

**CAQH Committee on Operating Rules for Information Exchange (CORE)  
CAQH CORE Connectivity & Security Work Group (CSWG)  
CSWG Straw Poll #1 Results**

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## 1. Overview

### 1.1 Background

The CSWG launched in February 2020 to evaluate opportunities to strengthen existing CAQH CORE Connectivity Rules and move the industry towards a common set of Safe Harbor connectivity methods that address existing and emerging connectivity standards and security protocols to support the intersection of administrative and clinical data exchange.

On its 02/26/20 call, CSWG participants reviewed and discussed six potential opportunity areas to update the CAQH CORE Connectivity Rules in preparation to complete the first CSWG Feedback Form:

- **Opportunity Area #1:** Potential Updates to CAQH CORE Connectivity Safe Harbor Requirements
- **Opportunity Area #2:** Single, Uniform CAQH CORE Connectivity Rule
- **Opportunity Area #3:** Potential Updates to CAQH CORE Connectivity Transport Security Requirements
- **Opportunity Area #4:** Potential Updates to CAQH CORE Connectivity Submitter Authentication Requirements
- **Opportunity Area #5:** Potential Updates to CAQH CORE Connectivity Message Interactions Requirements
- **Opportunity Area #6:** Potential Updates to CAQH CORE Connectivity API/Web Service Requirements

The first feedback form evaluated potential updates to the existing CAQH CORE Connectivity Rules and provided further insight into the feasibility and impact of potential updates to existing connectivity rule requirements being considered by the Work Group.

On its 04/01/20 call, the CSWG reviewed the results of the feedback form and discussed substantive comments and points of clarification submitted by Work Group participants. Given the high support for pursuing all six opportunity areas presented on the feedback form, the Work Group decided to move forward with drafting updated scope and requirement sections to the existing CAQH CORE Connectivity Rule vC3 (formerly known as CAQH CORE Phase IV Connectivity Rule) and to further scope opportunity areas for potential REST requirements to include in the rule update (**NOTE: the existing CAQH CORE Connectivity Rule vC3 only supports the transport of SOAP messages**).

On its 04/29/20 call, the CSWG reviewed draft substantive updates to the existing CAQH CORE Connectivity Rule vC3 (which pertains to the transport of SOAP messages) and opportunity areas for REST requirements, in preparation for the upcoming straw poll.

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## **1.2 Format of Straw Poll**

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

- **PART A: Draft Substantive Updates to Scope**
  - UPDATED: *Section 3.2 Standards Used in this Rule*
  - UPDATED: *Section 3.3 When the Rule Applies*
  - UPDATED: *Section 3.4 When the Rule Does Not Apply*
  - NEW: *Section 3.8.1 Maintenance of Connectivity Standards Used in this Rule*
  
- **PART B: Draft Substantive Updates to Select Rule Requirements**
  - UPDATED: *Section 4 Rule*
  
- **PART C: Draft Substantive Updates to Appendix**
  - UPDATED: *Section 7.3 Sequence Diagrams*
  
- **PART D: Questions on Opportunity Areas for Potential REST Requirements**
  - Opportunity Area #1: Payload Types
  - Opportunity Area #2: Processing Mode – Synchronous and Asynchronous
  - Opportunity Area #3: Architecture Constraints
  - Opportunity Area #4: HTTP Methods
  - Opportunity Area #5: Error Handling
  - Opportunity Area #6: External API Endpoints

**Parts A, B and C** of the straw poll asked respondents to read the updated rule language and indicate their “Support” or “Non-support” for the substantive edits made to the draft rule language. Some sections had additional follow up questions to gain further feedback from the group on a draft updated requirement.

**Part D** of the straw poll asked respondents to indicate their “Support” or “Non-support” to pursue each of the opportunity areas for potential REST requirements. Follow up questions asked respondents for additional feedback pertaining to the potential requirements.

**NOTE:** Non-substantive updates will be made throughout the CAQH CORE Connectivity Rule Update to reflect changes in notation, updated references, clarifying language, etc. These updates do not impact rule requirements and are not specifically reviewed in straw polls. However, a grey highlighted version of the entire rule update will be made available for future review and non-substantive edits will be included. Examples of the types of non-substantive adjustments that will be made to the CAQH CORE Connectivity Rule Update include: updated notation from ASC X12N to X12, adjusted rule language to accommodate CAQH CORE’s transition from phases to transactions, updated section number references that may have changed as sections were added or removed, and minor grammatical edits.

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## 2. Summary of Straw Poll Respondents

Responses were received from **21** respondents representing **84%** of Connectivity & Security Work Group participating organizations.

Total Number of Individual Responses	21 (84% of the CSWG)
Number of Provider / Provider Association / Provider-Facing Vendor Responses	3 (14% of respondents)
Number of Health Plan / Health Plan Association / Health-Plan Facing Vendor Responses	9 (43% of respondents)
Number of Dual-Facing Vendor / Clearinghouse Responses	5 (24% of respondents)
Number of Government / 'Other' Responses	4 (19% of respondents)

## 3. Percent Support for Draft Substantive Updates to the Existing CAQH CORE Connectivity Rule vC3 (Straw Poll Parts A – C)

When the straw poll closed on Friday, 05/22/20, all sections of the existing CAQH CORE Connectivity Rule vC3 with draft substantive updates had least **90% support**, as shown in Table 1 below.

