

**CAQH Committee on Operating Rules for Information Exchange (CORE)
 CAQH CORE Attachments Subgroup – Prior Authorization Use Case (ASG-PA)
 ASG-PA Straw Poll #1 Results**

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1. Overview

1.1 Background

The CAQH CORE Attachments Subgroup – Prior Authorization Use Case (ASG-PA), launched July 2020 with an **initial focus on the electronic exchange of attachments for prior authorization**. The Attachments Subgroup, focusing on prior authorization as the first use case, will build on CAQH CORE Prior Authorization Operating Rules and evaluate opportunities identified and prioritized by the CAQH CORE Attachments Advisory Group with the ultimate goal of developing draft operating rule requirements.

On its 07/23/20 call, members of the ASG-PA reviewed and discussed potentially seven opportunity areas in preparation to complete the first ASG-PA feedback form. The first feedback form evaluated each opportunity area and potential rule options to pursue.

On its 10/01/20 call, the ASG-PA reviewed the results of the feedback form and discussed substantive and point of clarification comments submitted by subgroup participants. Given the high support for pursuing all seven opportunity areas presented on the feedback form, the subgroup decided to move forward with developing draft requirements for the opportunity areas.

On its 11/05/20 call, the ASG-PA reviewed draft infrastructure and data content requirements, in preparation for ASG-PA Straw Poll #1.

1.2 Format of Straw Poll

The ASG-PA Straw Poll #1 was separated into three distinct parts (described below). Within each part, ASG-PA participants reviewed specific draft requirements for each opportunity area listed and, in some cases, were asked follow-up questions for additional feedback on the draft requirements. Additionally, there were **four technical scenarios** that could apply to an opportunity area. These technical scenarios are described below and were included prior to each individual straw poll question for reference.

NOTE: Some draft requirements pertaining to the X12 275 scenario were further developed than draft requirements pertaining to the non-X12 275 and hybrid scenarios. Additional feedback and subgroup discussion are necessary in this call to develop potential draft requirements for these scenarios; some may be further addressed and defined within the claims attachments subgroup – which launches in early 2021.

Technical Scenarios Addressed by the Draft Requirements:

1. Requirements that apply to **X12 275** technical scenarios.
2. Requirements that apply to **Non-X12 275** technical scenarios.
3. Requirements that connect X12 and Non-X12 technical scenarios (defined as **hybrid** scenarios).
4. Requirements that apply to **both X12 and Non-X12 275** technical scenarios.

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Items reviewed, listed in the order they appeared in the straw poll:

- **PART A: Draft CAQH CORE Attachments (Prior Authorization Use Case) Infrastructure Requirements**
 - Draft System Availability & Reporting Requirements (*X12 275 & Non-X12 275 scenarios*)
 - Draft Payload Acknowledgement and Response Time Requirements (*X12 275 scenario only*)
 - Draft File Size Requirements (*X12 275 & Non-X12 275 scenarios*)
 - Draft Policy Access and Identification Requirements (*X12 275 & Non-X12 275 scenarios*)
 - Draft Master Companion Guide (*X12 275 scenario only*)

- **PART B: Draft CAQH CORE Attachments (Prior Authorization Use Case) Data Content Requirements**
 - Draft Data Error Handling Requirements (*X12 275 scenario only*)
 - Draft Reassociation Requirements (*X12 275, Non-X12 275 and hybrid scenarios*)

- **PART C: Feedback on HL7 C-CDA**
 - Initial feedback on HL7 C-CDA in Draft Requirements (*Non-X12 275 & hybrid scenarios*)

2. Summary of Straw Poll Respondents

Responses were received from **37** respondents representing **70%** of ASG-PA participating organizations.

Total Number of Individual Responses	37 (70% of the ASG-PA)
Number of Provider / Provider Association Responses	8 (22% of respondents)
Number of Health Plan / Health Plan Association Responses	12 (32% of respondents)
Number of Vendor / Clearinghouse Responses	12 (32% of respondents)
Number of Government / 'Other' (Includes standards organizations) Responses	5 (14% of respondents)

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3. Percent Support for Draft CAQH CORE Attachments (Prior Authorization Use Case) Infrastructure Rule Requirements (Part A)

When the straw poll closed on Friday, 12/4/20, each Draft Infrastructure Rule Requirement received at least **82% support**, as shown in Table 1 below.

Table 1. Percent Support for Draft CAQH CORE Attachments (Prior Authorization Use Case) Infrastructure Rule Requirements

#	Part A: Support for Draft CAQH CORE Attachments (Prior Authorization Use Case) Infrastructure Rule Requirements	Support (%)	Do Not Support (%)	Abstain
Percent support for Draft System Availability & Reporting Requirements				
1	System availability must be no less than 86% per calendar week for both Real-Time and Batch Processing Modes.	28 (82%)	6 (18%)	3
2	System Availability Reporting Requirements: Scheduled Downtime, Non-Routine Downtime, No Response Required, and Holiday Schedule.	32 (91%)	3 (9%)	2
Percent support for Draft Payload Acknowledgement & Response Time Requirements				
3	Use of the X12 999 to acknowledge receipt of X12 v6020 275 (Batch Processing Mode).	29 (94%)	2 (6%)	6
4	Use of the X12 999 to acknowledge receipt of X12 v6020 275 (Real-Time Processing Mode).	29 (91%)	3 (9%)	5
Percent support for Draft File Size Requirements				
5	Minimum sizing requirement that front-end servers must be able to minimally accept is 64MB of Base64 encoded data in the Binary Data Segment.	30 (94%)	2 (6%)	5
6	Minimum sizing requirement that internal document management systems must be able to minimally accept is 64MB file size documents.	29 (91%)	3 (9%)	5
Percent support for Draft Electronic Policy Access Requirements				
7	Electronic Means of identifying policies and lists of attachment-specific information.	29 (85%)	5 (15%)	3
Percent support for Draft Master Companion Guide Requirements				
8	Master Companion Guide Template.	33 (100%)	0 (0%)	4

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4. Percent Support for *Draft CAQH CORE Attachments (Prior Authorization Use Case) Data Content Rule Requirements (Part B)*

When the straw poll closed on Friday, 12/4/20, each Draft Data Content Rule Requirement received at least **70% support**, as shown in Table 2 below.

