CAQH Committee on Operating Rules for Information Exchange (CORE)
CAQH CORE Technical Work Group (TWG)
TWG Ballot on Draft Phase V CAQH CORE Certification Test Suite: Ballot Results & Verbatim Comments
Posted to CAQH CORE Calendar

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1. Technical Work Group Ballot Background

The CAQH CORE Prior Authorization Subgroup (PASG) launched in Q4 2017 to develop potential draft operating rules that build on the foundational infrastructure requirements established by the Phase IV CAQH CORE 452 Health Care Services Review – Request for Review and Response (278) Infrastructure Rule, and move the needle closer to a more efficient prior authorization (PA) process.

In Q3 2018, the CAQH CORE Rules Work Group (RWG) launched to review the rules drafted by the PASG to continue development and refinement of the draft operating rules for the prior authorization process.

The following Draft Phase V Prior Authorization Operating Rules were approved by the Rules Work Group:

▪ Phase V CAQH CORE Prior Authorization (278) Request / Response Data Content Rule.
▪ Phase V CAQH CORE Prior Authorization Web Portal Rule.

Beginning in Q4 2018, the CAQH CORE Certification & Testing Subgroup (CTSG) launched to develop a test suite for the Draft Phase V CAQH CORE Prior Authorization Operating Rules. The rules were reviewed by CTSG participating organizations during the three calls held and were given a chance to provide feedback on each section of the test suite through straw poll. Based on feedback received during the straw poll process and follow-up subgroup discussion, the CAQH CORE Certification & Testing Subgroup reached agreement on an updated Draft Phase V CAQH CORE Certification Test Suite to forward to the Technical Work Group.

The CAQH CORE Technical Work Group (TWG) launched in Q1 2019 to review the Draft Phase V CAQH CORE Certification Test Suite. Upon reviewing the draft test suite, the TWG agreed to move the draft test suite forward to a formal Technical Work Group Ballot. The ballot was sent to the TWG on 02/06/2019 and closed 02/27/2019. Results were sent to the TWG via email on 02/28/2019. This document (posted to the CAQH CORE Calendar on 03/05/2019 contains the results of the ballot, as well as the deidentified comments submitted by responding organizations.

2. Technical Work Group Ballot Results

Per the CAQH CORE Voting Process, the following must occur at the Work Group level for approval of the Draft Phase V CAQH CORE Certification Test Suite:

- **Quorum Required for Ballot**: 60% of the Work Group.
- **Approval Required for Ballot**: Simple majority vote (50%)

2.1. Table 1: Summary of Respondents, by Stakeholder Breakdown

The ballot received feedback from **76%** of TWG participating organizations, **comprising 22 unique organizations**, meeting the required quorum.

Number of Work Group Participating Entities	29
Total Number of Individual Responses	**22 (76% of Technical Work Group Participating Entities)**
Number of Provider/Provider Association Responses	5 (23% of respondents)
Number of Health Plan/Health Plan Association Responses	10 (45% of respondents)
Number of Clearinghouse and Vendor Responses	2 (9% of respondents)
Number of Government Responses	2 (9% of respondents)
Number of Other Stakeholder Type Responses	3 (14% of respondents)

2.2. Table 2: Summary of Responses on the TWG Ballot

The Draft Phase V CAQH CORE Certification Test Suite was "Approved" as it received greater than the 50% necessary support.

	Draft Phase V CAQH CORE Certification Test Suite
Number of "Approve" Responses	17 (89%)
Number of "Disapprove" Responses	2 (11%)
Number of Abstain Responses	3
Total Number of Responses	22

Note: Abstentions are not included in the percentage calculations for Approve/Disapprove.

2.3. Table 3: Summary of Responses on the Draft Phase V CAQH CORE Certification Test Suite, by Stakeholder Type

	Provider/Provider Association	*Health Plan/Health Plan Association*	*Vendor / Clearinghouse*	*Government*	*Other*
Number of "Approve" Responses	3 (60%)	9 (100%)	1 (100%)	2 (100%)	2 (100%)
Number of "Disapprove" Responses	2 (40%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
Number of Abstain Responses	0	1	1	0	1
Total Number of Responses	5	10	2	2	3

Note: Abstentions are not included in the percentage calculations for Approve/Disapprove.

3. Verbatim Comments Received from TWG Ballot on Draft Phase V CAQH CORE Certification Test Suite

The following tables contain all ballot comments received on the Draft Phase V CAQH CORE Certification Test Suite. **Table 5** contains Point of Clarification Comments received and **Table 6** contains Non-Substantive Comments received.

Classification of Comments

- **Points of Clarification (Table 5):** Pertain to areas where more education is required given the scope of the rules has been established and approved at the Technical Work Group vote. FAQs for the test suite and rules will be written and available on CAQH CORE website to assist with implementation. Additionally, CAQH CORE participants may contact CAQH CORE staff with immediate questions.