**Table 1. Percent Support for Draft Substantive Updates to the Existing CAQH CORE Connectivity Rule vC3**

#	CSWG Straw Poll #1: Support for Draft Substantive Adjustments to Existing CAQH CORE Connectivity Rule vC3	Support (%)	Do Not Support (%)	Abstain #
<b>PART A: Draft Substantive Updates to Scope</b>				
1	UPDATED: <i>Section 3.2 Standards Used in this Rule</i>	17 (94%)	1 (6%)	3
2	UPDATED: <i>Section 3.3 When the Rule Applies</i>	18 (90%)	2 (10%)	1
3	UPDATED: <i>Section 3.4 When the Rule Does Not Apply</i>	18 (90%)	2 (10%)	1
4	NEW: <i>Section 3.8.1 Maintenance of Connectivity Standards Used in this Rule</i>	18 (95%)	1 (5%)	2
<b>PART B: Draft Substantive Updates to Select Rule Requirements</b>				
5	UPDATED: <i>Section 4 Rule</i>	20 (100%)	0 (0%)	1
<b>PART C: Draft Substantive Updates to Appendix</b>				
6	UPDATED: <i>Section 7.3 Sequence Diagrams</i>	19 (100%)	0 (0%)	2

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**Table 2. Percent Support for Submitter Authentication Requirement Options for the Transport of SOAP Messages**

#	CSWG Straw Poll #1: Support for Submitter Authentication Requirement Options for the Transport of SOAP Messages.	Option A (X.509 over TLS 1.2 only)	Option B (X.509 AND OAuth 2.0 over TLS 1.2)	Abstain
<b>PART B: Draft Substantive Updates to Select Rule Requirements</b>				
1	Support for submitter authentication requirement options for the transport of SOAP messages.	6 (40%)	9 (60%)	6

#### 4. Percent Support for Opportunity Areas for Potential REST Requirements (Straw Poll Part D)

When the straw poll closed on Friday, 05/22/20, all opportunity areas for potential REST requirements had least **83% support**, as shown in Table 3 below.

**Table 3. Percent Support for Opportunity Areas for Potential REST Requirements**

#	CSWG Straw Poll #1: Support for Opportunity Areas for REST Requirements	Support (%)	Do Not Support (%)	Abstain #
<b>Opportunity Area #1: Payload Types</b>				
1	Support for defining a minimum set of payload types that a REST exchange should support (e.g., X12 Transactions, HL7 Messages, PDFs, Image Files, etc.).	16 (94%)	1 (6%)	4
<b>Opportunity Area #2: Processing Mode: Synchronous and Asynchronous</b>				
2	Support for requiring REST exchanges to have the capability to support both real-time (sync) and batch (async) processing modes.	15 (83%)	3 (17%)	3
<b>Opportunity Area #3: Architecture Constraints</b>				
3	Support for specifying guidelines on how to version a REST API to manage and reduce complexity (e.g., URI Versioning or Header Versioning).	16 (100%)	0 (0%)	5
4	Support for specifying data format standard(s) for a REST exchange to reduce variation and ease implementations (e.g., JSON).	16 (100%)	0 (0%)	5
5	Support for setting uniform expectations for REST documentation requirements.	16 (94%)	1 (6%)	4

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#	CSWG Straw Poll #1: Support for Opportunity Areas for REST Requirements	Support (%)	Do Not Support (%)	Abstain #
<b>Opportunity Area #4: HTTP Methods</b>				
6	Support for specifying a common set of HTTP methods for a REST exchange to support.	16 (100%)	0 (0%)	5
7	Support for developing a requirement that provides descriptions and guidance on when to use each HTTP method across a set of use cases.	17 (100%)	0 (0%)	4
<b>Opportunity Area #5: Error Handling</b>				
8	Support for requiring a REST exchange to support a (normative, not comprehensive) list of a minimal set of HTTP Status/Error Codes at the transport processing layer.	16 (100%)	0 (0%)	5
9	Support for requiring a REST exchange to support a uniform list of error codes at the payload processing layer.	16 (100%)	0 (0%)	5
<b>Opportunity Area #6: API Endpoints</b>				
10	Support for requiring the use of standardized naming conventions for API endpoints to streamline and support uniform REST implementations.	13 (85%)	2 (15%)	6

## 5. Summary of CSWG Straw Poll Comments Received

Respondents were given the opportunity to provide comments on each of the questions asked on the straw poll. Three categories of comments were received:

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

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

## 6. Comments Received on CSWG Straw Poll #1 Parts A – C: Substantive Updates to Existing CAQH CORE Connectivity Rule vC3 (Pertains to SOAP Only)

### 6.1 Comments Received on Part A: Draft Substantive Updates to Scope

Table 4 below summarizes points of clarification received from CSWG Straw Poll respondents pertaining to Part A: Draft Substantive Updates to Scope, along with CAQH CORE CSWG Co-chair and staff responses. There were no substantive comments submitted by CSWG Straw Poll respondents pertaining to Part A: Draft Substantive Updates to Scope. Non-substantive comments are available in Appendix A of this document for offline review.