Table 2. Draft CAQH CORE Attachments (Prior Authorization Use Case) Data Content Rule Requirements (Part B)

#	Part B: Draft CAQH CORE Attachments (PA Use Case) Data Content Rule Requirements	Support (%)	Do Not Support (%)	Abstain
Percent Support for Draft Data Error Handling Requirements				
1	Draft Data Error Handling Requirements (Batch Processing Mode).	29 (97%)	1 (3%)	7
2	Draft Data Error Handling Requirements (Real-time Processing Mode).	29 (91%)	3 (9%)	5
Percent Support for Draft Reassociation Requirements				
3	Use of Code EL-Electronically Only in Segment PWK02 of 278.	30 (97%)	1 (3%)	6
4	Use of Code AA-Available on Request at Provider Site in Segment PWK02 of 278.	21 (70%)	9 (30%)	7
5	Use of MSG Segment of 278.	21 (72%)	8 (28%)	8

5. Percent Support for *Inclusion of HL7 C-CDA (Part C)*

When the straw poll closed on Friday, 12/4/20, inclusion of HL7 C-CDA in the draft requirements received **97% support**, as shown in Table 3 below.

Table 3. Feedback on HL7 C-CDA

#	Part C: Inclusion of HL7 C-CDA	Support (%)	Do Not Support (%)	Abstain
Feedback on HL7 C-CDA				
1	Inclusion of draft HL7 C-CDA requirements.	28 (97%)	1 (3%)	8

6. Summary of ASG-PA Straw Poll Comments Received

Respondents were given the opportunity to provide comments on each of the questions asked on the straw poll. As always, three categories of comments were received:

1. **Points of Clarification** – Pertain to areas where more explanation for the Subgroup is required; *may* require adjustments to the draft rules, which do not change rule requirements.
2. **Substantive Comments** – May impact rule requirements; some comments require Subgroup discussion on suggested adjustments to the draft requirements.
3. **Non-substantive Comments** – Pertain to typographical/grammatical errors, wordsmithing, clarifying language, addition of references; do not impact rule requirements. Non-substantive comments do not require Subgroup discussion, CAQH CORE staff will make these adjustments to the requirements, as necessary. **NOTE:** We will not be reviewing these comments on today’s call, but they are available in the Appendix A of this document for offline review. Please be sure to review these comments as there are several adjustments for clarity included in this section.

The tables below summarize substantive comments and points of clarification submitted by ASG-PA Straw Poll respondents. For substantive comments, the table includes ASG-PA Co-Chair and staff recommendations, but discussion on these comments is encouraged.

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7. Comments Received on ASG-PA Straw Poll #1 Part A: Draft CAQH CORE Attachments (Prior Authorization Use Case) Infrastructure Rule Requirements (Part A)

Table 4 below summarizes points of clarification and substantive comments received from ASG-PA Straw Poll respondents pertaining to Part A: Draft CAQH CORE Attachments (Prior Authorization Use Case) Infrastructure Rule Requirements along with CAQH CORE ASG-PA Co-chair and staff responses. **Non-substantive comments are available in Appendix A of this document for offline review.**

Table 4. Comments Received on Part A: Draft CAQH CORE Attachments (PA Use Case) Infrastructure Requirements

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-Chair & Staff Response
Points of Clarification			
1	Versioning – Applies to all sections of the draft rule	<p>Three comments were received from two entities pertaining to transaction versioning in the Draft CAQH CORE Attachments (Prior Authorization Use Case) Rules.</p> <ul style="list-style-type: none"> - One entity noted they only support v5010 EDI specifications including for the X12 275 transaction and do not plan to implement v6020 or v7030 until they are mandated. - Another commented they believed X12 v7030 275 would be a better fit for a CAQH CORE Attachments Operating Rule. - They also stated that due to lack of adoption of X12 v6020 275, (as other healthcare transactions use v5010 275) CAQH CORE should specify v5010 275 and its respective X12 999 transaction until v7030 275 is published. 	<p>Do not adjust. CORE ASG-PA Co-chairs and staff recommend specifying X12 v6020X316 275 in alignment with previous X12 recommendations to NCVHS.</p> <p>The X12 v5010X 275 TR3 contains the BIN segment, not the BDS segment which is in the X12 v6020 275. The BIN segment does not support the necessary data to meet the specific business needs articulated by the ASG-PA, thus the X12 v5010 275 is not a viable option for the Draft CAQH CORE Attachments Operating Rules. Furthermore, any potential CAQH CORE Operating Rules can only be developed for published versions of standards and the X12 v7030 275 is currently in development, not published.</p> <p>CAQH CORE has drafted these requirements for the X12 v6020X316 275 and the associated X12 v6020X290 999 transaction. CAQH CORE has a detailed maintenance process to update CAQH CORE Operating Rules when new versions are made available and when HHS designates them for mandate.</p>

