



---

**Analysis & Planning Guide for Implementing the  
CAQH CORE Benefit Enrollment Operating Rules**

**May 2020**

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

**Table of Contents**

<b>1. Introduction: Analysis &amp; Planning for CAQH CORE Benefit Enrollment Operating Rule Implementation.....</b>	<b>3</b>
<b>2. Systems Development Life Cycle .....</b>	<b>4</b>
<b>3. Analysis &amp; Planning for the Benefit Enrollment CAQH CORE Operating Rules: Key Tasks .....</b>	<b>5</b>
<b>4. Additional Resources.....</b>	<b>8</b>
<b>5. Appendix .....</b>	<b>9</b>

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

**1. Introduction: Analysis & Planning for CAQH CORE Benefit Enrollment Operating Rule Implementation**

This CAQH CORE Benefit Enrollment Analysis & Planning Guide is a resource for entities preparing to implement the CAQH CORE Benefit Enrollment Operating Rules. A solid understanding of the CAQH CORE Benefit Enrollment Operating Rules, combined with an effective planning effort, is the basis for a successful implementation project.

This document provides guidance for project managers, business analysts, system analysts, architects, and other project staff to complete the first step of a typical systems development life cycle: Systems Analysis & Planning. The purpose of this guide is to enable project managers and other staff to:

- Understand the applicability of the CAQH CORE Benefit Enrollment Operating Rules requirements to your organization's systems and business processes that support the ASC X12N/005010X220 Benefit and Enrollment Maintenance (834) and associated errata (hereafter referenced as ASC X12N v5010 834)
- Identify and inventory all impacted internal systems, business processes (manual and automated) and functions/processes outsourced to an agent<sup>1</sup> (e.g., Business Associate) that process the transactions or perform other requirements of the CAQH CORE Benefit Enrollment Operating Rules
- Perform a detailed rule requirements gap analysis to identify system(s) that may require remediation in order to conform to the CAQH CORE Benefit Enrollment Operating Rule requirements and to identify business processes which may be impacted by the CAQH CORE Benefit Enrollment Operating Rules (e.g., need for internal testing, project management, additional resources, etc.)

The appendices of this Analysis & Planning Guide include the following:

- [Stakeholder & Business Type Evaluation](#): Use to determine your stakeholder type(s) and understand the role of your agents (Business Associates) that process the transactions and will be affected by connectivity requirements
- [Systems Inventory & Impact Assessment Worksheet](#): Use to perform a high-level inventory of all internal systems, business processes (manual and automated) and functions/processes outsourced to an agent that process the transactions and are impacted by the CAQH CORE Benefit Enrollment Operating Rules
- [Gap Analysis Worksheet](#): Use to determine the level of system(s) remediation necessary for implementing the business requirements of the CAQH CORE Health Care Claims Operating Rules
- [Stakeholder Transaction Flow Diagrams](#): An overview of the stakeholders involved in the Benefit Enrollment transaction

**NOTES:**

- This document is for educational purposes only. In the case of a question between this document and CAQH CORE Operating Rule text or Federal regulations, the latter takes precedence.
- This Analysis & Planning Guide is scoped to general implementation planning of the CAQH CORE Benefit Enrollment Operating Rules and can assist with compliance with a potential Federal Regulation pursuant to ACA Section 1104 or CORE Certification; these are, however, separate projects requiring analysis and planning beyond that described in this document.<sup>2</sup>
- The CAQH CORE Operating Rules reference three stakeholder categories: HIPAA-covered Provider or its agent; HIPAA-covered Health Plan or its agent; HIPAA-covered Entity or its agent. This document references examples of these stakeholder categories to assist with applicability and implementation;

---

<sup>1</sup> One who agrees and is authorized to act on behalf of another, a principal, to legally bind an individual in particular business transactions with third parties pursuant to an agency relationship. Source: West's Encyclopedia of American Law, edition 2. Copyright 2008 The Gale Group, Inc. All rights reserved. The term "agent" as used in this document describes entities that provide outsourced functions/activities on behalf of HIPAA-covered health plans or providers, (e.g., Business Associate). The full definition of Business Associate can be found in the [Electronic Code of Federal Regulations](#) (Title 45, Subtitle A, Subchapter C, Part 160.103).

