information in the response.
•	The CAQH CORE Health Care Claims Operating Rules are available for voluntary use by covered entities.
•	The CAQH CORE Health Care Claims Operating Rules are available for voluntary use by covered entities. In 2022, CAQH CORE updated this voluntary rule set to support the electronic exchange of attachments and medical information.
•	HHS has adopted operating rules for Eligibility and Benefits and Claim Status (2011), and Electronic Funds Transfer and Electronic Remittance Advice (2013).
•	HHS has not adopted Operating Rules for other HIPAA transaction standards, including Health Care Claims, Prior Authorization, Premium Billing, and Enrollment/Disenrollment.
•	The CAQH CORE Health Care Claims Operating Rules are available for voluntary use by covered entities. In 2022, CAQH CORE updated this voluntary rule set to support the electronic exchange of attachments and medical information.
-	Testing or certification with operating rules is voluntary and available through a vendor contracted to -CAQH-CORE. There is a fee for certification, however, CAQH-CORE maintains free tools to support operating rule implementation. Additionally, CAQH-CORE offers educational webinars which are archived on its website.

I. CAQH CORE Operating Rules for to Support Claim Status Transactions

Туре	Standard/ Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally Required	Cost	Test Tool Availability
Operating Rules	CAQH CORE Operating Rules for Claim Status: • Infrastructure	Final	Production	••••○	Yes	Free	Yes ^{\$}
Operation include and Af	s, Dependencies, an ation ting rules for HIPAA s ad added as a require fordable Care Act of 2 istrative Simplification	 Applicable Security Patterns for Consideration Feedback requested. 					
use of	ting rules are intended the standard transact ements to help implem						



uniform way between health plans and providers, and to ensure a more complete set of information in the response.

- In 2012 HHS adopted the Phase I and Phase II CAQH CORE Operating Rules for Eligibility and Claim Status, which were incorporated by reference at §162.920.
- In 2020, CAQH CORE updated its phase-based operating rule structure to align with the business processes supported by the rules. The phase structure was retired.
 HHS has not yet released new policies or guidance to adopt the revisions to the operating rules.
- Prior versions of the adopted operating rules are available on the <u>CAQH CORE Mandated Operating Rules website</u> and incorporated by reference at §162.920. and are available on the <u>CAQH CORE Mandated Operating Rules</u> website.
- Updated and new CORE Operating Rules for Claim Status were recommended for Federal adoption by the National Committee of Vital Health and Statistics (NCVHS) to the Department of Health and Human Services (HHS) in June 2023.
- <u>Testing</u>, or certification with the operating rules is voluntary and available through a vendor contracted to CORE theauthoring entity. There is a fee for certification, however, -<u>CAQH</u> CORE maintains <u>free tools</u> to support operating rule implementation. Additionally, <u>CAQH</u> CORE offers <u>educational webinars</u> which are archived on its website.