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#	Section	Summary of Comments	CAQH CORE ASG-PA Co-Chair & Staff Response
Points of Clarification Pertaining to Draft System Availability & Reporting Requirements			
2	Draft System Availability & Reporting Requirements	<p>Two entities asked for clarification on how CAQH CORE measures conformance to the system availability requirements.</p> <ul style="list-style-type: none"> - One asked how availability was verified. - Another explained that their organization operates across several different time zones and suggested keeping the different time zones mind. - They also noted that their organization measures system availability to external entities quarterly and explained that at their organization, scheduled downtimes are set on a calendar year basis and may vary significantly from week-to-week. 	<p>The CAQH CORE process centers on an integrated model consisting of rule development, education, testing/certification, and measuring/tracking. For CORE Certification, a test suite of each operating rule is created to test conformance to the rule requirements. Similar requirements will be drafted for the conduct of the v6020 275 as we have for other X12 transactions in other CAQH CORE Operating Rules. For example, in the CAQH CORE Prior Authorization & Referral Operating Rule, which requires system availability at 86% and reporting of similar scheduled, non-routine, and unscheduled downtimes, the CORE Certification Test Suite requires participants to submit:</p> <ul style="list-style-type: none"> - Actual published copies of regularly scheduled downtime, including holidays and method(s) of publishing. - A sample notice of non-routine downtime, including schedule of downtime and method(s) of publishing. - A sample notice of unscheduled/emergency downtime, including method(s) of publishing.

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3	Draft System Availability & Reporting Requirements	<p>Four entities commented on the system availability reporting requirements of both scheduled and unscheduled downtimes.</p> <ul style="list-style-type: none"> - Two of these entities explained systems should respond with an out-of-service message when they are not available. - Another explained that no response during scheduled, non-routine, or unscheduled downtimes would not be acceptable. - Another entity asked for clarification on how unscheduled downtime impacts the 86% system availability. - Another asked for clarification on how holiday schedules affect health plan systems' availability to accept attachments. - Another stated that the requirement supports reasonable uptime, while still allowing platform updates up to one day per week. However, they asked for confirmation that downtimes <i>must</i> be scheduled, and that the requirement does not pertain to unscheduled outages. 	<p>Do not adjust. The draft system availability requirements include a non-response requirement during scheduled, non-routine, or unscheduled downtimes given systems are not able to feasibly be accessed when the system is not available to display or publish it is down. For example, an indicator of a system being unavailable would be an appropriate Hypertext Transfer Protocol (HTTP) response status code.</p> <p>NOTE: If a system is down due to system outage, there is no way to redirect users to an alternative method. Specifying a method for health plans to communicate to providers how to submit a prior authorization during down periods is outside the scope of this rule.</p>
Points of Clarification Pertaining to Draft Payload Acknowledgement & Response Time Requirements			
4	Draft Payload Acknowledgement and Response Time Requirements – Batch & Real Time	<ul style="list-style-type: none"> - Two entities asked for clarification as to when the 10% exception to the required response times apply. - Another commented that the percentage for exceptions should be reduced to 1% or less. - Another noted that under the current language, a health plan could choose to not send an acknowledgement 10% of the time and still be compliant in real-time and batch mode. 	<p>Do not adjust. The draft payload acknowledgement requirements include a note stating “Each HIPAA-covered entity and its agent only needs to support the maximum response time in 90% of cases per calendar month” to account system malfunctions and unplanned system outages. This exception is consistent across all CAQH CORE Operating Rules for acknowledgements at the payload level and reflects the understanding throughout the industry that there may be instances where adherence to the response time requirements is not feasible due to the complexity of the submission.</p> <p>Additional research on industry readiness for an increase in system availability will be conducted and pursued in a future CAQH CORE Infrastructure Update that would address all interactions for which CAQH CORE Operating Rules have been developed.</p>

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#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
5	Draft Payload Acknowledgement and Response Time Requirements – Real Time	One entity clarified their response to the draft payload acknowledgement and response time requirements stating that given the number of intermediaries involved in the transmissions from vendors to clearinghouses and the varying attachment types and sizes, response times would be varied and may not reasonably meet the 20 second requirement.	<p>Do not adjust. Given 91% of ASG-PA Respondents supported the draft rule requirement, as written, and 20 second real-time response is consistent with all prior CAQH CORE Infrastructure Rules, CAQH CORE ASG-PA Co-chairs and staff recommend not adjusting the 20 second response time requirement.</p> <p>Additionally, the draft requirement pertains only to acknowledgements at the payload or interchange layer and would not require a detailed response of the data content within the attachment. The draft requirement recommends that each hop between trading partners last no more than 4 seconds.</p>
Points of Clarification Pertaining to Draft File Size Requirements			
6	Draft File Size Requirements – Internal Document Management Systems	<p>Two entities questioned whether CAQH CORE <i>should</i> write rule requirements pertaining to file size.</p> <ul style="list-style-type: none"> - One of these entities stated that this requirement is an overreach of an EDI operating rule and should not apply to an entity's internal processing system. - The other commented that file sizes should be negotiable between trading partners due to the numerous legacy systems that are still in use. 	<p>Given the draft internal document management system requirements received 91% support from ASG-PA Straw Poll Respondents, CAQH CORE Co-chairs and staff recommend including these requirements in the Draft CAQH CORE Attachments (PA Use Case) Infrastructure Rule.</p> <p>Trading partners may continue to negotiate file sizes above 64MB, but health plans and their agents would be required to have the capability to accept 64MB at a minimum. Smaller file sizes may also be accepted.</p>