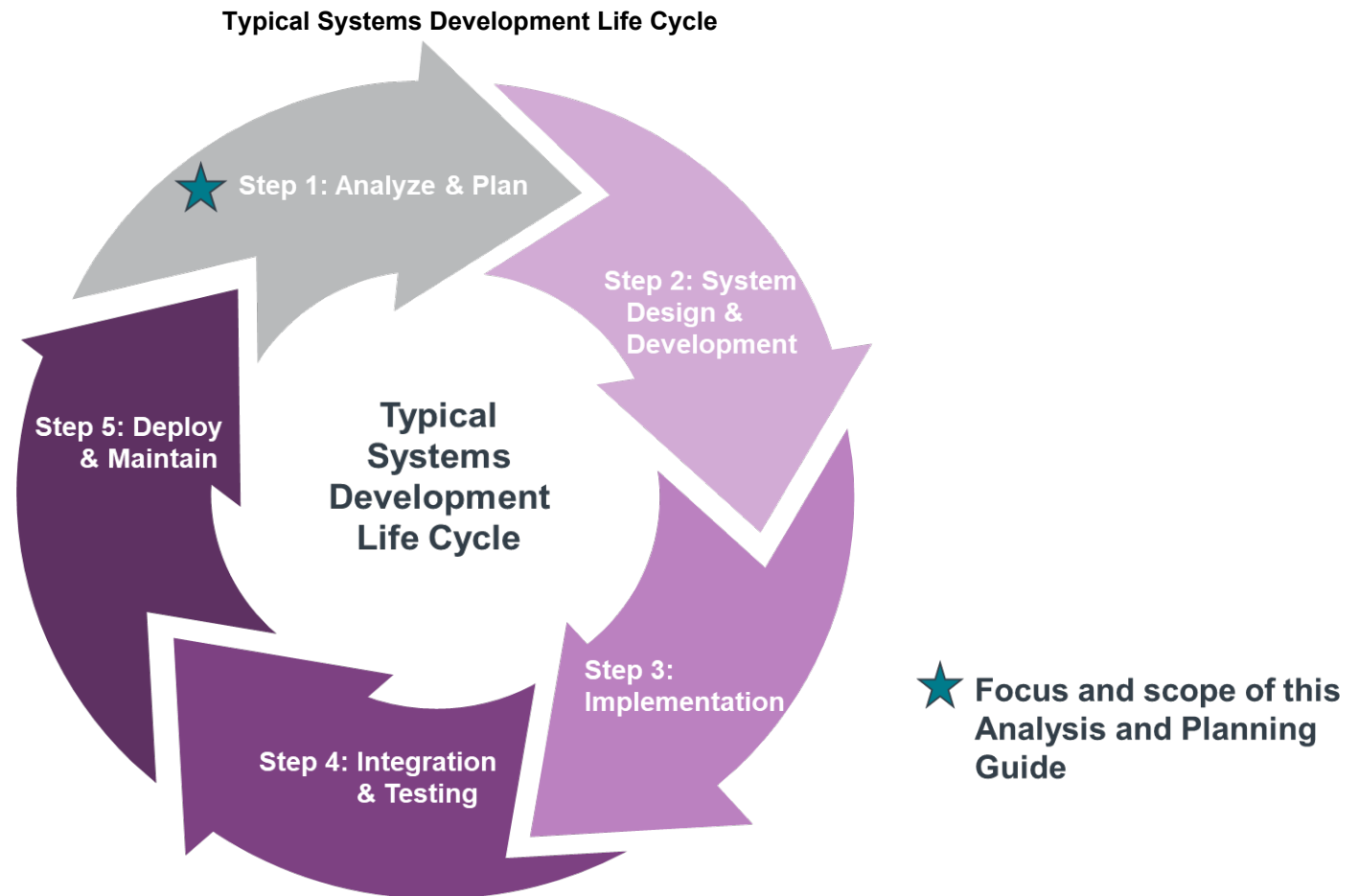
<sup>2</sup> The CAQH CORE Benefit Enrollment Operating Rules have not been mandated by HHS at the time of publishing of this guide.

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

these examples include clearinghouses and vendors. Please note that some stakeholder types are not necessarily a HIPAA-covered entity. Some stakeholders (e.g., software or service vendors) may not be directly required to implement the rule requirements, but may need to as a result of being an agent of a HIPAA-covered entity.

**2. Systems Development Life Cycle**

The diagram below illustrates a typical systems development life cycle (SDLC) for developing or remediating information systems. SDLC includes five key steps, beginning with analysis and planning through deployment and ongoing maintenance. This Analysis & Planning Guide is scoped to assist your organization in the first step of an SDLC for the implementation of the CAQH CORE Benefit Enrollment Operating Rules given Step 1 sets the stage for all other steps. Note: The impacted system(s) may include an in-house developed system, commercial off the shelf (COTS)/cloud-based system, or a solution outsourced to a third party. The “system” in certain cases may also be a manual process or even include activities performed on your behalf by one or more agents.



**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

**3. Analysis & Planning for the Benefit Enrollment CAQH CORE Operating Rules: Key Tasks**

The following table outlines the key tasks necessary to complete Step 1: Analyze & Plan of a Systems Development Life Cycle. When the analysis and planning is completed, you will have created a high-level systems impact analysis and developed a detailed project plan for adopting the CAQH CORE Benefit Enrollment Operating Rules requirements.

