# CAQH. CORE



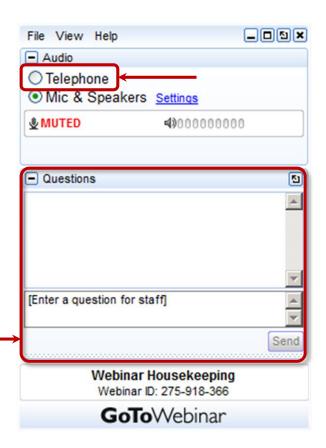
# New Phase IV CAQH CORE Operating Rules

Infrastructure Rules and Requirements

Tuesday, March 22nd, 2016 2:00-3:00pm ET

# Logistics – How to Participate in Today's Session

- Download a copy of today's presentation on the <u>CAQH.org website</u>
  - Navigate to the CORE Education Events page and access a pdf version of today's presentation under the list for today's event
- The phones will be muted upon entry and during the presentation portion of the session
- At any time throughout the session, you may communicate a question via the web
  - Questions can be submitted at any time with the Questions panel on the right side of the GoToWebinar desktop





# **Session Outline**

- 1. Welcome and Introduction
- 2. Update on Phase IV CAQH CORE Operating Rules
- 3. Scope of the Rules
- 4. Benefits and Business Case for Various Stakeholder Groups
- 5. Resources and Phase IV Certification
- 6. Q & A



# Update on Phase IV CAQH CORE Operating Rules

Erin Weber Associate Director



# **CAQH CORE Operating Rules**

INFRASTRUCTURE	CONTENT
Connectivity & Security	Cummanta usa af
Response Time (Batch/Real-time)	Supports use of recognized standards that
System Availability	can deliver
Exception Processing Error Resolution	structured data, e.g., remaining
Roles & Responsibilities	deductible via X12, trace
Companion Guides	number in NACHA CCD+
Acknowledgements	1

**Operating Rules** are developed to facilitate administrative interoperability by building upon recognized standards and ensuring benefit for each critical stakeholder.

Operating Rules compliment and support healthcare and industry neutral standards—they *do not repeat* or reiterate standards.

**Infrastructure rules** apply across transactions – establishing basic expectations on how the US data exchange "system" works, e.g. ability to track response times across all trading partners, safe harbor security.

**Content rules** support the exchange of valuable data that allow stakeholders to access information needed to manage an agile process; rules can address ongoing maintenance, setting expectation of evolution.

# ACA Mandated Operating Rules and Certification Compliance Dates

Phases I-II COMPLIANCE

**January 1, 2013** 

Health plan eligibility

Claim status transactions

HIPAA covered entities conduct these transactions using the CAQH CORE Operating Rules

**Mandated Requirements** 

Phase III COMPLIANCE

**January 1, 2014** 

Electronic funds transfer (EFT)

Health care payment and remittance advice (ERA)

HIPAA covered entities conduct these transactions using the CAQH CORE Operating Rules

**Mandated Requirements** 

ACA-Mandated HHS Health Plan Certification

**TBD** 

ACA mandates health plans must certify to HHS compliance with Eligibility/ Claim Status/ EFT/ERA operating rules and underlying standards

Applies only to health plans and includes potential penalties for incomplete certification

New HHS proposed rule expected April, 2016 Phase IV

**TBD** 

Health claims or equivalent encounter information

Referral, certification and authorization

Enrollment/
disenrollment in a health plan

Health plan premium payments

Health claims attachments (HHS Standard not yet mandated)

Phase IV Op Rules approved for voluntary implementation by CAQH CORE Part Org and CORE Board



# Phase IV CAQH CORE Operating Rules Regulatory Next Steps

# **NCVHS**

HHS

# Industry

CAQH CORE updated NCVHS on the status of the Phase IV Operating Rules (earlier hearing and letter)

CAQH CORE testified before NCVHS Review Committee on the Phase IV CAQH CORE Operating Rules on February 16, 2016

As appropriate, NCVHS could make an adoption recommendation to the HHS Secretary

HHS may publish a regulation in the Federal Register once it determines what is appropriate for Federal mandate

A public comment period (60 days or more) would follow publication of any regulation whereby entities can submit comments on the regulation to CMS/HHS

Based on public comments to the regulation, industry will be required to implement the operating rules, usually within two years of publication of a final regulation





# Phase IV Vetting Process Transparent, Fact-based, Collaborative and Benefit-focused

The public at large and CAQH CORE participants prioritized starting with common infrastructure operating rules for the standards addressed in Phase IV (rather than infrastructure AND data content). Industry analysis determined Phase IV is a *significant step in meeting industry needs to drive well-documented cost reduction opportunity, yet is* achievable resource-wise and technically.