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#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
7	Draft File Size Requirements – Front End Servers & Internal Document Management Systems	<p>Five entities asked for clarification on the 64MB file size requirements.</p> <ul style="list-style-type: none"> - Two entities recommended re-wording the requirements for additional clarity. They also asked if the requirement intended to specify that a health plan cannot accept file sizes smaller than 64MB. - Two entities questioned the applicability to non-X12 methods of exchange asked whether 64MB is sufficient to meet industry needs. - One entity stated that 64MB limits for payloads would be workable if there is a way to associate additional X12 275 transactions with the original request. They further explained that there is also a need to associate non-X12 methods of exchange such as DVDs, mail and fax to original requests. 	<p>Given 94% of ASG-PA Straw Poll Respondents supported the draft front-end server file size requirements and 91% of ASG-PA Straw Poll Respondents supported the draft internal document management file size requirements, CAQH CORE ASG-PA Co-chairs and staff recommend not adjusting the 64MB minimum limit. However, there are minor adjustments for clarity that are recommended:</p> <p>Adjust for clarity. CAQH CORE ASG-PA Co-chairs and staff recommend adjusting the draft file size requirements to clarify that front-end server file size requirements apply to both X12-based (i.e., X12 275) and non-X12-based scenarios.</p> <p>Like prior CAQH CORE Operating Rule requirements, this potential rule option represents a floor and not a ceiling in terms of the file size an organization can accept for processing. Entities may choose to accept file sizes above 64MB, but they must at a minimum accept at least as large as 64MB. Smaller file sizes can be accepted. CAQH CORE conducted extensive research and straw polling on the topic prior to the launch of the ASG-PA through environmental scanning and through the CAQH CORE Attachment Advisory Committee and will continue to conduct research on the file size, as necessary.</p>

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#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
Substantive Comments			
Substantive Comments Pertaining to Draft System Availability & Reporting Requirements			
8	Draft System Availability & System Reporting Requirements	<p>Seven entities commented that 86% system availability is too low. Two of these entities provided additional context to their comments:</p> <ul style="list-style-type: none"> - One entity explained that having the process fail 14% of the time in the worst case is not acceptable. - Another entity noted that their organization only closes six days out of the year and therefore it is critical that health plan systems are available for real-time transactions. <p>NOTE: Eight entities expressed their support for the rule option of 86% in the comments (see Appendix A, non-substantive comments).</p>	<p>For ASG-PA Discussion. Given 82% of ASG-PA straw poll respondents voted in support of the draft system availability requirement, CAQH CORE ASG-PA Co-chairs and staff recommend continuing to support the system availability requirement as drafted to remain consistent with other CAQH CORE Operating Rules.</p> <p>Additional research on industry readiness for an increase in system availability will be conducted and pursued in a future CAQH CORE Infrastructure Update that would address all interactions for which CAQH CORE Operating Rules have been developed.</p>
9	Draft System Availability & Reporting Requirements	<p>One entity stated that non-X12 275 scenarios should be held to a higher standard of system availability and explained that advanced solutions can and should withstand more advanced requirements such as operating rules that address HL7 FHIR-based exchanges (i.e., scenarios involving “FAST” Healthcare Interoperability Resources).</p> <p>The same entity asked for clarification on how the system availability reporting requirements would be applied to non-X12 methods of exchange.</p>	<p>Adjust for clarity. CAQH CORE ASG-PA Co-chairs and staff recommend removing “<i>System is defined as all necessary components required to process an X12 v6020X316 275 Additional Information and an X12 v6020X290 999 transaction</i>”.</p> <p>The adjusted language will be written to broaden the applicability of the requirement to non-X12 exchanged technical scenarios. Systems that process transactions in real-time mode via a variety of connectivity methods (SOAP, RESTful, HL7 FHIR, etc.) should have consistent availability and reporting requirements.</p>

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#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
Substantive Comments Pertaining to Draft Electronic Policy Access Requirements			
10	Draft Electronic Policy Access Requirements	<p>Eight entities commented on the difficulty associated with implementing the draft electronic access requirement:</p> <ul style="list-style-type: none"> - Two entities stated that given the variance in medical policies based on member plans, it would be a challenge to quantify requirements or policies for authorization types. - Two different entities recommended that the subgroup codify specific components of the medical record. They also noted that the draft requirements may need to reference a standard medical record nomenclature. - Another stated that because attachments are often required based on medical policy, this rule would necessitate integration with medical policies and would only be applicable in an unsolicited scenario. They further explained that solicited scenarios would be driven by the rendered decision on the prior authorization when its pended or denied for lack of information/documentation. - Another explained that health plans may not have specific “attachments” that must be supplied in order support prior authorization or claim, but there may be clinical criteria to describe the type of information, such as test results or clinical findings. - Another suggested that CAQH CORE ASG-PA Co-chairs and staff consider cross-referencing the CAQH CORE 278 Data Content Rule, which requires plans to indicate clinical documentation requirements for certain service types in the 278 response via LOINC or PWK segments. - Another recommended adjusting the draft requirement language to include: <i>“information about any necessary supporting attachments should also be available at the level of service requiring prior authorization and be readily and easily accessible by providers as they carry out prior authorization workflows.”</i> 	<p>For ASG-PA Discussion.</p> <p>CAQH CORE ASG-PA Co-chairs and staff recommend removing the draft language for these requirements and coordinating with various organizations to develop industry education and best practices to ensure that providers have the ability to inquire on specific attachment and data needs to facilitate the PA process and that health plans support these needs in an efficient method. CAQH CORE is committed to resolving provider abrasion in this area.</p>

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8. Comments Received on Part B: *Draft CAQH CORE Attachments (PA Use Case) Data Content Rule Requirements*

Table 5 below summarizes comments received from ASG-PA Straw Poll respondents pertaining to the *Draft CAQH CORE Attachments (PA Use Case) Data Content Rule Requirements*, along with CAQH CORE ASG-PA Co-chair & staff responses. **Non-substantive comments are available in Appendix A for offline review.**