Analysis and Planning: Key Tasks	
Task	Activity
<b>Task A – Complete Staff Education and Training on the CAQH CORE Benefit Enrollment Operating Rules</b>	<ul style="list-style-type: none"> <li>Thoroughly review and understand the <a href="#">CAQH CORE Benefit Enrollment Operating Rules</a></li> <li>Conduct general education and awareness of the CAQH CORE Benefit Enrollment Operating Rules for the impacted areas in your organization (see Section 4 of this document for additional resources available to educate staff on the CAQH CORE Operating Rules)</li> </ul>
<p><b>Task B – Determine Your Organization’s Stakeholder &amp; Business Type(s) (<a href="#">Stakeholder &amp; Business Type Evaluation</a>)</b></p> <p><i>CAQH CORE Benefit Enrollment Operating Rule requirements are tied to applicable stakeholder type(s): HIPAA-covered provider, HIPAA-covered health plan, a HIPAA-covered entity, or their respective agents.</i></p> <p><i>Please note that some stakeholder types that are part of the entities involved in exchanging the Benefit Enrollment transaction are not necessarily a HIPAA-covered entity. Some stakeholders (software or service vendors) may not be directly required to implement the rule requirements, but may need to as a result of being an agent of a HIPAA-covered entity.</i></p>	<ul style="list-style-type: none"> <li>Determine your stakeholder and business type(s) to understand which CAQH CORE Benefit Enrollment Operating Rules apply to your organization</li> <li>Understand the role of agents that provide services or process the transactions on your behalf</li> <li>Consider the following based on your stakeholder type(s): <ul style="list-style-type: none"> <li>If your organization is a health plan that receives ASC X12N v5010 834: <ul style="list-style-type: none"> <li>The majority of the CAQH CORE Benefit Enrollment Operating Rule requirements will apply to you.</li> <li>Health plans that outsource a portion or all of the CAQH CORE Benefit Enrollment Operating Rules requirements to an agent to process may have some unique implementation considerations. Depending on the scenario between the health plan and its agent(s), the health plan may not need to implement some rule requirements directly while the agent will need to implement them on behalf of the health plan. For other transactions, agents may include other types of entities not involved in the implementation of the existing ACA-mandated CAQH CORE Operating Rules and the CAQH CORE Benefit Enrollment Operating Rules. The health plan, therefore, might have a different agent(s) to consider when implementing the Benefit Enrollment CAQH CORE Operating Rules. (See <a href="#">Appendix D</a> for a diagram of potential stakeholders involved in the transactions addressed in the CAQH CORE Benefit Enrollment Operating Rules that may assist with identifying all entities involved.)</li> </ul> </li> <li>If your organization is an <u>employer</u>: <ul style="list-style-type: none"> <li>You likely are outsourcing some of the CAQH CORE Benefit Enrollment Operating Rule requirements to an agent. Employer organizations using a clearinghouse, a software vendor, or a third-party billing/collection service to process the transactions with health plans may have some unique implementation considerations, as the clearinghouse/software vendor/billing/collection services is performing some functions on behalf of the employer as an agent.</li> </ul> </li> </ul> </li> </ul>

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

Analysis and Planning: Key Tasks	
Task	Activity
	<ul style="list-style-type: none"> <li>• If your organization is a <u>clearinghouse</u>:               <ul style="list-style-type: none"> <li>– If a health plan and/or employer outsource(s) certain functions to you to perform on their behalf, you are responsible for implementing all CAQH Benefit Enrollment Operating Rule requirements which have been outsourced to you. In this scenario, your organization will need to work with your business partners to determine applicable rule requirements.</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• If your organization is a <u>software or services vendor</u>:               <ul style="list-style-type: none"> <li>– You may be responsible for incorporating many of the CAQH CORE Benefit Enrollment Operating Rule requirements into your services or software as a result of providing software or services solutions to a HIPAA-covered entity even though you are not considered an agent of a HIPAA-covered entity. A review of the CAQH CORE Benefit Enrollment Certification Test Suite Section 2.2.4 may provide some insight.</li> <li>– Note: If your services or software are employer-facing, you will have a unique set of requirements to implement that are different than health plan-facing services or software.</li> </ul> </li> </ul>
<b>Task C – Conduct a Systems Inventory (<a href="#">Systems Inventory &amp; Impact Assessment Worksheet</a>)</b>	<p><i>Relative to your stakeholder type(s):</i></p> <ul style="list-style-type: none"> <li>• Identify and inventory all impacted internal systems, business processes (manual and automated) and functions/processes outsourced to an agent that processes the transactions</li> <li>• Determine which functions for each identified impacted system and business process are in-house developed and maintained, commercial-off-the-shelf (COTS)/cloud-based system, or outsourced to an agent</li> <li>• Determine potential options for addressing the CAQH CORE Benefit Enrollment Operating Rule requirements applicable to your stakeholder type(s) (e.g., remediate an in-house developed system, replace or upgrade any COTS/cloud-based system, or work with the vendor to ensure they meet CAQH CORE Benefit Enrollment Operating Rule requirements)</li> </ul>
<b>Task D – Conduct Detailed Rule Requirements Gap Analysis (<a href="#">Gap Analysis Worksheet</a>)</b>	<ul style="list-style-type: none"> <li>• Identify the impacted systems (identified via the <i>Systems Inventory &amp; Impact Assessment Worksheet</i>) responsible for satisfying each requirement of the CAQH CORE Benefit Enrollment Operating Rules</li> <li>• Identify and document any gaps between the existing system’s capability and each rule requirement</li> <li>• Identify and document any business process which may also be impacted by each CAQH CORE Benefit Enrollment Operating Rule requirement and to what extent the process is impacted</li> </ul>

