

Subject: A Message from the Associate Director, Transactions to CAQH CORE Participants: CAQH CORE Process for the X12 v7030 Public Comment Review



COMMITTEE ON OPERATING RULES FOR INFORMATION EXCHANGE.

February 23, 2017

Dear CAQH CORE Participants,

I wanted to update you on CAQH CORE's activities relative to the X12 v7030 Public Review, which is currently underway.

Background

As you know, X12 has released a public review of the X12 v7030 TR3s. X12 initially scheduled its public review to run from September 1, 2016 through June 30, 2017, with X12 stating its intention to propose that the new versions be adopted by the Department of Health and Human Services as the next generation of X12 standards for the HIPAA transactions. X12 decided that the X12 v7030 Public Review would be conducted on a staggered calendar cycle, meaning various groupings of the 21 X12 v7030 TR3s are being issued separately. Additionally, none of the complete X12 v7030 TR3 are available for review in a PDF or Word format, rather reviewers must conduct a line-by-line review through an online tool. Overall it is a challenge that reviewers are not able to conduct a thorough end-to-end analysis. We understand and are encouraged that X12 is considering options for reviewers to have a more holistic view. Meanwhile, CAQH CORE does need to move forward with its own review.

Current Steps

CAQH CORE is undertaking several actions with regard to this X12 activity. All of these actions are focused on industry value, clarity, and alignment of efforts that relate to the CORE [mission and vision](#). Any potential public communication that CAQH CORE may take will be fully vetted with the CAQH CORE Participating Organizations.

Existing strategic drivers and guiding principles of CAQH CORE are being used to guide an initial review of the X12 v7030 TR3s. This review will focus in three areas: business drivers for adoption of a new version of the standard, data content, and maintenance processes. The strategic drivers and guiding principles that will be considered during the review include CORE's:

- Role as the HHS-designated operating rule authoring entity;
- Commitment to ensure that the operating rules do not repeat and/or conflict with what is a requirement of a standard;
- Strategic stance that existing data content requirements of operating rules that require the market to support further use of existing version of the standard should roll into future

mandated version of the standards; such a cycle is critical to gain full value of existing industry assets in use by market implementers;

- Commitment to ensure that maintenance processes are thorough, represent the diverse stakeholders in our industry, and capture real world usage data;
- Consideration of lessons learned, value, and whether improved efficiencies are gained to ensure return on investment (ROI) for the industry;
- Future focus on balancing needs of fee-for-service and evolving payments models.

Details on the three main areas of review are:

1. **Business Drivers for Adoption of New Version of Standard:** As required by the [CAQH CORE Integrated Model](#), CAQH CORE continuously assesses the impact of the operating rules on industry stakeholders to ensure that they meet evolving business needs, build efficiencies, and drive value. As the industry considers the X12 v7030 TR3s through the X12 v7030 Public Review process, these same tenets will be considered as we assess the potential of migrating to a new version of HIPAA mandated transactions.
2. **Review of Data Content:** The mandated Phase I and II CAQH CORE Operating Rules addressing the currently mandated X12 v5010 270/271 eligibility transactions include requirements for the delivery, receipt and display of critically needed data content by requiring the use of non-mandated aspects of the X12 standard. The ability of the operating rules as defined by law to further promote use of recognized standards is a key way healthcare can build on its existing assets to ensure full value of implementations. As the TR3s for these transactions are included in the X12 v7030 review, CAQH CORE staff will conduct an initial assessment of the data content requirements and evaluate for potential impacts; such as, are data content from operating rules proposed for mandate in v7030 as intended and what additional content is required. We anticipated the review for the X12 v5010 270/271 TR3 to occur in March; however, X12's issued schedule is under further adjustment so the TR3 may not be available in March. CAQH CORE staff will summarize draft findings and share substantive feedback with the CORE Participants for its input prior to and deadlines for submission of comments.
3. **CAQH CORE Maintenance Processes:** CAQH CORE developed and conducts various maintenance processes for the operating rules, from regular updates to revising the CAQH CORE Code Combinations. Therefore, CAQH CORE is particularly sensitive to maintenance processes of codes sets, data content, etc. not only as the author of operating rules, but more importantly to the impact such maintenance has to implementers. As part of our review of the X12 v7030 TR3s, we will evaluate areas in the TR3 that are proposing new or different maintenance activities to understand the processes, references and how they will align with each other and existing efforts.

Please do let us know if you have questions on any of the CAQH CORE guiding principles or strategic drivers and their relation to the CAQH CORE review of the X12 v7030 TR3s.

Next Steps

Due to this structural approach established by X12 to review the v7030 TR3s, CAQH CORE will need to have a multi-stepped review. Should a holistic view of the TR3 become available, the process will adjust accordingly. Meanwhile, staff will collaborate with the CORE Participants on a periodic basis through email communications and then CORE-only Participant calls. **CAQH CORE plans on hosting the first CORE participant-only call specifically on this topic in May to hear feedback from participants on this approach and to discuss status of initial reviews and findings.** We will work with CORE Work Group Chairs and volunteer participants prior to full participant outreach. Additionally, the CORE Board will consider the overall combined impact of the various X12 v7030 TR3s and thus the strategic review of the full v7030. We look forward to working with you throughout this process to identify CORE input.

Your organization's continued leadership and engagement are critical.

If you have any questions about this or any other CAQH CORE initiative, please contact us at CORE@caqh.org or reach out at the phone number below.

Best,
Bob

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