Table 5. Comments Received on Part B: *Draft CAQH CORE Attachments (PA Use Case) Data Content Requirements*

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
Points of Clarification			
Points of Clarification Pertaining to Draft Data Error Handling Requirements			
11	Draft Data Error Handling Requirements – <i>Batch & Real Time</i>	One entity asked if the subgroup would consider API standards (i.e., RESTful APIs) instead of SOAP. They also asked for clarification as to whether SOAP was chosen due to enforcement of standardization or if it was mandated by another publication/rule set.	Do not adjust. The recently updated CAQH CORE Connectivity Rule vC4.0.0 includes requirements for the exchange of messages using both SOAP and REST. Figure #1 depicted in the ASG-PA Straw Poll was only an example of the different data error handling processing layers using SOAP. The Draft CAQH CORE Attachments (PA Use Case) Data Content Rule, using CAQH CORE Connectivity supports the use of SOAP and REST.
12	Draft Data Error Handling Requirements – <i>Batch & Real Time</i>	Two entities commented on the role of error reporting at the data level versus reporting errors at the payload or transaction level (i.e., X12 278). <ul style="list-style-type: none"> - One entity explained that the draft data error handling requirements should be written in a way that does not preclude layers from reporting errors independently, for example, if a X12 v6020 824 is also generated. - Another asked CAQH CORE ASG-PA co-chairs and staff to consider modifying the draft language from “<i>must return</i>” to “<i>should return</i>” explaining that the X12 v5010 278 Response can also be used to validate data content in most situations using the AAA segment. 	Adjust for Clarity. CAQH CORE ASG-PA Co-chairs and staff recommend adjusting the draft requirement language to clarify the usage of the X12 v6020 824 and that it is independent from other X12 responses to the X12 v5010 278 Response and X12 v6020 999. The X12 v6020 824 may be used for both acceptance of the X12 275 or its rejection. Through extensive research, it was determined that providers are often not aware of whether the attachment sent to support a prior authorization request was received or not. Given the X12 v6020 275 transaction does not have an associated response transaction to return errors at the data content layer, CAQH CORE ASG-PA Co-chairs and staff recommend the Draft CAQH CORE Attachments (PA Use Case) Data Content Rule continue to require the use of the X12 v6020 824 for all attachments sent via X12 v6020 275 for such purposes.

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Points of Clarification Pertaining to Draft Reassociation Requirements			
13	Draft Reassociation Requirements – Use of PWK Code EL	<p>One entity explained that, as written, the draft requirement language for the use of PWK Code EL in the X12 278 Response implies that health plans may require providers to submit documentation only via the X12 278 transaction, which may not be the providers preferred method.</p> <p>They also noted that once a health plan requests additional documentation, related attachments are no longer “unsolicited” and therefore fall outside the scope of the depicted ‘unsolicited’ scenario.</p>	<p>Adjust for clarity. CAQH CORE ASG-PA Co-chairs and staff will adjust the draft reassociation requirements related to the use of PWK Code EL to clarify that providers may submit documentation using alternative methods as detailed by the health plan – through other supported means (e.g., other attachment standards including HL7 C-CDA, .pdf, etc.) and other electronic submission modes (e.g., CORE Connectivity, REST, HL7 FHIR, etc.).</p>
14	Feedback on HL7 C-CDA	<p>One entity noted that the addition of HL7 C-CDA could be liability to the payer as data elements within HL7 C-CDA could fall within the USCDI, and become data maintained by the payer.</p> <p>NOTE: Eight entities commented explaining their support for the inclusion of HL7 C-CDA (see Appendix A, non-substantive comments).</p>	<p>Do not adjust. Given 97% of ASG-PA Straw Poll Respondents supported including HL7 C-CDA in the draft rule, CAQH CORE ASG-PA Co-chairs and staff recommend moving forward with the inclusion of a draft HL7 C-CDA requirement. CAQH CORE staff will continue conducting research on non-X12 275 scenarios and will adjust the rule requirements as needed for clarity (See Table 4 in Appendix B).</p>

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#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
Substantive Comments			
Substantive Comments Pertaining to Draft Reassociation Requirements			
15	Draft Reassociation Requirements – Use of code AA in PWK Segment & MSG Segment	<p>Eight entities commented on the use of codes in the PWK segment to notify health plans an unsolicited attachment was sent for non-X12 275 exchanged attachments and explained there would be no value added in the use of Code AA in the PWK segment of the X12 5010 278 Request.</p> <ul style="list-style-type: none"> - Six entities also sought clarification as to whether the use of PWK Code AA meant health plans would get access to provider systems. - Another stated that it is difficult to pursue PWK dependencies for non-X12 275 exchanged attachments. They explained that because the X12 v6020 275 transaction is not HIPAA-mandated, there is nothing that requires that the content must be the same using a non-X12 275 format. Therefore, the data will not necessarily be shared in the non-X12 275 exchanged attachment with the X21 v5010 278 codes or content. 	For ASG-PA Discussion. Given only 70% of the subgroup voted in support of the use of PWK Code AA, CAQH CORE ASG-PA Co-chairs and staff recommend removing the requirements from the draft rule and conducting further research on the topic prior to further ASG-PA discussion.
16	Draft Reassociation Requirements – Use of MSG Segment	Twelve entities noted the MSG segment required standardization and was not a preferred choice to reassociate non-x12 additional information with the X12 278 Request.	For ASG-PA Discussion. Given only 72% of the subgroup voted in support of the use of MSG segment, CAQH CORE ASG-PA Co-chairs and staff recommend removing the requirements from the draft rule and conducting further research on the topic prior to further ASG-PA discussion.

