



Phase II CAQH CORE 205 Enforcement Policy
version 2.1.1 May 2014

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GUIDING PRINCIPLES

- *CORE participants will be encouraged to privately resolve disputes before submitting a formal complaint of non-compliance against a CORE-certified entity.*
- *Enforcement will be a complaint-driven process that will require documentation (electronic or paper) demonstrating multiple instances of non-compliance.*
- *Any healthcare provider that is an end-user of a CORE-certified product/service may lodge a complaint against a CORE-certified entity. Beyond end-users, only an organization that is CORE-certified and involved in the alleged non-compliant transactions may file a complaint.*
- *The details of a specific complaint will remain confidential. Names or other identifying information will not be publicly released. This information will only be used and disclosed by CORE for its non-compliance review. If an entity is found to be in actual violation of a CORE Operating Rule(s), its certification will be terminated and its name removed from the CORE website if the complaint is not remedied per the CORE enforcement timeline.*
- *The complaint process will be progressive, but will last no more than six (6) months between filing of complaint and resolution. Extensions may be granted on a case-by-case basis due to mitigating factors decided upon by the CORE Enforcement Committee.*
- *The CORE Enforcement Committee will consist of a balance of stakeholder types from the CORE membership (certified health plans, vendors, PMS, provider vendors, clearinghouses, and providers). No one stakeholder type will be permitted to have a dominant representation.*
- *Entities are permitted to withdraw a complaint at any time during the complaint process.*
- *Personal health information (PHI) must not be submitted without appropriate authorization.*
- *CORE will accept and review any submitted complaint that contains the required documentation.*

POLICY

Section 1: Complaint Filing

Every effort must be made to resolve problems before a complaint is filed. Conformance language for each rule should assist entities with what is required of CORE-certified entities.

Subsection 1.1: Step 1: Complaint formally filed with CORE, including proper documentation.

- Includes a completed CORE developed form, Request for Review of Possible Noncompliance, that outlines the violation, and at least five documented examples of the violation(s) over a 30-day period, demonstrating that the violation was not a one-time occurrence but occurred in multiple instances.
- Organization filing complaint must do so within 90 days of the most recent compliance violation(s) for which it is being filed.

Subsection 1.2: Step 2: CORE, under the guidance of the CORE Enforcement Committee, reviews complaint form for completeness and timeliness, and verifies/dismisses complaint.

- Information gathered from entity filing complaint.
- Organization in question given an opportunity to respond to complaint in writing.
- CORE must respond to the complaint within 20 business days.
- All organizations involved in the complaint must respond to requests for information by CORE within 20 business days. The complaint must be deemed valid or invalid within 30 business days after all documentation is reviewed by CORE and requests for information are received.

(Process ends if inquiry dismissed. If inquiry verified, process continues.)

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Section 2: For Verified Complaints Only

Subsection 2.1: Step 1: Entities found to be out of compliance with a CORE Operating Rule(s) will be informed by CORE that they have a defined grace period (40 business days) in order to remedy the problem by successfully retesting for compliance with the rule(s) or be decertified.

- An Enforcement Committee composed of objective participants will review verified complaints, and will be responsible for providing any extension to this grace period.
- Enforcement Committee terms will be limited to one year from date of appointment.
- Conflicts of interest will be avoided on a case-specific basis at the request of the entity being reviewed for noncompliance. If a member of the CORE Enforcement Committee is party to a complaint, then he/she will recuse him/herself for the duration of the resolution of the complaint.
- The membership of the CORE Enforcement Committee will be appointed by the Steering Committee from nominations made by Steering Committee members and/or CORE members. Until there is an equal representation of stakeholders, or until a sufficient number of certified entities exist, Subgroup and/or Work Group Chairs will serve on the Enforcement Committee.
- 10 business days after the grace period, entities will prove they have remedied the problem by presenting to the CORE Enforcement Committee documentation of at least five instances on five different business days over a span of 10 business days in which there was no issue of compliance with the entity that filed the complaint, in addition to providing documentation of successful re-testing.
- The CORE Enforcement Committee will be responsible for granting variances to the 40 business day grace period.

Section 3: For Complaints not Remedied

Subsection 3.1: Step 1: Decertification/removal of CORE Seal.