- ✓ Approximately two and a half year development time from initial public outreach to issuance.
- ✓ Nearly 100 non-CORE participants participated in public surveys seeking ideas with greatest return and then rating of options.
- ✓ Over 70 teleconferences held by the various Sub/Work Groups during rule development. Groups had multi-stakeholder Chairs.
- ✓ After creation of initial draft, *draft rules were made available for free* on website throughout process; high level requirements also reviewed on Town Hall calls.
- ✓ Required quorums and participation rates exceeded at all stages. Over 130 HIPAA and non-HIPAA covered entities involved representing Medicare, Medicaids, provider-facing vendors, providers, clearinghouses, TPAs, health plans, etc.
- ✓ Final vote on the full Phase IV package garnered 90% participation and 88% approval. CAQH CORE Board had unanimous approval.

# Complete Set of Phase IV CAQH CORE Operating Rules

Phase IV CAQH CORE 450 Health Care Claim (837) Infrastructure Rule v4.0.0

Session Focus Phase IV CAQH CORE 452 Health Care Services Review – Request for Review and Response (278) Infrastructure Rule v4.0.0

Phase IV CAQH CORE 454 Benefit Enrollment and Maintenance (834)
Infrastructure Rule v4.0.0

Phase IV CAQH CORE 456 Premium Payment (820) Infrastructure Rule v4.0.0

Phase IV CAQH CORE 470 Connectivity Rule v4.0.0



# Scope of Phase IV CAQH CORE Operating Rules

**Robert Bowman**Associate Director



# Scope of Phase IV CAQH CORE Rule Requirements

Reminder: Health Claims Attachments transaction not included; there is no formal HIPAA Health Claims Attachments standard(s).

Infrastructure Requirement	Prior Authorization	Claims	Enrollment/ Disenrollment	Premium Payment
Processing Mode	Batch OR Real Time Required	Batch Required; Real Time Optional	Batch Required; Real Time Optional	Batch Required; Real Time Optional
Batch Processing Mode Response Time	If Batch Offered	X	X	X
Batch Acknowledgements	If Batch Offered	X	Х	X
Real Time Processing Mode Response Time	If Real Time Offered	If Real Time Offered	If Real Time Offered	If Real Time Offered
Real Time Acknowledgements	If Real Time Offered	If Real Time Offered	If Real Time Offered	If Real Time Offered
Safe Harbor Connectivity and Security	X	X	Х	X
System Availability	X	X	X	X
Companion Guide Template	X	X	X	Х
Other	N/A	Include guidance for COB in companion guide	Timeframe requirements to process data after successful receipt and verification of transaction	Timeframe requirements to process data after successful receipt and verification of transaction

X = Required



# Infrastructure Requirements

Based on industry-wide input, the Phase IV Operating Rules focus on infrastructure requirements for data exchange.

A **minimal amount of time** that systems must be available to receive and send data.

An **acknowledgement** to ensure the transaction has been received, has not been lost between entities, and will be addressed.

**Required response times** for acknowledgement and processing for both real-time and large record "batch" submissions.

A **common format** that entities must use when providing information about their proprietary data exchange systems via "companion guides."

Offering at least one common method of connectivity\* (i.e., a "safe harbor") among entities transmitting data electronically.

<sup>\*</sup>Phase IV CAQH CORE Operating Rule connectivity requirements will be discussed in detail at a future CAQH CORE webinar.



# Real Time Processing Mode Response Time Requirements

Real Time Processing Mode Response Time requirements specify the overall length of elapsed time from when a provider/health plan purchaser (sender) sends a transaction to a health plan and the related response transaction is received by the sender.



Infrastructure	X12N v5010	X12N v5010	X12N v5010	X12N v5010
Requirement	837	278	834	820
Real Time Processing Mode Response Time	If Real Time Offered	If Real Time Offered	If Real Time Offered	If Real Time Offered

# **Batch Processing Mode Response Time Requirements**

Batch Processing Mode Response Time requirements specify the overall length of elapsed time from when a transaction is sent to a health plan and when the acknowledgement(s) or response to the transaction is available for pick up (retrieval) by the sender.