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9. Next Steps

- **CAQH CORE ASG-PA Co-Chairs and staff will:**
 - Continue to monitor and track [CMS' Prior Authorization API NPRM](#) and communicate relevant information to the subgroup.
 - Adjust the Draft CAQH CORE Attachment Rule Requirements in accordance with Subgroup discussion on today's call and continue to conduct further research on key topics
 - Draft a call summary for today's call.

- **Attachments Subgroup (PA Use Case) participants will:**
 - Plan to attend the 5th ASG-PA call on **Thursday, 1/28/21 from 2:30pm – 4pm.**
 - Stay engaged by attending [CAQH CORE's Town Hall](#) on **Wednesday, 01/20/21 2:00 – 3:300 PM ET.**

For ASG-PA Discussion Only

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10. Appendix A: Non-Substantive Comments

Appendix A consists of tables summarizing non-substantive comments received on each Part of the ASG-PA Straw Poll for offline review.

10.1 Non-Substantive Comments Received on Part A: *Draft CAQH CORE Attachments (PA Use Case) Infrastructure Rule Requirements*

Table 6 below summarizes non-substantive comments received from ASG-PA Straw Poll respondents pertaining to Part A: *Draft CAQH CORE Attachments (PA Use Case) Infrastructure Rule Requirements* along with CAQH CORE ASG-PA Co-chair and staff response, when applicable.

Table 6: Non-Substantive Comments Received on Part A: *Draft CAQH CORE Attachments (PA Use Case) Infrastructure Rule Requirements*

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
Non-substantive Comments Pertaining to Draft System Availability & Reporting Requirements			
1	Draft System Availability & Reporting Requirement	<p>Eight entities commented that they support the draft requirements and specified that they agree the requirements should mirror those of the supporting 278 transaction infrastructure requirements. Four of these entities provided additional comments:</p> <ul style="list-style-type: none"> - One commented that the availability should be higher but accepts 86% availability per week. - Another mentioned that they hope to see the requirement increase in the future. - Another noted that the system availability is often a proprietary business agreement with trading partners. - Another explained that if these requirements exist, health plans must be transparent about them. 	<p>Additional research on industry readiness for an increase in system availability will be conducted and pursued in a future CAQH CORE Infrastructure Update that would address all interactions for which CAQH CORE Operating Rules have been developed.</p>

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#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
2	Draft System Availability & Reporting Requirements	<p>One entity stated that since the expectation is for the processor to receive a X12 275 transaction and acknowledge it using the X12 999 transaction, the last sentence should be modified from:</p> <p><i>"...process an X12 6020X316 275 Additional Information and a X12 6020X290 999 IA transaction."</i></p> <p>To:</p> <p><i>"...process an X12 v6020X316 275 Additional Information and acknowledge receipt by returning an X12 v6020X290 999 transaction."</i></p>	Agree. Adjust for clarity.
3	Draft System Availability & Reporting Requirements	One entity noted that the X12 999 IA transaction should just be written as the X12 999 transaction.	Agree. Adjust to align with prior CAQH CORE Operating Rules – X12 v5010 999.
Non-substantive Comments Pertaining to Draft Payload Acknowledgements & Response Time Requirements			
4	Draft Payload Acknowledgement & Response Time Requirements – Batch & Real Time	One entity supported the response time for batch and real-time processing but recommended adding clarifying language to anticipate error handling (e.g., to state that the X12 999 response will indicate that the Functional Group/Transaction Set was either accepted, accepted with errors, or rejected).	Agree. Similar to prior CAQH CORE Infrastructure Rules, the Draft CAQH CORE Attachments (PA Use Case) Infrastructure Rule will include clarifying language in these sections to anticipate error handling.
5	Draft Payload Acknowledgement & Response Time Requirements – Real Time	One entity commented that their organization does not currently support real-time responses for the X12 275 transaction.	While the Draft CAQH CORE Attachments (PA Use Case) includes requirements pertaining to real-time, entities are not required to implement both real-time and batch requirements. However, both processing modes are available for those organizations who choose to utilize real-time processing for the exchange of the X12 v6020 275 transaction.

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#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
6	Draft Payload Acknowledgement & Response Time Requirements – Batch & Real Time	<p>Eight entities supported the draft requirements and emphasized that the turnaround times should mirror that of the supporting X12 278 transaction. Two of these entities provided additional comments pertaining to their support.</p> <ul style="list-style-type: none"> - One noted that batch processing should be more and more rare and ultimately replaced by real-time processing. - Another stated their support and stated definition of remaining 10% of cases that will not hold to this requirement would be desired. 	N/A
Non-substantive Comments Pertaining to Draft File Size Requirements			
7	Draft File Size Requirements – Front End Server & Internal Management System	<p>Seven entities explained their support for the draft front-end servers file size requirement.</p> <ul style="list-style-type: none"> - Two of these entities noted that they have not encountered a file over 64MB to date and internal testing may be needed to confirm size limits can be supported. - Another stated that their organization currently only supports a minimum of 45MB but is supportive. - Another emphasized that the X12 v6020 275 TR3 includes a maximum size limit of 200MB for multiple BDS segments, which does not prohibit the requirement from setting a minimum/floor. - Another commented that most of their organization’s attachments are less than 5MB. - Another supported the requirement but continued to urge market analysis to ensure appropriateness. - Another agreed that 64MB is the bare minimum (floor) and sometimes more than 64MB is required. 	N/A
Non-substantive Comments Pertaining to Draft Electronic Policy Access Requirements			
8	Draft Electronic Policy Access Requirements	<p>One entity noted that many of the items in the list of potential documents to include electronically mean the same thing but are worded differently.</p>	Agree. CAQH CORE Co-chairs and staff will refine the list and provide guidelines based on straw poll feedback and discussion on today’s call to provide education on industry best practices.