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

Analysis and Planning: Key Tasks	
Task	Activity
<b>Task E – Develop a Detailed Project Plan</b>	<ul style="list-style-type: none"> <li>• A detailed project plan typically outlines steps for completion of the following key activities as Steps 2-5 of the System Development Life Cycle:               <ul style="list-style-type: none"> <li>- Determine required resources to complete the project (i.e., estimate resources, time, system release schedules, and money)</li> <li>- Develop a detailed Functional Requirements Document</li> <li>- Create a detailed Systems Design Document describing, in detail, the required functions and capabilities necessary to implement the CAQH CORE Benefit Enrollment Operating Rules</li> <li>- Implement necessary system(s) enhancements</li> <li>- Test impacted systems to ensure conformance to the requirements set forth in the Functional Requirements Document</li> <li>- Deploy (i.e., implement system(s) into production environment)</li> <li>- Conduct trading partners implementation testing</li> </ul> </li> </ul>
<b>Other Considerations – CORE Certification</b>	<ul style="list-style-type: none"> <li>• Consider CORE Certification as part of your project plan<sup>3</sup> <ul style="list-style-type: none"> <li>- CAQH CORE offers <a href="#">CORE Certification</a> to the four stakeholder types that create, transmit or use the transactions: health plans, providers, software/services vendors, and clearinghouses.</li> <li>- Key benefits to completing CORE Certification include:               <ul style="list-style-type: none"> <li>▪ Certification testing provides an online mechanism for a stakeholder to test its system’s ability to exchange eligibility and claim status data with its trading partners using the CAQH CORE Benefit Enrollment Operating Rules</li> <li>▪ Demonstrates via a recognized industry “Seal” your organization’s adoption of the CAQH CORE Benefit Enrollment Operating Rules to the industry</li> <li>▪ Encourages trading partners to work together on transaction data content, infrastructure and connectivity needs</li> <li>▪ Promotes maximum ROI when all stakeholders in the information exchange are known to conform with the CAQH CORE Benefit Enrollment Operating Rules</li> </ul> </li> </ul> </li> <li>• More information on the CORE Certification process is available on the CAQH website <a href="#">HERE</a>.</li> </ul>

<sup>3</sup> **NOTE:** A CORE Certification Program is offered by CAQH CORE. Information on any regulatory action that CMS may issue regarding the health plan certification required by the ACA would be outlined by Federal regulation. Information on the CMS compliance program regarding standards and operating rules is under development and can be found [HERE](#).

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

#### **4. Additional Resources**

Beyond the information provided in this CAQH CORE Analysis & Planning Guide, there are additional resources for entities preparing to implement the CAQH CORE Benefit Enrollment Operating Rules:

- [CAQH CORE Benefit Enrollment Operating Rules](#)
- [Operating Rules Implementation Resources](#) from CAQH CORE and its partners to help you implement the CAQH CORE Operating Rules (developed for CORE Certification but same concepts, e.g., role of trading partners, apply for general adoption of the CAQH CORE Operating Rules)
- [CAQH CORE FAQs](#) address typical questions regarding the CAQH CORE Operating Rules
  - If your question is not answered by the FAQ, email question to [CORE@caqh.org](mailto:CORE@caqh.org) to have it entered into the formal CAQH CORE Request Process
- Upcoming CAQH CORE [Education Sessions](#) (as well as presentations and recordings from previous sessions) for further clarification on rule requirements
- [CMS Administrative Simplification/Affordable Care Act FAQs](#) (FAQs on a wide range of other topics, as well)
- [ASC X12 Interpretation Portal](#) Information related to the meaning, use, and interpretation of ASC X12 Standards, Guidelines, and Technical Reports, including implementation guidelines for the transactions can be obtained from ASC X12.

Entities seeking to implement the CAQH CORE Benefit Enrollment Operating Rules are encouraged to note the following:

- The CAQH CORE Benefit Enrollment Operating Rules assume that any HIPAA-covered entity implementing the operating rules is compliant with HIPAA; HIPAA compliance is not defined by CAQH CORE.
- The CAQH CORE Benefit Enrollment Operating Rule requirements are specific to either a HIPAA-covered entity or its respective agent(s). The applicability of a specific CAQH CORE Benefit Enrollment Operating Rule requirement may vary according to trading partner relationship, contracted services, and other arrangements. If you have specific questions concerning applicability, please [contact CAQH CORE Staff](#).
- CAQH CORE staff is available to assist with questions about understanding the requirements of the CAQH CORE Benefit Enrollment Operating Rules in regard to your stakeholder type(s); gap analysis and systems remediation are the responsibility of the implementing entities.



**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

## 5. Appendix

### Appendix A: CAQH CORE Stakeholder & Business Type Evaluation

**Purpose:** After becoming educated on the CAQH CORE Benefit Enrollment Operating Rules, you will need to determine your stakeholder type(s). The *CAQH CORE Benefit Enrollment Stakeholder & Business Type Evaluation* below will assist you in determining which CAQH CORE Benefit Enrollment Operating Rules apply to your organization and to generally consider which trading partners you need to work with on planning and implementation. Knowing your stakeholder type(s) will help you complete the *Systems Inventory & Assessment Worksheet*.