**Table 4. Comments Received on Part A: Draft Substantive Updates to Scope**

#	Section	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
<b>Points of Clarification</b>			
1	Section 3.2 Standards Used in this Rule	<p>Three entities suggested adding clarifying language to <i>Draft Section 3.2 Standards Used in this Rule</i>:</p> <ul style="list-style-type: none"> <li>• One of these entities suggested adding “or higher” to each of the standards listed in this section (e.g., SOAP Version 1.2 <i>or higher</i>).</li> <li>• Another asked to specify TLS 1.3 or higher instead of TLS 1.2 or higher as it will be required by the end of 2021 and provides additional security updates, encryption, and performance improvements.</li> <li>• Another recommended including language to clarify that if the trading partner requires the use of the Safe Harbor, CORE-certified entities must accommodate that request, similar to the language included in the CAQH CORE Connectivity Rule vC2.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Adjust for clarity.</b> CAQH CORE Co-chairs and staff will adjust the language in <i>Draft Section 3.2 Standards Used in this Rule</i> with the language suggested by the first commenter (i.e., add “or higher” to the rule language).</li> <li>• <b>Do not adjust.</b> Given 93% of CSWG straw poll respondents supported the section as written, and organizations are not precluded from supporting versions higher than TLS 1.2, CAQH CORE Co-chairs and staff recommend specifying TLS 1.2 or higher to promote adoption and therefore interoperability throughout the industry.</li> <li>• <b>Do not adjust.</b> <i>Draft Section 3.3 When this Rule Applies</i> includes the language recommended by the third commenter stating that the Rule is a Safe Harbor, and therefore only needs to be used if mutually agreed to by the trading partners. The section further clarifies that HIPAA-covered entities or their agents may use the rule for the exchange of eligibility, claim status and ERA transactions in accordance with the Safe Harbor provision of the CAQH CORE Connectivity Rule vC2 (formerly known as Phase II CAQH CORE 270), which is ACA-mandated.</li> </ul>

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#	Section	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
2	Section 3.3 When this Rule Applies	<p>Three entities recommended adjustments to <i>Section 3.3 When this Rule Applies</i>:</p> <ul style="list-style-type: none"> <li>• One entity suggested including TA1 in the list of X12 transactions.</li> <li>• Another commented that “payload type” should be replaced with “transaction standards”.</li> <li>• Another noted that the process for determining which non-HIPAA mandated transaction are in scope should be clearly communicated. For example, X12 v6020 X316 275 Additional Information to Support a Health Care Services Review is listed in this section, while other transactions are not.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Do not adjust.</b> While <i>Draft Section 3.3 When this Rule Applies</i> specifies a list of X12 transactions that the CAQH CORE Connectivity Rule Update applies to, the connectivity and security requirements can be optionally applied to X12 transactions not listed and other payload types (e.g. C-CDA, .pdf, .doc, etc.). Further, the TA1 is included in the <a href="#">CAQH CORE-Required Processing Mode Payload Type Tables</a> for CAQH CORE Connectivity Rule vC3.</li> <li>• <b>Do not adjust.</b> <i>Draft Section 3.3 When this Rule Applies</i> of the existing CAQH CORE Connectivity Rule is specific to messages transported using SOAP. Therefore, CAQH CORE CSWG Co-chairs and staff recommend using <i>payload type</i> as the term for messages transported using SOAP. Alternative terms will be considered for the transport of messages using REST, which will be addressed in a separate rule.</li> <li>• <b>Do not adjust.</b> To create a single, uniform CAQH CORE Connectivity Rule, <i>Draft Section 3.3 When this Rule Applies</i> was updated to include all X12 transactions addressed by CAQH CORE Operating Rules, both mandated and voluntary. Similar to the approach taken in the existing CAQH CORE Connectivity Rule vC3, <i>Draft Section 3.3</i> also references the CAQH CORE Connectivity Rule vC2 to clarify that while the requirements in the updated CAQH CORE Connectivity Rule support the listed X12 transactions, HIPAA-covered entities must continue to support the requirements established in the ACA-mandated CAQH CORE Connectivity Rule vC2.</li> </ul> <p>While the Draft CAQH CORE Connectivity Rule Update specifies requirements for the X12 transactions addressed in CAQH CORE Operating Rules (those listed in <i>Section 3.3</i>), the connectivity and security requirements can optionally be applied to additional payload types (e.g., C-CDA, .pdf, .doc, etc.).</p> <p>Finally, all non-HIPAA mandated transactions are included in the CAQH CORE-Required Processing Mode Payload Type Tables and this update includes additional transactions for greater comprehensiveness of the rule.</p>



