CAOH. CORE



Matching Payments to Services Delivered

What Every Provider and Health Plan Should Expect, and What Every Trading Partner Should Deliver

> Tuesday, November 10th, 2015 2:00-3:00pm ET

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Thank You Speakers!

CAQH CORE would like to thank our guest presenters for today's webinar.



Pat Wijtyk Senior Health Reimbursement Specialist ASC X12



Priscilla C. Holland AAP Senior Director Healthcare Payments NACHA



Session Outline

- 1. Welcome and Introduction
- 2. Value of Interconnected Remittance-Payment Transactions
- 3. ASC X12 v5010 835
- 4. NACHA CCD+ Specification
- 5. CAQH CORE Reassociation Rule
- 6. Q & A

Polling Question #1: Use of EFT/ERA Transactions

Please indicate the extent to which your organization sends or receives health care payments through EFT (ACH Network only).

- 1. 1%-25% of the time
- 2. 26%-50% of the time
- 3. 51% 75% of the time
- 4. Above 75% of the time
- 5. We neither send nor receive health care payments through EFT (ACH Network only)





Robert Bowman Senior Manager



Barrier to Electronic Payments

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From the *Federal Register*:

"A barrier for health care providers to the use of Electronic Funds Transfer (EFT) for health care claim payments is that the Electronic Remittance Advice (ERA) arrives at a different time than the associated health care payment/processing information that is transmitted via EFT."



EFT and ERA: Operating Rules Build On Standards

- Healthcare operating rules pair data content and infrastructure operating rules to help data flow consistently in *varied settings and with various vendors*.
- Operating Rules can address gaps in standards, such as additional content available with further use of standard, or identify infrastructure needed to ensure electronic transaction flow among standards.



ACH CCD+ & X12 v5010 835

- EFT: NACHA CCD+ Addenda (*must* contain the TRN Reassociation Trace Number data segment as defined by X12 835 TR3 version 5010)
- ERA: X12 v5010 835

CAQH CORE EFT & ERA Operating Rules

- Provider enrollment in EFT and ERA
- Infrastructure for supporting the ERA
- Uniform use of codes for conveying claim adjustments/denials
- Reassociation of the EFT and ERA

Together, EFT & ERA Standards and Operating Rules deliver efficiency and consistency across the healthcare industry



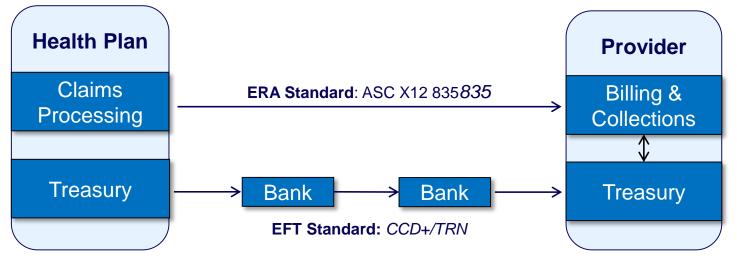
EFT and ERA Transaction Flow

EFT and ERA Operating Rules represent the convergence of financial services and healthcare:

- Both transactions are sent using "recognized" electronic HIPAA standards.
- Aim is to increase adoption of both standards in healthcare.

Together the transactions foster the goals of administrative simplification by moving the process of reimbursement from paper to electronic:

- ERA is an electronic transaction that enables providers to receive claims payment information from health plans electronically; ERA files are intended to replace the paper Explanation of Payment (EOP).
- EFT enables providers to receive payments from health plans electronically.





Polling Question #2: EFT/ERA Implementation

Has your use of EFT (ACH) for health care payments saved your organization time/money?

- 1. Yes, a substantial amount
- 2. Yes, somewhat
- 3. No
- 4. Do not know
- 5. We do not conduct this transaction





ASC X12N ASC X12 835 V5010

November 10, 2015

Pat Wijtyk Senior Health Reimbursement Specialist



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- Visit <u>www.x12.org</u> for additional details about ASC X12.