**NOTE:** Applicability of a specific rule requirement may vary according to trading partner relationship, contracted services, and other arrangements.<sup>4</sup> Some example business models include:

- Employer direct-to-Health plan connection:
  - Health plan implements all requirements of the CAQH CORE Benefit Enrollment Rule Set
  - Employer receives and processes acknowledgements as required by the CAQH CORE Benefit Enrollment Rules
- Health plan-to-agent connection:
  - Health plan outsources the return or elements of X12N v5010 834 to an agent (e.g., business associate or third party administrator)
  - Health plan agent acts as a proxy for health plan's CAQH CORE Benefit Enrollment conformance for the contracted services
- Single/dual clearinghouse-to-health plan connection:
  - Health plan outsources infrastructure and connectivity functions to a clearinghouse
  - Health plan-facing clearinghouse acts as a proxy for health plan's CAQH CORE Benefit Enrollment conformance for the contracted services

**Key Takeaway:** Understand what aspects of your business and/or outsourced functions are impacted by the CAQH CORE Benefit Enrollment Operating Rules (e.g. products, business lines, etc.).

---

<sup>4</sup> The CAQH CORE Benefit Enrollment Operating Rule Set requirements are tied to applicable stakeholder type(s): HIPAA-covered provider, HIPAA-covered health plan, a HIPAA-covered entity, or their respective agents. This document references examples of these stakeholder categories to assist with applicability and implementation. Please note that some stakeholder types that are part of the entities involved in exchanging the Benefit Enrollment transaction are not necessarily a HIPAA-covered entity. Some stakeholders (software or service vendors) may not be directly required to implement the rule requirements, but may need to as a result of being an agent of a HIPAA-covered entity.

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

<b>Stakeholder &amp; Business Type Evaluation</b>		
<b>Question</b>	<b>Points for Consideration</b>	<b>Your Response</b>
1. What is your stakeholder type(s)? (e.g., health plan, provider, employer, vendor, clearinghouse; see question 3 for more information on other trading partners)	The <a href="#">Benefit Enrollment CAQH CORE Certification Test Suite</a> defines four stakeholder types that implement the operating rules: health plan, clearinghouse, provider, and vendor; the applicability of specific CAQH CORE Benefit Enrollment Operating Rule requirements vary according to stakeholder type. Please reference Section 2 of the Benefit Enrollment CAQH CORE Certification Test Suite for further information.	
2. What role and responsibilities does my organization have for implementing the CAQH CORE Benefit Enrollment Operating Rules, given our stakeholder type(s)	The CAQH CORE Benefit Enrollment Operating Rules outline the specific roles and responsibilities for each stakeholder type; review CAQH CORE Benefit Enrollment Operating Rule text for more detail.	
3. Does my organization rely on other organizations (e.g., software vendors, clearinghouses, business associates) to assist with ASC X12N v5010 834 processing?	<p>The applicability of a specific CAQH CORE Benefit Enrollment Operating Rule requirements may vary according to trading partner relationship, contracted services, and other arrangements. If your organization relies on a software vendor or a clearinghouse or other business associate to meet any of the CAQH CORE Benefit Enrollment Operating Rule requirements, you will need to coordinate with that entity as part of your pre-implementation planning and outline applicability of each requirement to the vendor, clearinghouse or business associate. See Section 4 of this document (above) for additional resources.</p> <p>Ensure appropriate business associate agreements are in place with necessary stakeholders</p>	

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

**Appendix B: CAQH CORE Systems Inventory & Impact Assessment Worksheet**

**Purpose:** After you complete the *Stakeholder & Business Type Evaluation*, your next step is to complete the *CAQH CORE Systems Inventory & Impact Assessment Worksheet* which enables you to identify and inventory all impacted systems that process the 824 transaction.

This assessment worksheet will help you identify your systems impacted by the implementation of the CAQH CORE Benefit Enrollment Operating Rules, including in-house developed and maintained systems, COTS/cloud-based systems, and those functions outsourced to a third party. While completing this analysis you should also consider potential options for addressing applicable CAQH CORE Benefit Enrollment Operating Rule requirements (e.g., remediate an in-house developed system, replace or upgrade any COTS/cloud-based system, or work with third-party vendor).

**Instructions:**

1. In the second column of the worksheet, note if one of your system(s) is impacted by each rule and list the name of the impacted system(s).
  - **NOTE:** The impacted system(s) may include an in-house developed system, COTS/cloud-based system, or a capability outsourced to a third party. The “system” in certain cases may also be a manual process.
2. In the third column, identify potential options for addressing the rule requirements for each impacted system(s).
3. Use the worksheet findings to inform completion of the *Gap Analysis Worksheet* for any identified system impacted by the rule requirements.

**Key Takeaway:** Understand how many of your systems/products are impacted by each CAQH CORE Benefit Enrollment Operating Rule and understand with which vendors you will need to coordinate.