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#	Section	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
3	Section 3.4 When the Rule Does Not Apply	One entity commented that alternative standards to SOAP exist for non-HIPAA mandated data exchanges. Therefore, the CAQH CORE Connectivity Rule should not encourage the industry to adopt SOAP for all payload types.	<ul style="list-style-type: none"> <li>• <b>Do not adjust.</b> The aim of the CAQH CORE Connectivity Rule is to modernize the base connectivity and security standards that are used across transactions to promote interoperability through a structured, yet flexible framework. To drive interoperability, the CAQH CORE CSWG voted to pursue both SOAP and REST transport methods as part of the CAQH CORE Connectivity Rule Update.</li> </ul> <p><i>Draft Section 3.4 When the Rule Does Not Apply</i> reflects the updates to the SOAP Rule only. CSWG participants will have the opportunity to provide feedback on draft scope and requirements sections of the REST rule following the next Work Group call.</p>
4	Section 3.4 When the Rule Does Not Apply	One entity requested additional language to be added to <i>Draft Section 3.4 When the Rule Does Not Apply</i> to further clarify that the Rule is payload agnostic.	<ul style="list-style-type: none"> <li>• <b>Adjust for clarity.</b> CAQH CORE CSWG Co-chairs and staff will draft adjusted language to this section, as recommended by the commenter.</li> </ul>
5	Section 3.8.1 Maintenance of Connectivity Standards Used in this Rule	<p>Two entities commented on the maintenance process detailed in <i>Draft Section 3.8.1 Maintenance of the Connectivity Standards Used in this Rule</i>.</p> <ul style="list-style-type: none"> <li>• One asked why the maintenance process is triggered only by the date of federal regulation. They noted that CORE-certified entities would also benefit from rule maintenance, whether the rules are federally mandated or not.</li> <li>• The other suggested CAQH CORE develop standard procedures for how rules are maintained and updated.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Adjust for clarity.</b> CAQH CORE CSWG Co-Chairs and staff will adjust the language in <i>Draft Section 3.8.1 Maintenance of Connectivity Standards Used in this Rule</i> for clarity, as recommended by the first commenter.</li> <li>• <b>Do not adjust.</b> CAQH CORE started as a voluntary effort. As such, before any CAQH CORE Operating Rules were mandated, CAQH CORE drove voluntary adoption and <a href="#">maintenance of the CAQH CORE Operating Rules</a> using a transparent approach that addressed both substantive and non-substantive updates.</li> </ul> <p>The mandated CAQH CORE Operating Rules support this <a href="#">maintenance process</a>, as well as the ability for CAQH CORE to conduct routine, periodic maintenance of specific federally adopted operating rule requirements, based on ongoing use, need and lessons learned. This model has proved successful for industry by allowing these three types of updates to complement one another, yet not overload the industry with constant updates or unnecessary overhauling. CAQH CORE believes that a cycle of maintenance for mandated operating rules and standards will help drive the CAQH CORE vision of an ever-evolving improving system of electronic transactions.</p>

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#	Section	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
6	Section 3.8.1 Maintenance of Connectivity Standards Used in this Rule	One entity asked when the industry would be required to implement changes to CAQH CORE Safe Harbor Connectivity made in this update.	<p>Currently, any updates to the CAQH CORE Connectivity Rule vC3 are voluntary for industry adoption, while CAQH CORE Connectivity Rules vC1 and vC2 are ACA-mandated.</p> <p>The CAQH CORE Board plans to propose the revised Connectivity Operating Rules Package to the National Committee on Vital and Health Statistics (NCVHS) for recommendation to the HHS Secretary for national adoption under HIPAA. Should the revised Connectivity Operating Rules Package become mandated in the future, there would be an implementation period for the industry to mitigate systems and business processes to meet the requirements.</p>

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**6.2 Comments Received on Part B: Draft Substantive Updates to Select Rule Requirements**

Table 5 below summarizes comments received from CSWG Straw Poll respondents pertaining to Part B: Draft Substantive Updates to Select Rule Requirements, along with CAQH CORE CSWG Co-chair and staff responses. Non-substantive comments are available in Appendix A of this document for offline review.

**Table 5. Comments Received on Part B: Draft Substantive Updates to Select Rule Requirements**

#	Question	Summary of Comments	CAQH CORE CSWG Co-chair & Staff Response
<b>Points of Clarification</b>			
1	Section 4 Rule: Submitter Authentication Options	One entity suggested that CAQH CORE should conduct more research and analysis on the specific use cases for OAuth. They also commented that <b>Option B</b> (X.509 AND OAuth 2.0) may be premature.	<p>CAQH CORE CSWG Co-chairs and staff conducted extensive research on the topic prior to the launch of the CSWG and throughout the Work Group process. On the first CSWG Feedback Form, 76% of Work Group respondents voted to pursue the development of OAuth as an authorization standard. CAQH CORE CSWG Co-Chairs and staff noted that on future straw polls, CSWG participating organizations would have the opportunity to provide feedback as to whether OAuth 2.0 should be <i>in addition</i> to the base requirement (X.509 Digital Certificate).</p> <p>CAQH CORE CSWG Co-chairs and staff will continue to conduct research on the use of OAuth 2.0 with messages transmitted using SOAP. As always, CAQH CSWG Participants will have the opportunity on future straw polls to review the draft requirement and provide feedback.</p>
<b>Substantive Comments</b>			
2	Section 4 Rule: Submitter Authentication Options	One entity commented that they would have preferred an <b>OR</b> option rather than an <b>AND</b> option for <b>Option B</b> (X.509 AND OAuth 2.0).	<p><b>For CSWG Discussion.</b></p> <p>Given 87% of Work Group Feedback Form respondents voted to continue the use of X.509 Digital Certificates as an authentication standard in the updated CAQH CORE Connectivity Rule, CSWG Co-chairs and staff recommended to continue support for X.509 Digital Certificates as a base requirement. Additionally, 76% of Feedback Form respondents supported pursuing OAuth as an authorization standard. Additional CSWG discussion and feedback is required as to whether OAuth 2.0 should be included as additional requirement (X.509 and OAuth 2.0) or an optional requirement (X.509 with optional support of OAuth 2.0) for the CAQH CORE Connectivity Rule Update that pertains to SOAP.</p> <p>As the scope and requirements for the REST Connectivity Rule continue to be developed, the Work Group will have the opportunity to review and give feedback on draft requirements that include the use of X.509 and OAuth 2.0 over REST.</p>