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ASG-PA Straw Poll #1 Results**

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
9	Draft Electronic Policy Access Requirements	<p>Four entities expressed their support for the draft electronic policy access requirements.</p> <ul style="list-style-type: none"> - Two entities agreed that attachment data should be available to health plans and providers via different avenues online (e.g., links to coverage policy bulletins, etc.). - One of these entities explained that the documents are already listed in their provider manual, which is online. - Another expressed the need to have electronically accessible medical policy information. 	N/A
Non-substantive Comments Pertaining to Draft Master Companion Guide Template Requirements			
10	Draft Master Companion Guide Template Requirements	<p>Three entities commented on the content that must be included in the Master Companion Guide.</p> <ul style="list-style-type: none"> - One of these entities asked for clarification that entities only need to follow the flow and format of the Master Companion Guide; the requirements do not specify verbatim Companion Guide language. - Another suggested adding scheduled downtimes to a published, publicly available transaction companion guide. - Another asked whether a Master Companion Guide for health plans with business units that are non-HIPAA covered entities will assume the overall organization is under HIPAA. They asked if a notice of HIPAA exception can be posted in place of a companion guide, if the Master Companion Guide doesn't apply. 	<p>Like prior Master Companion Guide requirements included in CAQH CORE Infrastructure Rules, the draft Master Companion Guide Template requirements establish a format and flow for a companion guide; it does not specify verbatim language and therefore requiring entities to add downtimes to their companion guides is out of scope.</p>
11	Draft Master Companion Guide Template Requirements	<p>Two entities agreed that the companion guide template requirements must stay consistent with the requirements included in prior CAQH CORE Infrastructure Rules.</p>	N/A

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10.2 Non-Substantive Comments Received on Part B: *Draft CAQH CORE Attachments (PA Use Case) Data Content Rule Requirements*

Table 7 below summarizes non-substantive comments received from ASG-PA Straw Poll respondents pertaining to Part B: *Draft CAQH CORE Attachments (PA Use Case) Data Content Rule Requirements*

Table 7: Non-Substantive Comments Received on Part B: *Draft CAQH CORE Attachments (PA Use Case) Data Content Rule Requirements*

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
Non-substantive Comments Pertaining to Draft Data Error Handling Requirements			
1	Draft Data Error Handling Requirements – <i>Batch & Real Time</i>	<p>Three entities reiterated their support for the draft data error handling requirements.</p> <ul style="list-style-type: none"> - One agreed that the X12 824 transaction will be used to report errors for attachment processing. - Another highlighted their support for the lack of time requirements on the X12 824 transaction. - Another said that providers and clearinghouses should be notified of any errors that were found or if an attachment was accepted without errors. 	N/A
2	Draft Data Error Handling Requirements – <i>Batch & Real Time</i>	<p>Two entities supported the draft data error handling requirements and further explained their organization’s specific data error handling workflow.</p> <ul style="list-style-type: none"> - One commented that their organization does not currently use the X12 824. - Another explained that their organization uses the X12 824 for rejects, and the X12 999 for accepts. They also noted that while they currently support the 5010 version, their organization would support the 6020 version, when mandated. 	N/A

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ASG-PA Straw Poll #1 Results**

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
Non-substantive Comments Pertaining to Draft Reassociation Requirement			
3	Draft Reassociation Requirements - Use of PWK Code EL	<p>Four entities emphasized their support for the use of PWK Code EL to notify payers that additional documentation is being transmitted to submit an unsolicited X12 275 with additional documentation in the Binary Data Segment in support of a X12 278 Request:</p> <ul style="list-style-type: none"> - One noted that this is what the TR3 specifies. - The other commented that this is their preferred option for reassociation. - Another commented that they support the use of the code EL for the transmission from provider to health plan. - Another supported the requirement but noted that using the PWK segment to notify health plans that an unsolicited attachment has been sent works when there's manual intervention involved with sending a X12 278 Request but does not work when a prior authorization request is being created at the time of order entry within an EMR. 	N/A
4	Draft Reassociation Requirements - Use of MSG Segment	<p>Two entities explained their support for the draft reassociation requirement pertaining to the use of the MSG segment in the X12 278 Prior Authorization Request to indicate that additional documentation is being sent to the payer without the use of X12.</p> <ul style="list-style-type: none"> - One commented that while they support the rule, sending this information via the message segment is the last resort as there are many attachment types in the PWK segment that could be used to identify the attachment. - Another said that they support providers having the capability to use the MSG segment if they are not using the X12 275 to send additional documentation. 	N/A
5	Draft Reassociation Requirements - Use of PWK Code AA & Use of MSG Segment	<p>Two entities suggested CAQH CORE submit a data maintenance request to X12 for the inclusion of a code for this scenario.</p>	As CAQH CORE conducts additional research in this space, we will also continue to collaborate with X12 to ensure coordination of efforts.