- 1 Sent by 9 pm ET on a business day
- 2 Available by 7 am ET within specified # of business days

Infrastructure	X12N v5010	X12N v5010	X12N v5010	X12N v5010
Requirement	837	278	834	820
Batch Processing Mode Response Time	X	X	X	X

# Real Time Acknowledgement Requirements

When a claim is submitted in real time processing mode without adjudication:

### ASC X12N v5010 837 Transaction

- A health plan must return an ACS X12C v5010 999 to indicate Functional Group is rejected
- A health plan must return an ASC X12N v5010 277CA to indicate Functional Group is accepted or accepted with errors

### ASC X12C v5010 278 Transaction

 A health plan must return an ASC X12C v5010 999 to indicate Functional Group was rejected

### ACS X12N v5010 834 & 820 Transaction

 A health plan must return an ASC X12C v5010 999 to indicate the Functional Group is accepted, accepted with errors or rejected

Infrastructure	X12N v5010	X12N v5010	X12N v5010	X12N v5010
Requirement	837	278	834	820
Real Time	If Real Time	If Real Time	If Real Time	If Real Time
Acknowledgement	Offered	Offered	Offered	Offered



# Batch Acknowledgement Requirements

# ASC X12N v5010 837 Transaction

- Health plan must return an ASC X12C v5010 999 to indicate the Functional Group was accepted, accepted with errors, or rejected and to specify the Transaction Set was accepted, accepted with errors, or rejected
- A health plan must acknowledge each claim received using the ASC X12N v5010 277CA unless previous processing resulted in rejection of the Interchange or a Transaction Set in a Functional Group

# ACS X12N v5010 278 Transaction

 An entity must return an ASC X12C v5010 999 to indicate the Functional Group(s) was accepted, accepted with errors, or rejected and to specify the Transaction Set was accepted, accepted with errors, or rejected

# ACS X12N v5010 834 & 820 Transaction

 A health plan must return an ASC X12C v5010 999 to indicate the Functional Group is accepted, accepted with errors, or rejected

Infrastructure	X12N v5010	X12N v5010	X12N v5010	X12N v5010
Requirement	837	278	834	820
Batch Acknowledgement	X	If Batch Offered	X	X



# System Availability Requirements

System Availability requirements establish the amount of time a system must be available to process the specified transactions:

Minimum of **86 percent system availability** (per calendar week)

Publish regularly scheduled **downtime** 



Provide **one week** advance notice on non-routine downtime

Provide information within one hour of emergency downtime

Infrastructure	X12N	X12N	X12N	X12N
Requirement	v5010 837	v5010 278	v5010 834	v5010 820
System Availability	X	X	X	X



# **Companion Guide Requirements**

When an entity publishes a Companion Guide, the CAQH CORE Companion Guide requirements establish the format and flow of Companion Guides.

### Format & Flow Specified in Template

- Introduction
- · Getting Started
- Testing with the Payer
- Connectivity with Payer/Communications
- Contact Information

- Control Segment/Envelopes
- Payer Specific Business Rules and Limitations
- Acknowledgements and/or Reports
- Trading Partner Agreements
- Transaction Specific Information

Infrastructure	X12N	X12N	X12N	X12N
Requirement	v5010 837	v5010 278	v5010 834	v5010 820
Companion Guide	X	X	X	X



# **Unique Phase IV Infrastructure Requirements**

Phase IV Operating Rule	Unique Phase IV Infrastructure Requirement (e.g. not included in previous CAQH CORE Rules)
Phase IV CAQH CORE Health Care Claim Infrastructure Rule	A HIPAA-covered entity or its agent's Companion Guide covering the ASC X12N v5010 837 Claim transaction must include the entity's requirements for coordination of benefits in Section 7 and Section 10 as appropriate.
	The receiver (defined as the HIPAA-covered provider or its agent) of an ASC X12C v5010 999 transaction and an ASC X12N v5010 277CA transaction is required to:  • Process any ASC X12C v5010 999 or ASC X12N v5010 277CA transaction within one business day of its receipt.
	<ul> <li>Recognize all error conditions that can be specified using all standard acknowledgements named in this rule and to pass all such error conditions to the end user as appropriate OR to display to the end user text that uniquely describes the specific error condition(s), ensuring that the actual wording of the text displayed accurately represents the error code and the corresponding error description specified in the related ASC X12 acknowledgement specification without changing the meaning and intent of the error condition description.</li> </ul>
Phase IV CAQH CORE Benefit Enrollment and Maintenance Infrastructure Rule	A HIPAA-covered health plan or its agent must process the benefit enrollment and maintenance data by its enrollment application system <i>within five business days</i> following the successful receipt and validation of the data.
Phase IV CAQH CORE Payroll Deducted and Other Group Premium Payment for Insurance Products Infrastructure Rule	A HIPAA-covered health plan or its agent must process the Payroll Deducted and Other Group Premium Payment for Insurance Products data by its internal application system within five business days following the successful receipt and validation of the data.