## 7. Comments Received on CSWG Straw Poll #1 Part D: Opportunity Areas for Potential REST Requirements

**NOTE:** There were no substantive comments or points of clarification received from CSWG Straw Poll respondents on Opportunity Area #3: Architecture Constraints. Non-substantive comments for Opportunity Area #3 can be found in Appendix A of this document for offline review. Additionally, there were no comments received from CSWG Straw Poll respondents on Opportunity Area #4: HTTP Methods that were not addressed in other opportunity areas.

### 7.1 Comments Received on Opportunity Area #1: Payload Types

Table 6 below summarizes points of clarification received from CSWG Straw Poll respondents pertaining to Opportunity Area #1: Payload Types, along with CAQH CORE CSWG Co-chair and staff responses. There were no substantive comments submitted by CSWG Straw Poll respondents pertaining to REST Opportunity Area #1: Payload Types. Non-substantive comments for this opportunity area are available in Appendix A of this document for offline review.

**Table 6. Comments Received on Opportunity Area #1: Payload Types**

#	Opportunity Area	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
<b>Points of Clarification</b>			
1	Opportunity Area 1: Payload Types	<p>One entity commented that they need to further understand how the CAQH CORE Connectivity Rule Update would apply to non-HIPAA mandated transactions before they can support defining a minimum set of payload types for a REST exchange to support.</p> <p>They also asked whether the intent is to transition fully to a REST architectural style, noting that limited web services support both SOAP and REST.</p>	<p>CAQH CORE Connectivity Rules are designed to be payload agnostic. The ACA-mandated CAQH CORE Connectivity Rule vC2 and voluntary CAQH CORE Connectivity Rule vC3 support the exchange of both HIPAA-mandated and non-HIPAA mandated transactions. The CAQH CORE Connectivity Rule Update would take a similar approach to prior connectivity rules of accommodating various payload types and providing generic and specific examples for both mandated and non-mandated transactions.</p> <p>Additionally, one aim of the CAQH CORE Connectivity Update is to provide an opportunity for CAQH CORE Operating Rules to bridge the gap between existing and emerging standards and achieve alignment to support administrative and clinical data exchange.</p> <p>On the first feedback form, CSWG participating organizations voted to update the existing methods of connectivity (SOAP) and to pursue development of requirements for specific use cases using emerging methods (REST). As the requirements for the REST Connectivity Rule are developed, CAQH CORE CSWG participants will have the opportunity to review and provide feedback as to which use cases the requirements would apply.</p>

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2	Opportunity Area 1: Payload Types	One entity recommended clarifying that this potential REST requirement would only apply to transactions supported by the entity. For example, a clearinghouse may only support the X12 claims transaction, acknowledgements, and remittances with no products that support prior authorization, eligibility, claim status, or attachments.	<p><b>Adjust for clarity.</b></p> <p>Similar to the existing CAQH CORE Connectivity Rule vC3, an updated Connectivity Rule pertaining to REST will clarify that the potential requirements only apply to the transactions conducted by a specific vendor/clearinghouse.</p>

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**7.2 Comments Received on Opportunity Area #2: Processing Mode – Synchronous and Asynchronous**

Table 7 below summarizes points of clarification received from CSWG Straw Poll respondents pertaining to Opportunity Area #2: Processing Mode - Synchronous and Asynchronous, along with CAQH CORE CSWG Co-chair and staff responses. There were no substantive comments submitted by CSWG Straw Poll respondents pertaining to REST Opportunity Area #2: Processing Mode. Non-substantive comments for this opportunity area are available in Appendix A of this document for offline review