ABOUT ASC X12

- Chartered by the American National Standards Institute more than 30 years ago.
- Develops and maintains EDI and CICA standards and XML schemas which drive business processes globally.
- ASC X12 membership includes technologists and business process experts, encompassing health care, insurance, transportation, finance, government, supply chain and other industries.
- For additional information, visit <u>www.x12.org</u>.



Compliant ASC X12 5010 835 Transaction

Some challenges with the 835:

- Reassociation 1 835 (ST-SE) to 1 payment
- Balancing
- Payment EFT vs. Check
- Timing of receipt of 835 and associated payment
- Understanding reason why amount was adjusted (360)
- Structure of 5010 835 transaction
- Responsibilities of Trading Partners



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835 & CCD+ REASSOCIATION

CCD+ Reassociation Data Elements				835 data Elements		
CCD+ Record #	Field #	Field Name	Segment	Element	Element Name	
6	7	Identification Number	REF	02	1000B Loop TJ Reference Identification (TIN)	
5	9	Effective Entry Date	BPR	16	Date (EFT Effective Date)	
6	6	Amount	BPR	02	Monetary Amount (Total Actual Provider Payment Amount)	
7	3	Payment Related Information	TRN	01	Trace Type Code	
			TRN	02	Reference Identification (EFT Trace Number)	
			TRN	03	Originating Company Identifier (Payer Identifier)	
			TRN	04	Reference Identification (Originating Company Supplemental Code)	



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Compliant ASC X12 5010 835 transaction

Balanced 835:

- Common reason for an out of balanced transaction is incorrect adjustments
 - Missing dollar amounts
 - Adjustment repeated at line and claim
 - Provider level adjustments
- The 835 TR3 contains front matter section **1.10.2.1 Balancing** that explains how the transaction must balance at all 3 levels



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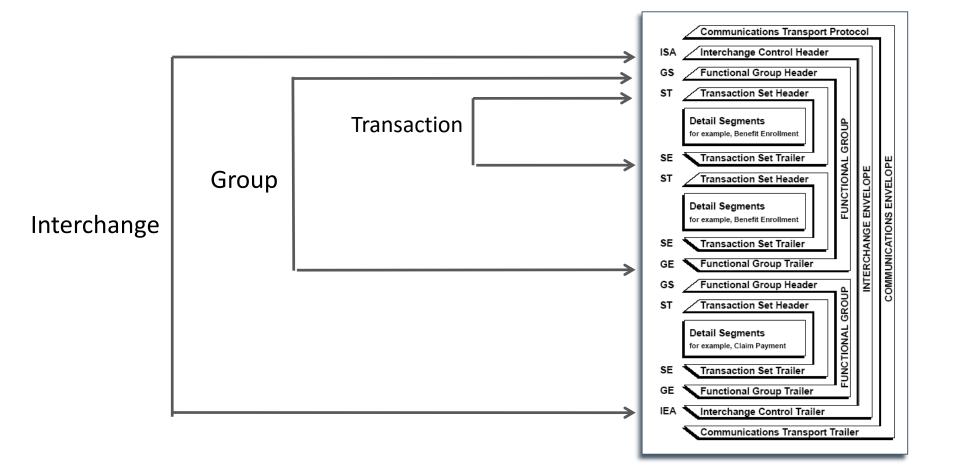


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Compliant ASC X12 5010 835 transaction

Structure of the 835 transaction:

Enveloping Theory

- One transaction contains ONLY one payment
- One Functional Group contains 1 or more transaction
 - Contains 1 or more than 1 payment
- One Interchange contains 1 or more than 1 payment
- **One payment** = one EFT or one check = one trace number



Compliant ASC X12 5010 835 Transaction

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Responsibilities of Trading Partners

- All covered entities MUST comply will all HIPAA and ACA mandated rules.
- Any entity that has a contract or business associate agreements with a covered entity MUST comply with all HIPAA and ACA mandated rules.
- This includes: compliant transaction, CAQH CORE rules, EFT rules