# Safe Harbor Connectivity & Security Requirements



# Enables trading partners to use different communications and security methods than what is specified in rule:

- HIPAA covered entities must support CORE Connectivity Rule requirements for real time and batch processing modes.
- Can offer other communications and security methods.
- Does not require trading partners to deimplement any existing connectivity methods not compliant with CORE Connectivity Rule.

# **Polling Question #1**

Which stages of implementation of the Phase IV CAQH CORE Operating Rules are you planning to complete in 2016? (Select all that apply)

- 1. Internal Education and Awareness
- 2. Analysis and Planning/Systems Design
- 3. Systems Implementation/Integration and Testing
- 4. Deployment/Maintenance
- 5. N/A, we do not plan to implement in 2016



# Benefits and Business Case for Various Stakeholder Groups

Matthew Albright Senior Manager



# Benefits of Phase IV CAQH CORE Operating Rules

"These operating rules are an important step in moving the healthcare system from manual to electronic business transactions. When each entity in the process follows the operating rules, everyone benefits from reductions in costs, time and confusion."

-George S. Conklin, CORE Board Chair, Senior Vice President and Chief Information Officer, CHRISTUS Health

Phase IV CAQH CORE Operating Rules are a first step for these transactions, establishing key infrastructure; data content will be addressed in future phases.

# Implement the Phase IV CAQH CORE Voluntary Operating Rules in 2016

By implementing Phase IV CAQH CORE voluntary Operating Rules in 2016, your organization will:

- ✓ Establish your leadership in the industry as an early adopter.
- ✓ Determine your own timeline rather than a mandated one.
- ✓ Demonstrate your organization's commitment to administrative simplification.
- ✓ Build on work that has been implemented in previous Phases.



Early adoption means efficiencies for you and your customers will be realized sooner.

### **Specific Implementation Impacts:**

- ✓ Safe harbor connectivity allows you to conduct the transactions with any trading partner upon request – reducing trading partner onboarding.
- ✓ Use of digital certificate authentication improves security.
- Response time and acknowledgment requirements ensure nothing falls into a black hole.
- ✓ Use of the CG Template makes it easier to engage trading partners.
- ✓ Real time connectivity requirement specification lays the tracks for future development.

# Phase IV CAQH CORE Operating Rules Help Providers

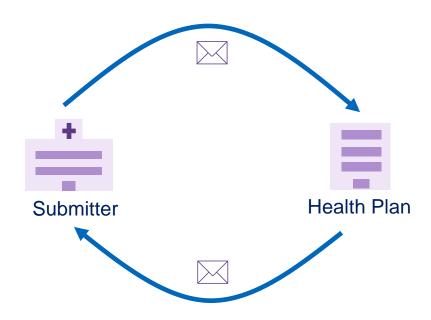
### Providers...

- ✓ ... can immediately learn if their claim submissions were successfully received by plan and moved into the adjudication system;
- ... can immediately learn whether the plan has received and is reviewing prior authorization request;
- ✓ ... are assured that PHI is transmitted through secure connectivity that meets the national standards;
- ✓ ... can connect online through CAQH CORE safe harbor for all of their transactions;
  and
- ... can improve coordination of benefits (COB) through more timely eligibility information from health plan and knowledge of plan's requirement for COB in their companion guide.