**Table 7. Comments Received on Opportunity Area #2: Processing Mode – Synchronous and Asynchronous**

#	Opportunity Area	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
<b>Points of Clarification</b>			
1	Opportunity Area 2: Processing Mode	<p>Two entities suggested that organizations should be able to implement either real-time or batch processing but should not be required to implement both.</p> <ul style="list-style-type: none"> <li>• One explained that submitting batches over real-time implementations can cause significant pressure on API systems and REST uploads often fail in the middle of the upload if the connection is unstable.</li> <li>• The other noted that real-time exchange may not be supported or cost effective for all stakeholders.</li> </ul>	<p><b>Adjust for clarity.</b></p> <p>Given 83% of CSWG straw poll respondents support developing requirements for REST exchanges to have the capability to support real-time or batch processing modes as part of the CAQH CORE Connectivity Rule Update, CAQH CORE CSWG Co-chairs and staff recommend continuing to pursue this requirement for both real-time and batch processing.</p> <p>Additionally, CAQH CORE Infrastructure Rules define specific interaction requirements for each transaction that must be supported (e.g., real time interaction is required for eligibility whereas batch interaction is optional). CAQH CORE Connectivity Rules define batch interaction for eligibility for those who wish to support the optional interaction type for industry consistency. As the requirements are further built out and defined, CAQH CORE CSWG Co-chairs and staff will clarify the language to indicate more clearly that either real-time or batch processing (or both) may be supported by an organization.</p> <p>As always, CSWG participating organizations will have the opportunity on future straw polls to give feedback on the draft language of the rule requirements.</p>

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**7.3 Comments Received on Opportunity Area #5: Error Handling**

Table 8 below summarizes points of clarification received from CSWG Straw Poll respondents pertaining to Opportunity Area #5: Error Handling, along with CAQH CORE CSWG Co-chair and staff responses. There were no substantive or non-substantive comments submitted by CSWG Straw Poll respondents pertaining to REST Opportunity Area #5: Error Handling.

**Table 8. Comments Received on Opportunity Area #5: Error Handling**

#	Opportunity Area	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
<b>Points of Clarification</b>			
1	Opportunity Area 5: Error Handling	<p>Two entities asked for clarity on the type of error codes that would be required.</p> <ul style="list-style-type: none"> <li>One asked which entity would create and maintain the list of error codes since they would not be X12 error codes. They also commented that it seems like REST error codes could apply more broadly than to only health care transactions.</li> <li>Another asked for clarity on the type of error codes that would be required. They noted that, depending on specific system design, requiring error codes at the processing layer could be difficult to implement. They suggested that a set of processing layer error codes should be recommended instead of required in the Rule.</li> </ul>	<ul style="list-style-type: none"> <li>As part of the CAQH CORE Connectivity Rule Update, REST requirements may specify specific status or error codes to use (e.g., HTTP Status and Errors Codes), but similar to the approach taken for the existing CAQH CORE Connectivity Rule pertaining to SOAP, the list of error codes would be a normative reference tool, not an exhaustive list. Status Codes for errors are defined by standards organizations and maintained by these organizations (e.g. Internet Assigned Numbers Authority).</li> <li>Given the list of Status Codes for errors will be a normative list, the CAQH CORE Connectivity Rule Update would not intend to specify the codes required, but organizations should be prepared to accept the error codes included in the Rule.</li> </ul>

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**7.4 Comments Received on Opportunity Area #6: External API Endpoints**

Table 9 below summarizes points of clarification received from CSWG Straw Poll respondents pertaining to Opportunity Area #6: API Endpoints, along with CAQH CORE CSWG Co-chair and staff responses. There were no substantive comments submitted by CSWG Straw Poll respondents pertaining to REST Opportunity Area #6: External API Endpoints. Non-substantive comments for this opportunity area are available in Appendix A of this document for offline review

**Table 9. Comments Received on Opportunity Area #6: External API Endpoints**

#	Opportunity Area	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
<b>Points of Clarification</b>			
1	Opportunity Area 6: External API Endpoints	One entity noted that internal API to API exchanges should not be required to follow a standardized format.	The potential REST rule requirements pertaining to API endpoints would refer to external API endpoints only and would not apply to internal API to API exchanges.
2	Opportunity Area 6: External API Endpoints	One entity asked for clarification on what body would create and maintain standardized naming conventions and whether they would be specific to health care APIs.	<p>Similar to the Message Structure Specifications in Section 4.1.3 in the existing CAQH CORE Connectivity Rule vC3 that define metadata for how SOAP messages should be routed within the HTTP Header and Body, the standardized naming conventions for API endpoints in the REST rule would take a similar approach of defining a set of standard names for how endpoint components should be referenced. CSWG participating organizations will have the opportunity on future straw polls to give feedback on the draft language of the rule requirements.</p> <p>Additionally, a <a href="#">change and maintenance</a> process exists for CAQH CORE to conduct substantive, non-substantive, routine, periodic maintenance of operating rule requirements, based on ongoing use, need and lessons learned.</p>

**8. Next Steps**

- **CAQH CORE CSWG Co-Chairs and Staff will:**
  - Draft a call summary for today’s call for review and approval on our next Work Group call.
  - Adjust draft substantive updates to the existing CAQH CORE Connectivity Rule pertaining to the transport of SOAP messages.
  - Draft scope and REST requirement sections for review on the Work Group’s next call.
  
- **Connectivity & Security Work Group participants will:**
  - Participate in the next CAQH CORE CSWG Call #5 on **Wednesday, 06/24/20 from 2:00 PM – 3:30 PM ET.**
  - Review updated CSWG Activity Schedule included in the appendix of this document.