Compliance

• Resolution of compliance issues

RFI Portal – The portal provides access to information related to the meaning, use, and interpretation of ASC X12 Standards, Guidelines, and Technical Reports, including Technical Report Type 3 (TR3) implementation guidelines. The information is available in the form of responses to questions submitted by implementers of the ASC X12 products.

http://www.x12.org/x12org/subcommittees/x12rfi.cfm

• Enforcement of 835 transaction

Lies within the 5010 TR3



Resources

- Accredited Standards Committee X12
 - ASC X12 develops and maintains EDI and CICA standards which drive business processes globally. Membership encompasses health care, insurance, transportation, finance, government, supply chain, and other industries
 - <u>X12.org</u>
- Purchase Guides
 - Source for ASC X12 EDI products, version 005010 and others
 - <u>http://store.x12.org/store/</u>
- Code Lists external to the X12 family of standards
 - Includes CARCs, RARCs, Claim Status and Category Codes, for example
 - <u>wpc-edi.com</u>
- RFI Portal
 - RFI Portal provides access to information related to the meaning, use, and interpretation of ASC X12 Standards, Guidelines, and Technical Reports, including Technical Report Type 3 (TR3) implementation guidelines.
 - <u>http://www.x12.org/x12org/subcommittees/x12rfi.cfm</u>



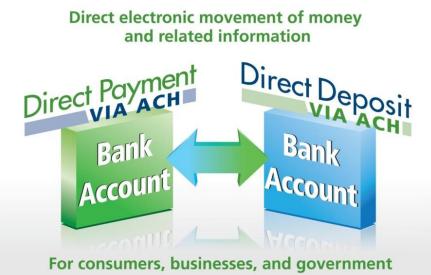
NACHA CCD+ Specifications

Priscilla C. Holland AAP, Senior Director Healthcare Payments NACHA – The Electronic Payments Association



Brief Introduction to NACHA and the ACH Network

- NACHA is the private sector rulemaking organization that administers the ACH Network.
- NACHA is the standards organization for the healthcare EFT standard.
- Develops, maintains, and enforces the NACHA Operating Rules.
- The ACH Network:
 - Facilitates global commerce by serving as a safe, efficient, ubiquitous and highquality electronic payment system; it is best known for Direct Deposit and Direct Payment.
 - Is accessible via more than 13,000 U.S. financial institutions.
 - Processed close to 22 billion ACH payments in 2013, moving almost \$39 trillion in value.
 - Provides funds transfer and settlement of credit and debit card transactions.





Value Proposition for Providers of Automation of EFT & ERA

- The 2014 CAQH Report indicates that a provider will save an estimated \$3.04 per payment received by EFT via ACH over check payments. Combining EFT & ERA with auto posting can save a provider an estimated \$7.21 per payment.
- Reducing administrative work and days in accounts receivable (NACHA Case study went from 25 days to 13 days in A/R with EFT via ACH and ERA).
- Reducing account receivable processing costs by moving from paper checks to EFT via ACH and ERA (NACHA Case study – hospital reduced A/R costs by 70%).
- Auto Reconciliation reduces posting errors (NACHA Case Study has a 76% match on day received and 98% by day 2).
- Receive health plan payments weeks faster to bill and collect remaining patient payment responsibility sooner.



Case Studies





Common Industry Issues with Healthcare EFT Standard

- Health Plans STILL not offering to deliver the healthcare EFT standard for claims reimbursement payments if it is requested
- 2. Health Plans with Business Associates that do not support the healthcare EFT standard or ERA
- 3. Incorrectly formatted TRN Reassociation Trace Number in the healthcare EFT standard addenda
- 4. Incorrect information in the Company Name field identifying the health plan sending the ACH payment



