



Phase I CAQH CORE 103: Eligibility and Benefits Certification  
Exemption Policy  
version 1.1.0 March 2011

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## **BACKGROUND**

*This rule addresses certification exemptions that health plans seeking Phase I CORE certification may request when the health plan has a scheduled migration of an existing IT system(s) if the remainder of the health plan's IT systems are Phase I CORE compliant. This rule is complementary and does not replace the following Phase I CORE policies, which are already part of the Phase I CORE 102 Eligibility and Benefits Certification Policy version 1.1.0.*

- *Entities may seek certification for their subsidiaries versus their corporate entity. The Phase I CORE Seal will apply to the subsidiary or the corporation, whichever entity seeks CORE certification.*
- *If a CORE-certified entity is acquired by an entity that is not Phase I CORE-certified, that company will only be allowed to be CORE-certified if the acquired company is the only business that is applicable to the Phase I CORE Operating Rules. If this is not the case, then the newly merged company will be required to seek certification.*

## **POLICY**

**Section 1: Required Criteria to be granted a Phase I CORE Health Plan IT System Exemption:** Any health plan seeking an IT System Certification Exemption must meet the following criteria:

### **Subsection 1.1: Membership Percentage**

Percentage of a health plan's full membership eligibility data that is processed by the IT system(s) in question:

- No more than 30 percent of a health plan's total membership can be processed by the IT system(s) to be covered by the exemption.

### **Subsection 1.2: Timing**

Time period for which the IT system(s) in question must be scheduled for migration:

- Migration must be scheduled for completion no later than 12 months from the date of when the health plan is granted Phase I CORE certification.
- If migration is not completed within the agreed-upon 12 months from the date of Phase I CORE certification, the health plan will be de-certified (see below).

## **Section 2: Deadlines for exemptions**

- First-time IT system *Phase I exemptions* will only be granted until December 31<sup>st</sup>, 2007. Therefore, by December 31<sup>st</sup>, 2008, all Phase I CORE-certified health plans will be fully Phase I compliant unless, after December 31<sup>st</sup>, 2007, a Phase I CORE-certified health plan acquires another health plan that is not Phase I CORE-certified. If such an acquisition occurs by a Phase I CORE certified health plan, that health plan can seek additional/new IT system exemptions for its newly acquired entity.
- Exemptions that are due to newly acquired entities will only be granted if the same above parameters on time periods and percentage of membership are met.

## **Section 3: Exemption Request and Review Process**

### **Subsection 3.1: Exemption Request**

Any health plan seeking an exemption must follow the Phase I CORE Certification Policy, excluding the IT system(s) for which they are seeking the exemption.

- When providing CAQH with the documentation to prove successful Phase I CORE certification testing and attest to HIPAA compliance, the health plan must provide CAQH with an executive-level attestation stating that the health plan meets the agreed-upon IT system exemption criteria and has the ability to identify those transactions to which the exemption applies. As a result, CORE will be able to accurately respond to those Requests for Review of Possible Non-Compliance that are the result of IT system exemptions.

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- If possible, the plan will communicate to CAQH, in a way that is most meaningful to the market/providers, the systems/groups/products for which Phase I CORE Operating Rule eligibility data will not be available until after the exemption time period expires.
- If the proper Phase I CORE certification documentation is received, CAQH will be responsible for granting exemptions just as it is responsible for granting Phase I CORE Seals.
- The 12-month IT system exemption period will begin on the day that the health plan is granted Phase I CORE certification (a CORE Seal) by CAQH.

### **Subsection 3.2: Review Process**

On or before the last business day of the month in which exemption ends, the health plan must communicate to CORE that the migration is/is not complete.

- If a Phase I CORE-certified health plan with an exemption communicates to CORE that the IT system migration was not completed in the agreed-upon timeframe, the CORE Enforcement Committee will agree, via conference call/meeting, to remove the health plan's CORE Seal unless extenuating circumstances exist.
- Decisions by the CORE Enforcement Committee to remove the Phase I CORE Seal, or not to remove the Phase I CORE Seal due to extenuating circumstances, shall be subject to review by the CORE Steering Committee within 20 business days. Decisions by the Steering Committee shall be final.
- If de-certified, the health plan will need to reapply for Phase I CORE certification.
- The Phase I CORE Enforcement Policy outlines the steps to become re-certified after being de-certified. Health plans wanting to become re-certified due to non-compliance with an IT exemption rule will need to be re-certified for all CORE Phase I transactions.

### **Section 4: Communication Concerning Which CORE-certified Systems Have Exemptions**

- In Phase I, all CORE-certified entities will be listed on the CAQH website (see Phase I CORE 102 Eligibility and Benefits Certification Policy version 1.1.0).
- There will be an asterisk (\*) next to those certified health plans that have an IT system exemption. The asterisk will indicate that a portion of the plan's membership systems are not Phase I CORE compliant; detailed information identifying those systems/groups/products specific to each plan will be provided, if available.
  - The asterisk will only be removed when the health plan communicates to CAQH that its exempted system(s) are in compliance.