- **Non-substantive comments (Table 6):** Pertain to typographical/grammatical errors, wordsmithing, etc. **ACTION:** Non-substantive adjustments made are also highlighted in grey in this document and the draft test suite.

Note: No substantive comments were received on the TWG Ballot.

3.1. Table 5: Point of Clarification Comments Received on Draft Phase V CAQH CORE Certification Test Suite

Section #	Section Title	Comments	CAQH CORE Response
All	All Sections	- We have 21 comments total for all 3 parts of this ballot. - For Ballot Draft Phase V CAQH CORE Certification Test Suite (13 comments): **p.19**, #1. Why is the text different from the text in the Rule? "Must include HCR01 AND LOINC AND PWK"? **p.19**, #2. Should this read: "...and/or..."? **p.20**, #3. Why is the text different from the text in the Rule? "Must include HCR01 AND LOINC AND PWK"? **p.20**,#4. Should this read: "...and/or..."? **p.20**, #5. Why is the text different from the text in the Rule? "Must include HCR01 AND LOINC AND PWK"? **p.24**, #6. Should this read: "...and/or..."? **p.24**, #7. Why is the Criteria different from the text in the Rule? "Must include HCR01 AND LOINC AND PWK"? Why is the Expected Result text different from the Criteria text? **p.26** #8. Should this read: "...and/or..."? **p.26**,#9. Why is the Criteria different from the text in the Rule? "Must include HCR01 AND LOINC AND PWK"? **p.26**, #10. Should this read: "...and/or..."? **p.26**, #11. Why is the Criteria different from the text in the Rule? "Must include HCR01 AND LOINC AND PWK"? **p.28,** #12. Again, this seems to indicate a 278 is to be created from the data entered into the web portal - this was not the intent during our conference calls. **p.31**, #13. Again, this seems to indicate a 278 response is to be created from the data entered into the web portal - this was not the intent during our conference calls. - For the DRAFT Phase V CAQH CORE Prior Authorization Web Portal Rule (2 comments):	**Do not adjust.** CAQH CORE will provide additional guidance on this topic as part of the Phase V implementation process.

Section #	Section Title	Comments	CAQH CORE Response
		▪ **p.10, Line 276**, #1. The referral is out of scope on the Data Content Rule, but in-scope on the Web Portal Rule? ▪ **p.10, Line 280**, #2. The referral is out of scope on the Data Content Rule, but in-scope on the Web Portal Rule? ○ For the DRAFT Phase V CAQH CORE Prior Authorization (278) Request / Response Data Content Rule (6 comments): ▪ **p.3, Line 41**, #1. Does this mean we are supposed to create a 278 transaction from the web portal data submitted by the Provider? Not what the committee discussed. A vendor may accept web portal data and generate an outbound 278 to the Payer; however, the Payer will not generate a 278 within its own portal. ▪ **p.6, Line 130,** #2. Do both "...clinical and administrative systems..." refer to the systems in use at the Provider? ▪ **p.9, Line 269**, #3. This appears to suggest that a 278 is created from the web portal data entered by the submitter - is that the interpretation we should use? ▪ **p.10, Line 290-291**, #4. This seems to contradict the statement above at lines 276 through 278. ▪ **p.10, Line 295**, #5. Is this referencing the 217 only? ▪ **p.14, Line 402 through 406**, #6. Need to clarify this line - unclear what it means: should Line #406 actually precede line #402?	

3.2. Table 6: Non-Substantive Comments Received on Draft Phase V CAQH CORE Certification Test Suite

Section #	Section Title	Comments	CAQH CORE Response
All	All Sections	• We continue to urge the inclusion of a maximum response time to the Phase V rule and oppose the inclusion of rules for web portal use of prior authorization transactions.	• **Do not adjust.**
All	All Sections	• We appreciate all of the time and resources that CAQH CORE has invested in the development of the Phase V Test Suite. However, as noted in our response to the previous straw poll, we strongly believe that the Phase V suite should be divided into subsections based on the Data Content and Web Portal rules. We have expressed our concerns over the Phase V Web Portal ad nauseum throughout the Phase V rule development process, so we won't rehash those points	• **Do not adjust.**

Section #	Section Title	Comments	CAQH CORE Response
		here. However, given the fact that none of the certification criteria for web portals apply to providers (as indicated in the test scripts) -- and given the fact that portals are indeed quite burdensome to provider users -- we object to a program that will "certify" providers on portals, when there is no basis to evaluate providers on web portals and that these tools are actually often provider-unfriendly. We again urge CAQH CORE to split the certification suite into Phase VA and VB (Data Content and Web Portals) to reflect the very different natures of the two Phase V rules.	
3.4		• Section 3.4 of testing suite: #2 mentions Test Scripts #3- #17 in the criteria and expected result, should this be through #14 since there are only 14 test scripts?	• **Adjust.**