Healthcare EFT Standard – HIPAA Standard

- Patient Protection Affordable Care Act (ACA) Section 1104 Administrative Simplification mandates the identification of a *healthcare EFT standard transaction and development of operating rules for HIPAA standard transactions*
- 45 CFR 162.1602 identifies the healthcare EFT standard as the NACHA CCD+Addenda (effective Jan 1, 2014)
 - Addenda must be populated with the TRN Reassociation Trace Number as defined in the ASC X12 835 version 5010 TR3 Report (Implementation Guide)
 - The TRN data segment is carried in the healthcare EFT standard and the Electronic Remittance Advice (ERA) 835 and used to reassociate the payment with the ERA
 - All health plans must be able to deliver the healthcare EFT standard for claims reimbursement payments if it is requested by the provider
 - Allows for payments processed through other electronic payment methods including cards and wire transfer BUT they are <u>not</u> the healthcare EFT standard



HIPAA Standard Transaction Requirements for Covered Entities

45 C.F.R. § 162.925 Additional requirements for health plans, (a):

- 1) If an entity requests a health plan to conduct a transaction as a standard transaction, the health plan must do so.
- 2) A health plan may not delay or reject a transaction, or attempt to adversely affect the other entity or the transaction, because the transaction is a standard transaction.



Health Plan's Business Associate Does Not Offer Healthcare EFT Standard

- Business Associates of a Covered Entity that don't comply or offer HIPAA standard transactions - is a HIPAA Violation
- 45 C.F.R. §162.923 (c) Use of a business associate.
 - A covered entity may use a business associate, including a health care clearing house, to conduct a transaction covered by this part. If a covered entity chooses to use a business associate to conduct all or part of a transaction on behalf of the covered entity, the <u>covered entity</u> <u>must require the business associate to do the following</u>:
 - 1. Comply with all applicable requirements of this part (HIPAA).
 - 2. Require any agent or subcontractor to comply with all applicable requirements of this part.



Changes to the NACHA Operating Rules to Align with Healthcare

Details within the NACHA Operating Rules and CCD+ Standard were modified to align with Healthcare EFT Standard and EFT & ERA Operating Rules

Overview of NACHA Rule Changes	Detail	
Standard Identification of Health Care EFTs		
Additional Formatting Requirements for Health Care EFTs	ents for Trace Number) data segment, and to identify itself in the transaction by its name as it would be	
Delivery of Payment Related Information (Reassociation Number)	The rule requires an RDFI to provide or make available, either automatically or upon request, all information contained within the Payment Related Information field of the Addenda Record, no later than the opening of business on the second Banking Day following the Settlement Date. Further, this Rule requires the RDFI to offer or make available to the healthcare provider an option to receive or access the Payment Related Information via secure, electronic means	
Addition of New EDI Data Segment Terminator	\sim 1 be rule provides for the use of a second data segment terminator, the filde ("~") to any data	
Health Care Terminology within the NACHA Operating Rules	The rule includes healthcare-related definitions	



TRN Reassociation Trace Number

- CCD Addenda must be populated with the TRN Reassociation Trace Number as defined in the ASC X12 835 version 5010 TR3 Report (Implementation Guide)
- Format incorporated into the NACHA Operating Rules
- Allows banks to review TRN for compliance and return entry if the TRN Reassociation Trace Number is not formatted correctly
- Also allows a financial institution to file a potential violation through NACHA's National System of Fines



- NACHA Operating Rules require that the Company Name field for healthcare claims payments must contain the name of the Health Plan originating the payment, or, where an organization is selfinsured, the name of the organization's third-party administrator that is recognized by the healthcare provider and to which the health care provider submits its claims.
 - The name of a health plan's vendor should not be included in the Company Name field
 - Without the correct name in the Company Name field may providers cannot post the claim payment or cannot contact the sender of the payment if there are questions

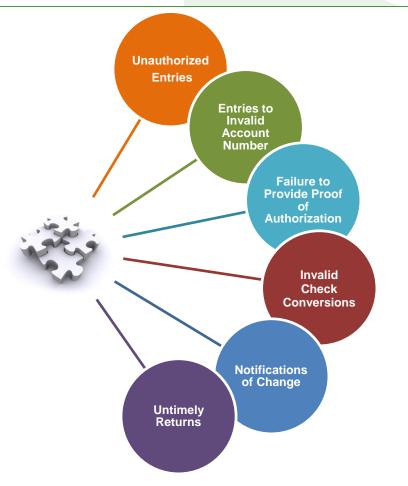


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About the System of Fines

The National System of Fines is the enforcement mechanism for the ACH Network:

- Provides a means for FIs to report and resolve alleged violations of the *Rules*
- Provides a formal channel for the evaluation of circumstances related to possible rules violations and the imposition of fines if appropriate
- Reduces exception processing for FIs
- Maintains the reputation of the ACH Network





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NACHA Resources

Healthcare Payments Resources Website

- Provides a repository of information on a wide variety of topics for both financial institutions and the healthcare industry. Includes links to many other resources, as well as customized information to help "translate" concepts from one industry to the other (FAQs, reports, presentations).
- <u>http://healthcare.nacha.org/</u>

Healthcare EFT Standard Information

- Located within the healthcare industry tab of the above website, specific information can be found on the healthcare EFT standard.
- <u>http://healthcare.nacha.org/</u>

Healthcare Payments Resource Guide

- Publication designed to help financial institutions in implementing healthcare solutions. It give the reader a basic understanding of the complexities of the healthcare industry, identify key terms, review recent healthcare legislation, and discuss potential impacts on the financial services industry.
- Order from the NACHA eStore "Healthcare Payments" section: <u>www.nacha.org/estore</u>.

• Healthcare ePayments Newsletter

 Quarterly newsletter for healthcare and financial services industry. Must register to receive the free newsletter at listrequest@nacha.org

<u>ACH Primer for Healthcare Payments</u>

- A guide to understanding EFT payment processing. Introduces the healthcare industry to the Automated Clearing House (ACH) Network, explains ACH transaction flow and applications, and includes two "next steps checklists," one each for origination and receipt. (Free pdf publication)
- <u>https://healthcare.nacha.org/ACHprimer</u>



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CAQH CORE Reassociation Rule

Improve Provider Revenue Cycle Management and Health Plan Resource Allocation

> Robert Bowman Senior Manager

CAQH CORE EFT & ERA Reassociation (CCD+/835) Rule -- Problem Addressed & Key Impact

Problem Addressed by Rule

Challenges with provider reassociation of <u>remittance</u> data to <u>payment</u> data because necessary data provider requires are incorrect, missing, not available, or have not been requested on the two transactions in a way that is meaningful to the provider or its financial institution.

Key Impacts

- 1. Coordinates healthcare and financial services industry.
- 2. Provides assurance that trace numbers between payments and remittance can be used by providers.
- 3. Reduces level of open accounts receivable by enabling provider to generate cross-over claims to other payers and to collect payment from patient.
- 4. Enables provider to more quickly address denials or appeal adjustments to claim amount.

EFT & ERA Reassociation (CCD+/835) Rule: Three Key Rule Requirements

Pre- Payment: Provider Enrollment



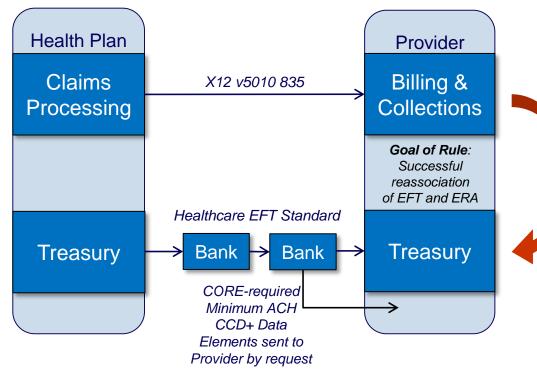
1. CORE-required Minimum CCD+ Reassociation Data Elements:

- Health plan must inform provider during enrollment to contact bank for the delivery of CORE-required Minimum CCD+ Reassociation Data Elements (banks not required to report)
- Provider must proactively contact bank for data
- NOTE: The CAQH CORE EFT & ERA Enrollment Data Rules contain complementary requirements

Claims Payment Process

2. Elapsed Time Requirements:

Health plan must release the 835 no sooner than three business days before and no later than three business days after the CCD+ Effective Entry Date 90% of time and track/audit this elapsed time requirement



3. Resolving Late/Missing EFTs/ERAs: Health plan must establish written Late/Missing EFT and ERA Transactions Resolution Procedures

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Industry Issues & Potential Solutions



Lack of Uniformity in the CARCs & RARCs

Enrollment & ACH





CAQH CORE Uniform Use of CARCs & RARCs (835) Rule Problem Addressed

Problems Addressed by Rule:

Providers do not receive uniform code combinations for same or similar business scenarios from all health plans; as a result, are unable to automatically post claim payment adjustments and denials accurately and consistently.