# Phase IV CAQH CORE Operating Rules Help Health Plans

## Health plans will have...

- ... an opportunity to build on investments already made in infrastructure for eligibility, claim status, EFT and ERA
- ... a common set of infrastructure rules across all transactions on which providers can rely including:
  - Secure connectivity
  - Standardized use of acknowledgements which decreases burden to help desks
  - Consistency in companion guide formats across all transactions
  - Consistency in system availability across all transactions
  - Common expectations around processing mode and response times for each transaction





# Polling Question #2:

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

- Fully understanding my organization's role and/or responsibility in the implementation process
- 2. Fully understanding the requirements of the Phase IV CAQH CORE Operating Rules
- 3. Overcoming resource constraints (i.e. time, staff, internal expertise)
- No major challenges we plan on implementing all/some of the Phase IV CAQH CORE Operating Rules
- 5. Not applicable



# Resources & Additional Information

# Phase IV CORE Certification

**Erin Weber** Associate Director

Matthew Albright Senior Manager



# Phase IV CAQH CORE Analysis & Planning Guide Assists in Understanding Applicability of Rules to Various Trading Partners

As with previous Phases, CAQH CORE now has an Analysis & Planning Guide for the Phase IV CAQH CORE Operating Rules



Planning Guide should be used by project staff to:

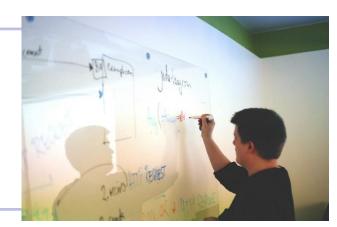
Understand applicability of the Phase IV CAQH CORE
Operating Rule requirements to organization's systems and
processes that conduct the transactions

*Identify all impacted external and internal systems* and outsourced vendors that process the transactions

**Conduct detailed rule requirements gap analysis** to identify system(s) that may require remediation and business processes which may be impacted

**Planning Guides includes three tools** to assist entities in completing analysis and planning:

- 1. Stakeholder & Business Type Evaluation
- 2. Systems Inventory & Impact Assessment Worksheet
- 3. Gap Analysis Worksheet



# Phase IV CAQH CORE Operating Rules Frequently Asked Questions (FAQ)

### New CAQH CORE FAQ Website

Includes more than 100 Phase IV FAQs addressing five Operating Rules and general concepts/questions



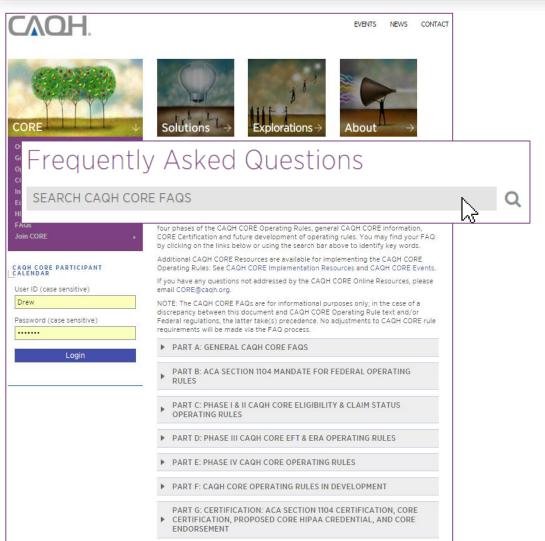
Newly revamped CAQH CORE FAQ website with searchable, web-based FAQs

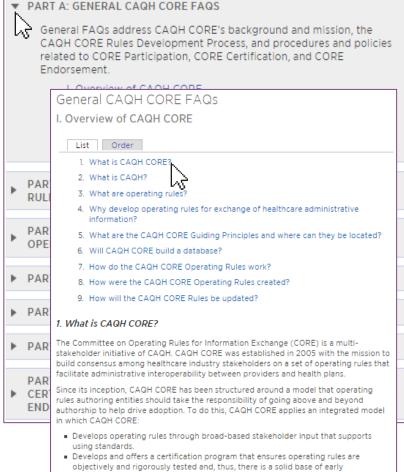
(No more PDFs!)

# New FAQ format will:

- Enable users to more quickly find answers to their questions
- Allow users to search only the CAQH CORE FAQs for keywords
- View in one place all FAQs available for a given Operating Rule

# **New CAQH CORE FAQ Website**





implementers.

Builds broad-based awareness of the operating rules.

· Provides in-depth, detailed technical knowledge and assistance through early

Promotes operating rules adoption by a majority of all stakeholders



# Voluntary CORE Certification Developed BY Industry, FOR Industry

CORE Certification is the most robust and widely-recognized industry program of its kind. Its approach assures an independent, industry-developed confirmation of conformance with operating rules and underlying standards:

- Requirements are developed by broad, multi-stakeholder industry representation through transparent discussion and polling process.
- Required conformance testing is conducted by third party testing vendors that are experts in EDI and testing.
- CAQH CORE serves as a neutral, non-commercial administrator:
  - Authorizes the conformance testing vendors.
  - Reviews and approves the Certification applications and conformance test reports before Certification Seal is awarded.