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10.3 Non-Substantive Comments Received on Part C: Feedback on HL7 C-CDA

Table 8 below summarizes non-substantive comments received from ASG-PA Straw Poll respondents pertaining to Part C: Feedback on HL7-C-CDA

Table 8: Non-Substantive Comments Received on Part C: Feedback on HL7 C-CDA

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
1	Feedback on HL7 C-CDA	<p>Eight entities explained their vote to support the inclusion of HL7 C-CDA in the draft data content requirements.</p> <ul style="list-style-type: none"> - Three entities stated their support for the inclusion of HL7 C-CDA with the condition that it is situationally used as trading partners are not required to support its use but when it is used. They cautioned burden on providers needing to support multiple exchange formats. - Another stated that they support the inclusion of HL7 C-CDA but highlighted that it is not a complete set of data for most prior authorization request submissions and that significantly more data is required. - Another noted that they have some experience within the organization with HL7 C-CDA. - Another simply reiterated their support. - Another explained that if it isn't included, the rule will be out of date shortly after it is published. - Another supported the inclusion, but noted that it could be premature without an attachments standard. 	N/A
2	Feedback on HL7 C-CDA	One entity recommended that CAQH CORE draft specific operating rule requirements around HL7 C-CDA rather than referencing it generally.	N/A
3	Additional HL7 C-CDA Feedback	One entity noted that the PIE WG at HL7 is currently working on an update and that the current version is not widely implemented.	N/A
4	Additional HL7 C-CDA Feedback	One entity stated that most provider entities fail to follow HL7 C-CDA specifications or instructions in critical ways.	N/A

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11. Appendix B: Additional Tables from Straw Poll #1

Appendix Table 1. Documentation and/or Information Organizations Make Available to Support Providers

ASG – PA Straw Poll #1 respondents were asked to review the list of documentation and/or information provided and check all items that their organization makes available to providers to support prior authorizations. The table below lists the types of documentation/information and the number of organizations that selected an option for inclusion in the draft rule.

NOTE: CAQH CORE ASG-PA Co-Chairs and staff recommend removing the Draft Electronic Policy Access Requirement from the Draft CAQH CORE Attachments (PA Use Case) Infrastructure Rule and associated recommendations pertaining to information for health plans to publish electronically. **The list included in Table 1 below reflects the straw poll results only.**

Table 1. Documentation and/or Information Organizations Make Available to Support Providers

Documentation/Information Type	# Selected (Out of 36 Total Submissions)
Prior Authorization Policies	25
Links to Authorization Forms	24
List of Services Requiring Prior Authorization	24
Services that Require UM Review	23
Documentation Requirements	22
Medical Policies	22
Provider Appeal & Grievance Policy	21
Coverage Guidelines/Policies	17
Links to Policies	17
Provider Manual	17
Links to Delegated Vendors	16
List of Procedures	15
Claim Process & Procedures	15
UM Timeliness Standard	15
Billing Policies	14
Procedure Code Search Tool	12
Payment Policies	10
URL Links to Coverage Policy	7
LCD/NCD Guide Links	3

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Appendix Table 2. Reassociation References to Support Solicited and Unsolicited X12 275 Sent to Support an X12 278 Request

ASG – PA Straw Poll #1 respondents were asked to rank 10 common reference identifiers or metadata. The table below contains the reference identifiers listed in order from those ranked highest to lowest in terms of use.

NOTE: Given the small range in differences between average rank for each of the listed identifiers, the Draft CAQH CORE Attachments (PA Use Case) Data Content Rule will include each of the recommendations below. As a reminder, the list of recommendations is not intended to be exhaustive or prohibitive.

Table 2. Reassociation References

#	Reference Listed	Average Rank (Out of 36 Total Submissions)
1	Reference #	7.03
2	Internal Medical Facility #	7.00
3	DOS	6.51
4	ACN	5.74
5	Case Reference / ID #	5.46
6	DOB	5.34
7	Member Name	5.23
8	PA Tracking #	4.43
9	Authorization ID	4.20
10	Member ID	4.06

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Appendix Table 3. File Naming Elements Used with Attachments Sent or Made Available Via Non-X12 275 Methods

ASG – PA Straw Poll respondents were asked to check all elements that would assist with **reassociation** in their document processing systems, if used in a file name by providers when providers make additional documentation available via a non-x12 275 method. The table below lists the element options and the number of organizations that selected an option for inclusion in the draft rule.

NOTE: Items that were selected by **10** or more ASG-PA Straw Poll respondents (shown in the box in red) will be included in the Draft CAQH CORE Attachments (PA Use Case) Data Content Rule as recommendations for providers to use to assist document management systems with reassociation.

Table 3. File Naming Elements

Element	# Selected (Out of 36 Total Submissions)
Member ID	25
Auth #	21
DOB	18
Provider ID (general either TIN/NPI)	18
Patient ID	18
DOS	16
NPI	15
Prior Authorization "Tracking" #	15
Patient Last Name	14
Procedure	12
Subscriber/Dependent First & Last Name	10
ACN #	9
PWK01 Values	9
Auth vs Claim Attachment Indicator	9
Medical Record # (from EHR)	8
Diagnosis	8
Date Stamp	7
Facility ID	6
Type of File	6
TIN	6
Batch #	4
Internal Order ID #	4
Payor Name	4
Plan	2
Event Level HCR01 Status #	1

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Appendix Table 4. Non-X12 Scenarios to Support Attachment Submission

ASG – PA Straw Poll #1 respondents were asked to select each non-X12 scenario that should apply in the draft rule. The table below contains the selections listed in order from those selected most frequently by respondents to least.

NOTE: CAQH CORE ASG-PA Co-chairs and staff will begin to develop draft requirements pertaining to the **3** scenarios that was selected by 20 or more straw poll respondents (HL7 FHIR + HL7 C-CDA; CORE Connectivity + PDF; CORE Connectivity + HL7 C-CDA).

Table 4. Non-X12 Scenarios to Support Attachment Submission

Reference Listed	# Selected (Out of 36 Total Submissions)
HL7 FHIR + HL7 C-CDA	23
CORE Connectivity + PDF	21
CORE Connectivity + HL7 C-CDA	20
CORE Connectivity	17
Web Portal	16
Direct messaging	11
Proprietary/Other	7

For ASG-PA Discussion Only