

Background

The CAQH CORE Board encourages healthcare stakeholders to support the simultaneous adoption of the CAQH CORE Attachment Operating Rules for Health Care Claims and Prior Authorization and attachment standards in your comments responding to the notice of proposed rulemaking (NPRM), [Administrative Simplification: Adoption of Standards for Health Care Attachments Transactions and Electronic Signatures, and Modification to Referral Certification and Authorization Transaction Standard](#).

The CAQH CORE Attachments Operating Rules establish consistent data content and infrastructure requirements that complement attachment standards. Aligning implementation of operating rules and standards enables more uniform adoption and avoids fragmented implementation and the perpetuation of costly manual workflows.

To help guide your response to the proposed rule, below are several key points that communicate the impact and benefit of concurrent adoption of operating rules with attachment standards. This is a rare opportunity to align implementation of standards and operating rules and ensure efficient use of industry resources. More details can be found [here](#). Please reach out to Erin Weber, Vice President, CAQH CORE at eweber@cagh.org to discuss these points in greater detail.

Key points

- ❖ **Value of Operating Rules:** Applied generally to all HIPAA-mandated transactions, operating rules drive more uniform adoption and conformance with the requirements of electronic standards, minimizing costs and the perpetuation of manual workflows. For example, the CAQH Eligibility and Benefits Operating Rules contributed to a 25% increase in the volume of eligibility verification transactions performed fully electronically between the time the rules were mandated in 2013 and 2021.
- ❖ **Support for Attachments Standards:** Standards supporting the electronic exchange of attachments are a “must-have” for the industry. According to the 2022 CAQH Index, only 24% of attachment transactions were carried out electronically. The lack of an attachment standard has limited adoption of the prior authorization standard as prior authorization often requires attachments.
- ❖ **Request to Align Standards & Operating Rules in Final Rule:** While the proposed rule currently only names attachment standards, HIPAA requires the adoption of both attachment standards and operating rules. Presently, the CAQH CORE Attachments Operating Rules under review by the National Committee on Vital and Health Statistics (NCVHS), a federal advisory committee to HHS, and may be recommended for federal mandate in the near future. If the NCVHS recommends the CAQH CORE Attachment Operating Rules for federal mandate, HHS should act to require the concurrent adoption of the operating rules and the named attachment standards within a two-year conformance timeline. Doing so will accelerate adoption, align implementation timelines, and strengthen interoperability.
- ❖ **Applicability of Operating Rules:** When used with the standards currently named in the proposed rule, the CAQH CORE Attachments Operating Rules establish consistent data content, infrastructure, and connectivity expectations for the payload delivery using the X12N 275 transaction. This ensures that implementers are leveraging the robust standard using consistent, uniform methods, ultimately contributing to the safe and secure transmission of clinical data contained in the transaction, including data in the HL7 C-CDA standard format.
- ❖ **Flexibility of Operating Rules to Align with Other Attachment Standards:** The CAQH CORE Attachments Operating Rules are standard agnostic and include requirements that can be applied consistently across X12 and non-X12 transactions. Therefore, the operating rules are applicable to the currently proposed attachments standards and any future rulemaking that supports the exchange of attachments using other standards – for example using the only the HL7 C-CDA, without the X12 275, or using currently

uncontemplated exchange standards, such as HL7 FHIR. In such a scenario, the uniformity facilitated by the operating rules ensures minimal disruption to workflows as industry stakeholders work to integrate new technologies into their business operations.

Thank you for considering these important points as you prepare your comments in response to the Adoption of Standards for Healthcare Attachments. If you have any questions, please do not hesitate to reach out to the CAQH CORE team.