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## 9. Appendix A: Non-Substantive Comments

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

### 9.1 Non-Substantive Comments Received on Part A: Draft Substantive Updates to Scope

Table 10 below summarizes non-substantive comments received from CSWG Straw Poll respondents pertaining to Part A: Draft Substantive Updates to Scope along with CAQH CORE CSWG Co-chair and staff response, if applicable.

**Table 10. Non-Substantive Comments Received on Part A: Draft Substantive Updates to Scope**

#	Question	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
1	Section 3.2 Standards Used in this Rule	<p>Four entities described their support for the section and provided additional information on how their organizations use the standards listed.</p> <ul style="list-style-type: none"> <li>One entity noted that since OAuth 2.0 is used by many organizations, it makes sense to include it in this section as well as TLS 1.2, given TLS 1.0 has been deprecated and TLS 1.1 is not in use.</li> <li>Another commented that the model provides contemporary approaches and flexibility in security.</li> <li>Another noted that SSL 3.0 is still in use, but it is related to legacy systems and their organization supports TLS 1.2 or higher. They also commented that they conduct mutual authorizations with X.509 Digital Certificates on the web services side (server to server) but do not issue personal X.509 Digital Certificates to individuals.</li> <li>The final entity stated that they do not necessarily only use these standards.</li> </ul>	N/A
2	Section 3.2 Standards Used in this Rule	One entity suggested incorporating language into the introduction sections of the Rule Update that specifies that connectivity mechanisms must support patient privacy and the sharing of only 'minimum necessary' patient health information.	N/A

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#	Question	Summary of Comments	CAQH CORE CSWG Co-Chair & Staff Response
3	Section 3.3 When this Rule Applies	Two entities noted that X12 v5010X279A1 270/271 Eligibility Benefit Request and Response was missing from the list of transactions in <i>Draft Section 3.3 When this Rule Applies</i> .	<b>Adjust.</b>  CAQH CORE Co-chairs and staff will adjust <i>Draft Section 3.3 When this Rule Applies</i> to include X12 v5010X279A1 270/271 Eligibility Request and Response.
4	Section 3.3 When this Rule Applies	One entity commented that because the Draft CAQH CORE Connectivity Rule Update adds requirements to support FHIR-based transactions, the Work Group needs to specify the potential or intended applicability of the CAQH CORE Connectivity Rule Update to non-X12 transaction payloads.	<b>Do not adjust.</b>  The Draft CAQH CORE Connectivity Rule, including <i>Draft Section 3.3 When this Rule Applies</i> , pertains only to exchanges using SOAP message transport. Given FHIR is a RESTful specification, the SOAP requirements do not apply to FHIR-based transactions.  CSWG participants will have the opportunity to provide feedback as the scope and requirements pertaining to REST continue to be researched and developed for Work Group review.

## 9.2 Non-Substantive Comments Received on Part C: Draft Substantive Updates to the Appendix

Table 11 below summarizes non-substantive comments received from CSWG Straw Poll respondents pertaining to Part C: Draft Substantive Updates to Appendix.

**Table 11. Non-Substantive Comments Received on Part C: Draft Substantive Updates to the Appendix**

#	Question	Summary of Comments
<b>Non-Substantive Comments</b>		
1	Section 7.3 Appendix: Interaction Diagrams	One entity clarified that while they support incorporating interaction patterns for transactions that are in scope, they are not able to support the section until their scoping questions are addressed ( <i>see Table 4 of this document for comments pertaining to scope questions</i> ).

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### 9.3 Non-Substantive Comments Received on Part D: Opportunity Areas for Potential REST Requirements

Table 12 below summarizes non-substantive comments received from CSWG Straw Poll respondents pertaining to Part D: Opportunity Areas for Potential REST requirements.

NOTE: There were no non-substantive comments received from CSWG Straw Poll respondents pertaining to Opportunity Area #4: HTTP Methods that were not addressed in other sections or Opportunity Area #5: Error Handling.

**Table 12. Non-Substantive Comments Received on Part D: Opportunity Areas for Potential REST Requirements**

#	Opportunity Area	Summary of Comments
<b>Opportunity Area #1: Payload Types</b>		
1	Opportunity Area 1: Payload Types	One entity commented that their organization currently supports REST with HL7 FHIR only.
2	Opportunity Area 1: Payload Types	One entity noted that the use of some HTTPS requires certification while other do not.  <i>NOTE: This comment was submitted under Opportunity Area #4: HTTP Methods as well.</i>
<b>Opportunity Area #2: Processing Types – Synchronous and Asynchronous</b>		
3	Opportunity Area 2: Processing Mode	One entity commented that they plan to support both real-time and batch in the future, but do not do so today.
<b>Opportunity Area #3: Architecture Constraints</b>		
4	Opportunity Area 3: Architecture Constraint – Versioning Guidelines	Three entities explained their response to Opportunity Area 3: Architecture Constraints – Versioning Guidelines. <ul style="list-style-type: none"> <li>• One of these entities noted that they support a version today in their RESTful interfaces.</li> <li>• Another explained that this is a must-have requirement.</li> <li>• The last explained that they support solutions that reduce complexity and ease implementation but would like to see additional research/analysis before requirements are drafted.</li> </ul>
5	Opportunity Area 3: Architecture Constraint – Data Format Standards	Two entities clarified their response to Opportunity Area 3: Architecture Constraints – Data Format Standards. <ul style="list-style-type: none"> <li>• One of these entities clarified that they support JSON payloads with HL7 FHIR.</li> <li>• Another explained that they before they can support pursuing opportunity areas related to REST and API endpoints, they would like more research to be done and clarification on scope and applicability of this rule.</li> </ul>