Section 4: For Decertified Entities Interested in Recertification

Subsection 4.1: Step 1: A decertified entity may seek recertification; entities are responsible for all fees associated with recertification, including any fees for a new CORE Seal.

Entities seeking recertification due to non-compliance will only need to do so for the rule with respect to which they were found to be non-compliant. CORE-authorized Testing Vendors will provide documentation on the entity's compliance with the rule specific to the applicable CORE Certification Test Suite.

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Request for Review of Possible Non-Compliance Form

PREREQUISITES

- 1) Entity filing complaint must be party to the transaction and with the exception of providers, CORE-certified. Any healthcare provider that is an end-user of a CORE-certified product/service may lodge a complaint against a CORE-certified entity.
- 2) Entities being filed against must be CORE-certified.
- 3) Filing this form assumes reasonable steps have already been taken by your company to try to resolve the issue privately with your trading partner, but such efforts were not successful.
- 4) At least five documented examples of the violation(s) over a 30-day period must be provided with this form.
- 5) Entity must file a complaint within 90 days of the most recent compliance violation(s) for which it is being filed.
- 6) The details of a specific complaint remain private. Names or other identifying information will not be publicly released. This information will only be used and disclosed by CORE for its non-compliance review. If an entity is found to be in actual violation of a CORE Operating Rule(s), its certification will be terminated and its name removed from the CORE website if the complaint is not remedied per the CORE enforcement timeline.
- 7) Entities are permitted to withdraw a complaint any time during the complaint process.

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If you have any questions about this form, contact CAQH at: (202) 517 – 0400 or CORE@caqh.org

CORE: Non-Compliance Complaint Form			
Please provide your contact information (All fields required.)			
Organization Name and Type (Health Plan, Provider, Clearinghouse, Vendor)			
Name (First and Last)			
Street Address	City/Town	State	Zip
Telephone Number		Email Address	
Organization filing complaint against (All fields required.)			
Organization Name and Type (Health Plan, Provider, Clearinghouse, Vendor)			
Name (First and Last)			
Street Address	City/Town	State	Zip
Telephone Number		Email Address	
When did this alleged violation occur? mm/dd/yyyy (Required field)			
1.			
2.			
3.			
4.			
5.			

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CORE: Non-Compliance Complaint Form
Have efforts been made to address the problem? Who at the company in question have you been working with to resolve the issue?
Identify the CORE Operating Rules complaint category. (Required field.) Select one category listed below per complaint submission. Complete this form again to file a complaint for another category.
Eligibility <ul style="list-style-type: none"><input type="checkbox"/> Response Time<input type="checkbox"/> System Availability<input type="checkbox"/> Service Type and Benefit Summary<input type="checkbox"/> Patient Financial Responsibility<input type="checkbox"/> Acknowledgements<input type="checkbox"/> Connectivity<input type="checkbox"/> Companion Guide<input type="checkbox"/> Last Name Normalization<input type="checkbox"/> Use of AAA Error Codes
Claim Status <ul style="list-style-type: none"><input type="checkbox"/> Acknowledgements<input type="checkbox"/> Companion Guide<input type="checkbox"/> Connectivity<input type="checkbox"/> Response Time<input type="checkbox"/> System availability
Describe, in detail, the alleged violation. (Required field.) You may attach/upload additional pages as needed. Please enclose at least five examples of your complaint.

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CORE: Non-Compliance Complaint Form	
Please sign and date this complaint. (Required field) SIGNATURE:	DATE:

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SUBMISSION PROCESS

Filing a complaint with CORE is voluntary. However, without the information required on the Non-Compliance Complaint Form, CORE may not be able to proceed with a complaint. Names or other identifying information will remain private unless an entity is found to be in actual violation of a CORE Operating Rule(s), and then their certification will be terminated and their name removed from the CORE website if the complaint is not remedied per the CORE enforcement timeline.

To submit a complaint electronically please:

- Send as an attachment by email to CORE@caqh.org;
- Submit by fax 202-517-0397;
- Mail to:
CAQH re: CORE Compliance Review
1900 K Street, NW
Suite 650
Washington, DC 20006

Note: All signatures must be hand-written. Electronic signatures will not be accepted.

NEXT STEPS

See Phase II CORE 205 Enforcement Policy version 2.1.0 Section 2.