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

<b>CAQH CORE Systems Inventory &amp; Impact Assessment Worksheet</b>			
<b>CAQH CORE Operating Rule</b>	<b>Are One or More Systems/Processes Impacted?</b> <i>(Yes/No; Name of Impacted System/Process)</i>	<b>Is the System/Process In-House, COTS/Cloud-based, or Outsourced to a Third Party?</b>	<b>Potential Options to Address Rule Requirements</b> <i>(e.g. remediate an in-house developed system, replace or upgrade any COTS/cloud-based system, work with third party vendor to ensure they meet CAQH CORE Operating Rule requirements, or update manual processes)</i>
<b>Infrastructure Rule</b>			
CAQH CORE <a href="#">Benefit Enrollment (834) Infrastructure Rule vBE.1.0</a> (ability to support 5010X220 834 processing)			
CAQH CORE <a href="#">Connectivity Rule vC3.1.0</a> (ability to support updated Connectivity Rule; please also refer to the <a href="#">CAQH CORE-Required Processing Mode and Payload Type Tables</a> )			

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

**Appendix C: CAQH CORE Gap Analysis Worksheet**

**Purpose:** After the *Systems Inventory & Impact Assessment*, the next task is for entities to determine the level of system(s) remediation necessary for adopting the business and technical requirements of the CAQH CORE Benefit Enrollment Operating Rules using the *CAQH CORE Gap Analysis Worksheet*. Each rule requirement in the *Gap Analysis Worksheet* includes a section reference for the corresponding operating rule for more detail.

**NOTES:**

- For more detail on rule requirements refer to the actual CAQH CORE Operating Rule text which takes precedence over this worksheet.
- If your entity has identified more than one impacted system you may need to complete a *Gap Analysis Worksheet* for each system.

**Instructions:**

1. The *Gap Analysis Worksheet* contains each CAQH CORE Operating Rule Requirement in the first column by CAQH CORE Benefit Enrollment Operating Rule. In the second column, enter the system(s) impacted by the CAQH CORE Benefit Enrollment Operating Rule Requirement. If there is no system impacted by the requirement, enter N/A.
  - **NOTE:** The impacted system(s) may include an in-house developed system, a COTS/cloud-based system, or a capability outsourced to a third party or business associate.
2. In the third column note if the system currently meets the CAQH CORE Benefit Enrollment Operating Rule Requirement or not.
3. In the fourth column, briefly describe any gap between the CAQH CORE Benefit Enrollment Operating Rule Requirement and the system under evaluation, if applicable. The high level findings from the *Systems Inventory & Impact Assessment* will inform the input in this column.
4. In the fifth column estimate the effort required to remediate the impacted system(s). This can include the type of skilled resource required, the number of such resources, and the potential hours required to fill the gap identified.
5. In the sixth column identify and describe any impacted business process. These often include potential training and education of staff, clients, and other users of the system's new capabilities.
6. In the seventh column estimate and describe the effort required to revise the impacted business process. This can include the type of skilled resources required, the number of such resources, and the potential hours required to fill the gap identified.
7. The results of the completed *Gap Analysis Worksheet* will allow for the development of a detailed project plan.

**Key Takeaway:** Understand the level of system(s) remediation necessary for adopting each CAQH CORE Benefit Enrollment Operating Rule requirement.

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

<b>Rule Req. #</b>	<b>CAQH CORE Operating Rule Requirement</b>	<b>System/Process Impacted</b> <i>(Based on results from System Inventory and Impact Analysis Worksheet; if no impact enter N/A)</i>	<b>System/Process Currently Meets the Requirement</b> <i>(Yes/No)</i>	<b>Gap</b> <i>(Briefly describe gap)</i>	<b>Estimated System/Process Remediation Effort</b> <i>(Required number, type of skilled resource, person hours required)</i>	<b>Business Processes Impacted</b> <i>(Briefly describe)</i>	<b>Business Processes/Documentation Revisions Required &amp; Effort Estimates</b>
<b><u>CAQH CORE Benefit Enrollment (834) Infrastructure Rule vBE.1.0</u></b>							
<i>Processing Mode Requirements (§4.1)</i>							
<b>1</b>	Health plan must support server requirements for Batch processing mode.						
<b>2</b>	Health plan may optionally also support server requirements for Real Time processing mode.						
<i>Connectivity Requirements (§4.2)</i>							
<b>3</b>	A HIPAA-covered entity must be able to support the CAQH CORE Connectivity Rule vC3.1.0.						
<i>System Availability Requirements (§4.3.1)</i>							
<b>4</b>	Publication of regularly scheduled downtime, including holidays and method(s) for such publication.						
<b>5</b>	Publication of non-routine downtime notice and method(s) for such publication.						
<b>6</b>	Publication of unscheduled/emergency downtime notice and method(s) for such publication.						
<i>Real Time Processing Mode Response Time Requirements (§4.4)</i>							
<b>7</b>	Support maximum response time requirement (receipt of a 5010X231 999 transaction within 20 seconds of submitting a 5010X220 834 when processing in Real Time Processing Mode) to ensure that least 90 percent of required responses are returned within specified maximum response time as measured within a calendar month.						
<i>Real Time Acknowledgement Requirements (§4.5)</i>							
<b>8</b>	A 5010X231 999 is returned on an ASC X12 Functional Group of 5010X220 834 that has been accepted, accepted with errors, or rejected.						

