



2020 K Street, NW
Suite 900
Washington, DC 20006

202.517.0400
www.caqh.org

June 26, 2020

William W. Stead, MD
Chair
National Committee on Vital and Health Statistics
3311 Toledo Road
Hyattsville, MD 20782-2002

Re: Update on CAQH CORE Operating Rules Proposed for Federal Adoption

Dear Dr. Stead:

In May 2020, CAQH CORE adopted a new operating rule structure organized by business transaction rather than phases. **No substantive changes were made to the operating rule requirements.** The naming and versioning conventions utilized for all CAQH CORE Operating Rules were updated to reflect the new structure. As such, the three operating rules proposed to the National Committee on Vital and Health Statistics (NCVHS) by the CAQH CORE Board in its [February 2020 letter](#) have been renamed and re-versioned. The table below provides a crosswalk between the old and new naming and versioning conventions for the updated structure.

| CAQH CORE Operating Rules Proposed to NCVHS – 2020 | |
|---|---|
| <i>In May 2020, CAQH CORE adopted a New Operating Rule Structure organized by business transaction rather than phases. No substantive changes were made to the rule requirements.</i> | |
| Former Phase-based Operating Rule Name | Updated Business Transaction-based Operating Rule Name |
| CAQH CORE Prior Authorization (278) Data Content Rule v5.0.0 (Phase V) | CAQH CORE Prior Authorization & Referrals (278) Data Content Rule vPA.1.0 |
| CAQH CORE Prior Authorization (278) Infrastructure Rule v4.1.0 (Phase IV) | CAQH CORE Prior Authorization & Referrals (278) Infrastructure Rule vPA.2.0 |
| CAQH CORE Connectivity Rule v4.0.0 (Phase IV) | CAQH CORE Connectivity Rule vC3.1.0 |

The benefits of the new operating rule structure include:

- More logical organization whereby there is not an endless number of operating rule phases.
- Operating rules align with daily operations of stakeholders.
- Enhanced flexibility and more rapid rule development efforts.
- Ability to apply a single connectivity rule version across all rule sets.
- CORE Certifications based on business transactions.

To assist the industry and NCVHS with this transition, CAQH CORE:

- Updated all links to the former operating rules to automatically redirect to the corresponding business transaction-based operating rule; the naming and versioning updates are tracked in the Revision History at the front of each rule.
- Added a note on our [Prior Authorization Operating Rules website](#) clarifying which CAQH CORE Operating Rules are proposed for federal mandate and a crosswalk of the former and new naming conventions.
- Developed a [two-page overview](#) of the proposed prior authorization and connectivity operating rules for NCVHS and other entities to reference when reviewing the rule set.
- Is in contact with the CMS Division of National Standards to align website content related to the federally mandated operating rules.

We look forward to presenting the CAQH CORE Prior Authorization and Connectivity Operating Rules at the August NCVHS meeting. Thank you for your consideration of these operating rules for federal adoption. Should you have questions for CAQH CORE, please contact me at atodd@caqh.org or at 202-664-5674.

Sincerely,



April Todd
SVP, CAQH CORE & Explorations

cc:

Alexandra Goss, Co-Chair, NCVHS Subcommittee on Standards and Review Committee
Richard W. Landen, Co-Chair, NCVHS Subcommittee on Standards and Review Committee
Cora Tracy, Director, CMS Program Management and National Standards Group
Madhu Annadata, Director, CMS Division of National Standards
Robin Thomashauer, President, CAQH

CAQH CORE Board Members:

Susan Turney, MD, MS, FACMPE, FACP; President and CEO, Marshfield Clinic Health System; CAQH CORE Board Chair
Tim Kaja; COO, UnitedHealthcare Networks; CAQH CORE Board Vice Chair
Kenneth L. Chung DDS, MPH; CEO, ComfortCare Dental
Jason Delimitros, VP, Health Plan Operations, Centene
Renee Ghent, VP, Aetna IT Commercial, Digital & Innovation Delivery
Marilyn J. Heine, MD, FACEP, FACP, FFSMB, FCPP; Clinical Assistant Professor of Medicine, Drexel University College of Medicine
Linda Reed, RN, MBA, CHCIO, FCHIME; VP and Chief Information Officer, St. Joseph's Health
Stephen Rosenthal, SVP, Population Health Mgmt and President of CMO, Montefiore Medical Center
Chris Seib, Chief Technology Officer and Co-Founder, InstaMed
Michael S. Sherman, MD, MBA, MS; Chief Medical Officer, Harvard Pilgrim Health Care
Troy Smith, VP, Healthcare Strategy and Payment Transformation, BCBSNC