There could be over 954 RARCs, approximately 323 CARCs and 4 CAGCs resulting in thousands of possible code combinations for review by providers.



Potential Solution: Uniform Use of CARCs and RARCs Rule CORE Code Combination Adjustments

Key Impacts -- Use of CORE 360 Rule has Mitigated:

- Unnecessary manual provider follow-up
- ✓ Faulty electronic secondary billing
- ✓ Inappropriate write-offs of billable charges
- Incorrect billing of patients for co-pays and deductibles
- ✓ Posting delays

Maintenance process applied

300,000 code combinations



Streamlined

code set

4 common business

scenarios

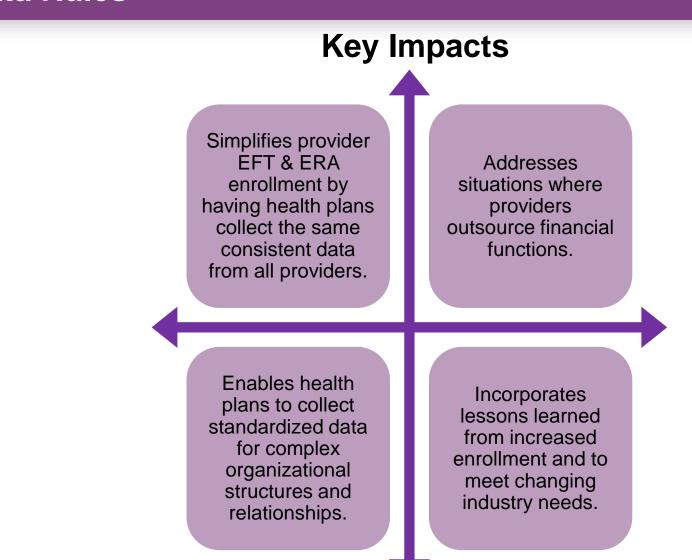
CAQH CORE EFT & ERA Enrollment Data Rules Problem Addressed

Problems Addressed by Rule

Providers are challenged by variances in the processes and data elements requested when enrolling in EFT & ERA across multiple Health Plans. There are unnecessary manual processing of multiple forms requesting a range of information – not necessarily the same information between Health Plans–often using a wide variety of data terminology for the same concept ("Routing Number" vs. "Bank Routing Number").

Key elements are excluded from enrollment forms including those with a strong business need to streamline the collection of data elements and those essential for populating the EFT Standard (ACH CCD+) and the ASC X12 v5010 835.

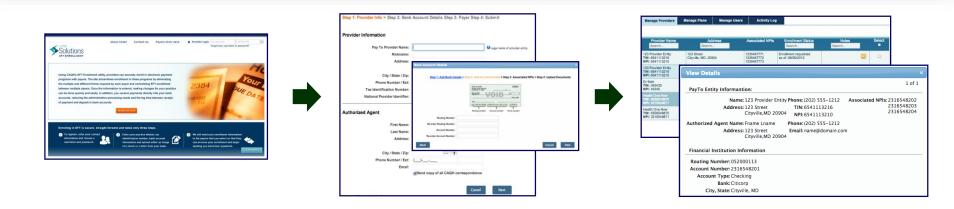
Potential Solution: CAQH CORE EFT & ERA Enrollment Data Rules





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Streamlined Enrollment – CAQH EnrollHub



- Web-based data entry for provider EFT and ERA enrollment information.
- Alignment with federally-mandated operating rules for definition of the standard enrollment data set and supporting documents.
- Web-based access portal for health plan customers.
- Multi-payer provider adoption campaigns.
- Telephonic provider support center.
- Voided check and other uploaded document processing.
- Pre-note transactions via ACH partners to validate bank account information.