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#	Opportunity Area	Summary of Comments
6	Opportunity Area 3: Architecture Constraint – Standards for REST Documentation Requirements	<p>Two entities clarified their response to Opportunity Area 3: Architecture Constraints – Standards for REST Documentation Requirements.</p> <ul style="list-style-type: none"> <li>• One of these entities commented that they support API portals.</li> <li>• Another noted that, assuming the rule dictates the shape of the data, the path and versioning scheme, this section seemed redundant with previous questions in the opportunity area. They clarified that publishing an OpenAPI 3.0 specification for REST services could achieve all the results listed.</li> </ul>
<b>Opportunity Area #6: External API Endpoints</b>		
7	Opportunity Area 6: External API Endpoints	<p>Three entities clarified their response to Opportunity Area 6: External API Endpoints.</p> <ul style="list-style-type: none"> <li>• One entity explained that they directionally support the opportunity area but would like to let the Work Group define the draft requirements.</li> <li>• Another stated that they need more details before they can support the opportunity area.</li> <li>• The last commented that there needs to be flexibility between trading partners to accommodate specific business needs and mitigate unnecessary IT costs and resources for organizations who have already implemented API endpoints.</li> </ul>

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## 10. Appendix B

**Table 1. UPDATED: CAQH CORE Connectivity & Security Work Group Activity Schedule**

<b>Date</b>	<b>Work Group Activity</b>	<b>Topic</b>
Weds 02/26/20 2:00 – 3:30 PM ET	CSWG Call #1	<ul style="list-style-type: none"> <li>▪ Review CSWG workplan and participant expectations.</li> <li>▪ Provide summary of CAQH CORE work on Connectivity completed to date including the recent white paper and requirement options that arose in the Attachments Advisory Group.</li> <li>▪ Orient CSWG to Feedback Form #1.</li> </ul>
Fri 02/28/20 – Fri 03/13/20	CSWG Feedback Form #1	<ul style="list-style-type: none"> <li>▪ Collect information on CSWG support for recommendations to update CAQH CORE Connectivity Rules.</li> </ul>
Weds 04/01/20 2:00 – 3:30 PM ET	CSWG Call #2	<ul style="list-style-type: none"> <li>▪ Review of results of Feedback Form #1.</li> </ul>
Weds 04/29/20 2:00 – 3:30 PM ET	CSWG Call #3	<ul style="list-style-type: none"> <li>▪ Review existing CAQH CORE Connectivity requirements and draft adjustments to SOAP Connectivity Rule scope and requirement sections.</li> <li>▪ Orient CSWG to Straw Poll #1.</li> </ul>
Mon 05/04/20 – Tues 05/19/20	CSWG Straw Poll #1	<ul style="list-style-type: none"> <li>▪ Collect level of support from CSWG on support for draft substantive adjustments to scope and requirement sections of the CAQH CORE Connectivity – SOAP Rule.</li> <li>▪ Collect feedback from CSWG on support for opportunity areas to pursue potential REST requirements.</li> </ul>
Weds 06/03/20 2:00 – 3:30 PM ET	CSWG Call #4	<ul style="list-style-type: none"> <li>▪ Review results from Straw Poll #1.</li> <li>▪ Agree on adjustments to SOAP Rule and REST opportunity areas to pursue.</li> </ul>
Weds 06/24/20 2:00 – 3:30 PM ET	CSWG Call #5	<ul style="list-style-type: none"> <li>▪ Review draft REST scope and requirement sections.</li> <li>▪ Orient CSWG to Straw Poll #2.</li> </ul>
Fri 06/26/20 – Fri 07/10/20	CSWG Straw Poll #2	<ul style="list-style-type: none"> <li>▪ Collect level of support from CSWG on support for draft REST scope and requirement sections of the CAQH CORE Connectivity – REST Rule.</li> </ul>
Weds 07/29/20 2:00 – 3:30 PM ET	CSWG Call #6	<ul style="list-style-type: none"> <li>▪ Review results from Straw Poll #2.</li> <li>▪ Review Draft CAQH CORE Connectivity Rule prior to CSWG Ballot including updated introduction sections</li> </ul>
Fri 08/14/20 – Weds 09/02/20	CSWG Ballot	<ul style="list-style-type: none"> <li>▪ Approve CAQH CORE Connectivity Rule Update.</li> </ul>
Weds 09/09/20 2:00 – 3:30 PM ET	<i>TENTATIVE</i> CSWG Call #7	<ul style="list-style-type: none"> <li>▪ Review of substantive comments received on the CSWG Ballot, as needed.</li> <li>▪ Approve Rule and agree to forward to Final CAQH CORE Vote.</li> </ul>