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

<b>Rule Req. #</b>	<b>CAQH CORE Operating Rule Requirement</b>	<b>System/Process Impacted</b> <i>(Based on results from System Inventory and Impact Analysis Worksheet; if no impact enter N/A)</i>	<b>System/Process Currently Meets the Requirement</b> <i>(Yes/No)</i>	<b>Gap</b> <i>(Briefly describe gap)</i>	<b>Estimated System/Process Remediation Effort</b> <i>(Required number, type of skilled resource, person hours required)</i>	<b>Business Processes Impacted</b> <i>(Briefly describe)</i>	<b>Business Processes/Documentation Revisions Required &amp; Effort Estimates</b>
<i>Batch Processing Mode Response Time Requirements (§4.6)</i>							
<b>9</b>	Support maximum response time requirement (receipt of a 5010X231 999 transaction by 7 am ET if a 5010X220 834 was submitted by 9 pm ET three business days prior when processing in Batch Processing Mode) to ensure that least 90 percent of required responses are returned within specified maximum response time as measured within a calendar month.						
<i>Batch Acknowledgement Requirements (§4.7)</i>							
<b>10</b>	A 5010X231 999 is returned on an ASC X12 Functional Group of 5010X220 834 that has been accepted, accepted with errors, or rejected.						
<i>Elapsed Time for Enrollment System Processing of Received Benefit Enrollment Data (§4.8)</i>							
<b>11</b>	A HIPAA-covered health plan or its agent must process the benefit enrollment and maintenance data by its enrollment application system within five business days following the successful receipt and validation of the data as defined in the rule.						
<i>Companion Guide Requirements (§4.9)</i>							
<b>12</b>	Companion guide conforms to the flow and format of the CORE v5010 Master Companion Guide Template.						
<b>13</b>	Companion guide conforms to the format for presenting each segment, data element and code flow and format of the CORE v5010 Master Companion Guide Template.						

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

<b>Rule Req. #</b>	<b>CAQH CORE Operating Rule Requirement</b>	<b>System/Process Impacted</b> <i>(Based on results from System Inventory and Impact Analysis Worksheet; if no impact enter N/A)</i>	<b>System/Process Currently Meets the Requirement</b> <i>(Yes/No)</i>	<b>Gap</b> <i>(Briefly describe gap)</i>	<b>Estimated System/Process Remediation Effort</b> <i>(Required number, type of skilled resource, person hours required)</i>	<b>Business Processes Impacted</b> <i>(Briefly describe)</i>	<b>Business Processes/Documentation Revisions Required &amp; Effort Estimates</b>
<b><u>CAQH CORE Connectivity Rule vC3.1.0</u></b>							
<i>Message Envelope Requirement (§4.1.1)</i>							
<b>1</b>	Requires the use of SOAP+WSDL.						
<i>Submitter Authentication Requirement (§4.1.2)</i>							
<b>2</b>	Requires the use of X.509 Client Authentication (mutual authentication) over SSL 3.0 or TLS 1.1 or higher.						
<i>Real Time and Batch Payload Attachment Handling (§4.1.4)</i>							
<b>3</b>	Payload must be sent as an MTOM encapsulated object.						
<i>Required Transport Method (§4.2.1)</i>							
<b>4</b>	HIPAA-covered entities or their agents must implement HTTP/S Version 1.1 over the public Internet.						
<b>5</b>	Receivers must perform the role of an HTTP/S server; Senders must perform the role of an HTTP/S client.						
<b>6</b>	All information exchanged between the client and server is encrypted by a session-level private key negotiated at connection time.						
<i>Real Time Requests (§4.2.3)</i>							
<b>7</b>	Real Time requests must include a single inquiry or submission as specified in the transaction's corresponding CAQH CORE Benefit Enrollment Infrastructure Rule.						
<i>Batch Submission (§4.2.4)</i>							
<b>8</b>	Batch requests are sent in the same way as Real Time requests.						
<b>9</b>	Response must be only the standard HTTP message indicating whether the request was accepted or rejected.						
<b>10</b>	Message receivers must not respond to a batch submission with an ASC X12 response such as a 5010						



**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

<b>Rule Req. #</b>	<b>CAQH CORE Operating Rule Requirement</b>	<b>System/Process Impacted</b> <i>(Based on results from System Inventory and Impact Analysis Worksheet; if no impact enter N/A)</i>	<b>System/Process Currently Meets the Requirement</b> <i>(Yes/No)</i>	<b>Gap</b> <i>(Briefly describe gap)</i>	<b>Estimated System/Process Remediation Effort</b> <i>(Required number, type of skilled resource, person hours required)</i>	<b>Business Processes Impacted</b> <i>(Briefly describe)</i>	<b>Business Processes/Documentation Revisions Required &amp; Effort Estimates</b>
	X12 999 in the HTTP response to the batch request, even if their systems' capabilities allow such a response.						
<b>11</b>	All ASC X12 responses must be available for pick up by the message sender (client) in accordance with the respective Phase IV CAQH CORE Infrastructure Rule for the transaction.						
	<i>Batch Response Pickup (§4.2.5)</i>						
<b>12</b>	Batch responses must be picked up after the message receiver has had a chance to process a Batch submission in the timeframes specified in the transaction's corresponding CAQH CORE Benefit Enrollment Infrastructure Rule.						
	<i>Error Handling (§4.2.6)</i>						
<b>13</b>	The appropriate HTTP error or status codes and SOAP Faults as applicable to the error/status situation must be used.						
	<i>Tracking of Date and Time and Payload ID (§4.2.8)</i>						
<b>14</b>	Servers are required to track the times of any received inbound messages, and respond with the outbound message for that Payload ID.						
<b>15</b>	Clients must include the date and time the message was sent in the CORE metadata element Time Stamp.						
	<i>Capacity Plan (§4.2.9.1, §4.2.9.2)</i>						
<b>16</b>	A HIPAA-covered entity or its agent's messaging system must have a capacity plan such that it can receive and process a large number of single concurrent Real Time transactions via an equivalent number of concurrent connections which must be received, processed and the appropriate response provided within response time						