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# **Voluntary CORE Certification is Good for Business**

HEALTH PLANS	Providers	CLEARINGHOUSES	VENDOR SOLUTIONS

Conduct secure, timely, and streamlined electronic transactions.

Eliminate timeconsuming calls/paperwork

Increase patient

Add value for current customers and attract new customers.

Demonstrate conformance with federally mandated operating rules and underlying standards.

satisfaction through efficient patient services

Meet expectations: CORE Certification is becoming a trading partner contract expectation by health plans and providers.

Show that you are maximizing the efficiencies afforded by the operating rules and underlying standards.

Show that you are maximizing the efficiencies afforded by the operating rules and underlying standards.

Guarantee that your systems, products, or services are conformant with the operating rules and underlying standards.

Help your customers: CORE Certification allows your customers the value-add of "drafting" behind your certification and also becoming CORE-certified.

Achieve these goals through a process that uses industry-developed conformance requirements, a third-party tester, and a neutral, non-commercial administrator.

# Phase IV CORE Certification



# Be an industry leader and become Phase IV Certified in 2016!

As in previous Phases

°Health plans

°Clearinghouses

°Providers

°Vendor products

**\*Vendor solutions** 

can become CORE-Certified for Phase IV If you're a health plan, clearinghouse, provider, or if you have a product or solution that helps those entities conduct transactions, **be the first** of your competitors to be CORE-certified in the Phase IV CAQH CORE Operating Rules in late summer 2016!

**Contact** CORE@CAQH.org if you're interested, or if you have further questions about CORE Certification.



# Polling Question #3

What Phase IV CAQH CORE Operating Rule topics would you like to learn more about in future educational webinars?

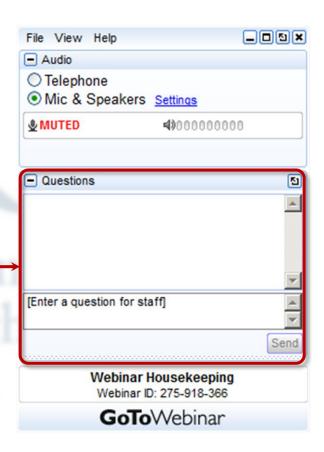
(Check all that apply)

- 1. CORE Safe Harbor Principle
- 2. Business Drivers of the Phase IV CAQH CORE Operating Rules
- 3. Phase IV CAQH CORE Operating Rule Implementation "How To"
- 4. Phase IV Certification
- 5. Open Mic Q&A

# Audience Q & A

# Please submit your questions

Enter your question into the "Questions" pane in the lower right hand corner of your screen.





# **Key Takeaways**

- ✓ The Phase IV CAQH CORE Voluntary Operating Rules build upon Phases I-III implementation.
- ✓ Phase IV CAQH CORE Operating Rules are a first step for these transactions, establishing key infrastructure; data content will be addressed in future phases.
- ✓ There is value in planning for implementation now.
- ✓ CAQH CORE is available to answer your questions and provide implementation resources for the Phase IV CAQH CORE Operating Rules as well as for Phases I-III.

# **Engage with CAQH CORE!**

# <u>CAQH CORE Website</u> or contact us at <u>CORE@CAQH.org</u>

Participate in the CAQH CORE
Code
Combinations
Task Group
(CCTG) or the Enrollment Data
Task Group

Become a

CAQH
CORE

Participating
Organization

Explore
Voluntary
CORE
Certification

Register for our educational webinars



# Dedicated webpages:

- ✓ Code Combination Maintenance
- ✓ <u>EFT/ERA Enrollment</u> <u>Maintenance</u>
- ✓ Voluntary CORE Certification
- ✓ CAQH CORE Phase IV
  Operating Rules
- ✓ <u>e-Learning Resources</u>



# Thank you for joining us!

Website: <a href="https://www.CAQH.org/CORE">www.CAQH.org/CORE</a>

Email: <a href="mailto:CORE@CAQH.org">CORE@CAQH.org</a>



Please take a moment to complete the post-webinar survey.