CAQH CORE Resources for EFT & ERA





Contact Your Health Plans!

To benefit from the EFT and ERA mandates, ensure your provider organization has requested the transactions from its health plans. To help facilitate this request, CAQH CORE developed the <u>Sample</u> <u>Provider EFT Request Letter.</u>

- Providers can use this sample letter as template email or talking points with health plan contacts to request enrollment in EFT/ERA and benefits of operating rules.
- The tool includes background on the benefits of EFT, key steps for providers, an actual letter template, and glossary of key terms.



Polling Question #3: EFT & ERA Implementation Challenges

Which of the following would you consider to be the biggest challenge to your organization's implementation of the CAQH CORE EFT/ERA Operating Rules:

- 1. Fully understanding the EFT & ERA Operating Rules
- 2. Overcoming resource constraints (i.e. time, staff, internal expertise)
- 3. Identifying and completing necessary system updates
- 4. Working and testing with Trading Partners (e.g. lack of communication between your organization and your vendor)
- 5. Have not encountered challenges/Not applicable



Audience Q & A

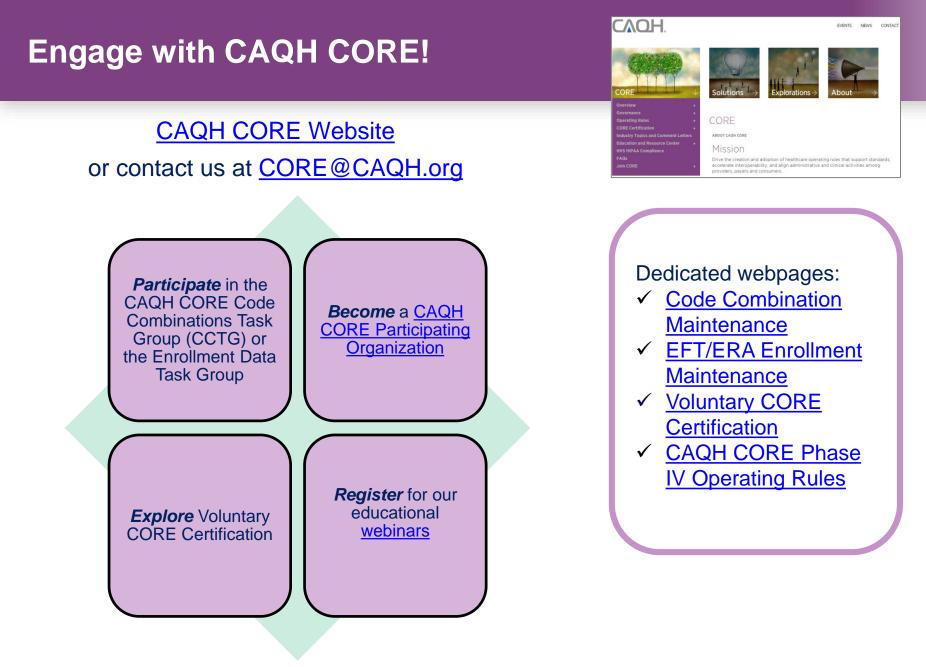
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Key Takeaways

- There is lack of understanding among all stakeholders of how easy it now is to use the NACHA CCD+ specification, the v5010 835 and the CAQH CORE Reassociation Rule to pair together and thus drive the full value of the interconnected paymentremittance transactions.
- EFT and ERA Operating Rules represent the convergence of financial services and healthcare and aim to move the process of reimbursement from paper to electronic.
- Understanding how the ASC X12 835 and the NACHA ACH CCD+ work together, as well as how the CORE Reassociation Rule adds value to the process leads to positive impacts to provider revenue cycle management.







Thank you for joining us!

Website: www.CAQH.org/CORE

Email: CORE@CAQH.org