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

<b>Rule Req. #</b>	<b>CAQH CORE Operating Rule Requirement</b>	<b>System/Process Impacted</b> <i>(Based on results from System Inventory and Impact Analysis Worksheet; if no impact enter N/A)</i>	<b>System/Process Currently Meets the Requirement</b> <i>(Yes/No)</i>	<b>Gap</b> <i>(Briefly describe gap)</i>	<b>Estimated System/Process Remediation Effort</b> <i>(Required number, type of skilled resource, person hours required)</i>	<b>Business Processes Impacted</b> <i>(Briefly describe)</i>	<b>Business Processes/Documentation Revisions Required &amp; Effort Estimates</b>
	requirements specified in the transaction's corresponding CAQH CORE Benefit Enrollment Operating Rule.						
<b>17</b>	A HIPAA-covered entity or its agent's messaging system must have the capability to receive and process large Batch transaction files which must be received, processed and the appropriate response provided within the time specified in the applicable CAQH CORE Rule.						
	<i>Response Time, Time Out Parameters, and Re-transmission (§4.2.10)</i>						
<b>18</b>	If the HTTP Post Reply Message is not received within the 60 second response period, the client system should send a duplicate transaction no sooner than 90 seconds after the original attempt was sent.						
<b>19</b>	Client system should submit no more than 5 duplicate transactions within the next 15 minutes if no response is received after the second attempt.						
<b>20</b>	If the additional attempts result in the same timeout termination, the client system should notify the submitter to contact the receiver directly to determine if system availability problems exist or if there are known Internet traffic constraints causing the delay.						
	<i>Publication of Entity-Specific Connectivity Companion Document (§4.3)</i>						
<b>21</b>	Servers must publish detailed specifications in a Connectivity Companion Document on the entity's public web site.						
	<i>Envelope Metadata (§4.4.2)</i>						
<b>22</b>	The Envelope Metadata specified in Table 4.4.2 pertains to the Message Envelope SOAP+WSDL. With the exception of <i>ErrorCode</i> and <i>ErrorMessage</i> fields, which are only sent in the response, the CAQH CORE required						

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

<b>Rule Req. #</b>	<b>CAQH CORE Operating Rule Requirement</b>	<b>System/Process Impacted</b> <i>(Based on results from System Inventory and Impact Analysis Worksheet; if no impact enter N/A)</i>	<b>System/Process Currently Meets the Requirement</b> <i>(Yes/No)</i>	<b>Gap</b> <i>(Briefly describe gap)</i>	<b>Estimated System/Process Remediation Effort</b> <i>(Required number, type of skilled resource, person hours required)</i>	<b>Business Processes Impacted</b> <i>(Briefly describe)</i>	<b>Business Processes/Documentation Revisions Required &amp; Effort Estimates</b>
	envelope metadata for the request and response are required to be identical.						
	<i>Processing Mode (§4.4.3.1)</i>						
<b>23</b>	A HIPAA-covered entity or its agent must support the transaction processing mode requirements specified in the <i>COREProcessingModePayloadTypeTables.docx</i> companion document when exchanging transactions in conformance with this CAQH CORE Connectivity Rule v3.1.0.						
<b>24</b>	The Processing Mode requirements specified also apply when a HIPAA-covered entity or its agent are exchanging the transactions addressed by this rule using any other connectivity method as permitted by the CAQH CORE Safe Harbor.						
	<i>Enumeration of Payload Type Fields (§4.4.3.2)</i>						
<b>25</b>	A HIPAA-covered entity or its agent must support the requirements for identifying the payload ( <i>PayloadType</i> ) carried within the content of the Message Envelope as specified in the <i>COREProcessingModePayloadTypeTables.docx</i> companion document to this CAQH CORE Connectivity Rule vC3.1.0.						

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
Analysis & Planning Guide for Implementing CAQH CORE Benefit Enrollment Operating Rules**

**Appendix D: Stakeholder Overview Transaction Flow Diagrams<sup>5</sup>**



\*Defined in 45 CFR Section 162.1501 as "... transmission of subscriber enrollment information from the sponsor of the insurance coverage, benefits, or policy, to a health plan to establish or terminate insurance coverage."

<sup>5</sup> For connectivity requirements and related information regarding the actual exchange of the transactions, please reference §7.3 Sequence Diagrams of the [CAQH CORE Connectivity Rule vC3.1.0](#).