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## **1. Overview**

### **1.1 Straw Poll Purpose**

The purpose of the straw poll was to collect feedback from the CAQH CORE Phase IV Response Time Rules/Technical Work Group (PIV RWG/TWG) on the substantive updates to the Phase IV CAQH CORE 278 Infrastructure Rule and the Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario prior to completing the formal RWG/TWG Ballot per the [CAQH CORE Voting Process](#).

### **1.2 Additional Background**

The CAQH CORE Phase IV Task Group (PIV TG) launched in Q2 2019 to consider potential enhancements to the Phase IV CAQH CORE 278 Infrastructure Rule that builds on the foundational infrastructure requirements for prior authorization (PA) established by this rule in order to enable shorter overall time to final adjudication of a PA request and more timely delivery of patient care.

From May 2019 to July 2019, the PIV TG completed one impact assessment worksheet and two straw polls that measured the level of support for the potential enhancements and the impact that implementing the enhancements would have on each organization. Additionally, the straw polls provided insight into the PIV TG level of support for the scope of the update, informed the development of the response time requirements under consideration and established specific timeframes for each of the response time requirements. Adjustments to the draft rule were made in accordance with PIV TG straw poll findings and discussions, resulting in a Draft Phase IV 278 Infrastructure Rule Update and associated Draft Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario.

On 08/14/19, the RWG/TWG launched and reviewed the draft requirements and scope pertaining to the updates in preparation for the first RWG/TWG straw poll. After discussing the results of the RWG/TWG's first straw poll on the Work Group's 09/11/19 and 09/26/19 calls, the RWG/TWG agreed to conduct a second straw poll to gather levels of support and feedback from the Work Group prior to completing the formal Work Group Ballot.

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### **1.3 Format of Straw Poll**

The RWG/TWG straw poll consisted of 3 parts:

- **PART A: Draft Updates to Scope**
  - Section 3.4: *Outside the Scope of this Rule*
  
- **PART B: Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements**
  - Draft New Requirements Added to Section 4.4: *Health Care Services Review – Request and Response Batch Processing Mode Response Time Requirements*
  - Draft New Requirements Added to Section 4.5: *Health Care Services Review – Request and Response Real Time Processing Mode Response Time Requirements*
  - Draft New Section 4.6: *Health Care Services Review – Request and Response Request Close Out Requirement*
  
- **PART C: Draft Updates to Phase IV Certification Test Suite – 278 Infrastructure Test Scenario**
  - Draft Updated Section 1.1: *Phase IV CAQH CORE 452 Health Care Services Review – Request and Response (278) Infrastructure Rule Key Requirements*

Parts A and B of the straw poll asked respondents to read Sections 3.4 and 4.4 - 4.6 of the Draft Phase IV 278 Infrastructure Rule Update and indicate their “Support” or “Non-Support” for the substantive edits made to the existing Phase IV 278 Infrastructure Rule. Substantive changes to the requirements were highlighted in grey.

Part C of the straw poll asked respondents to read Section 1.1 of the Draft Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario and indicate their “Support” or “Non-Support” for the substantive edits made to the existing Phase IV Certification Test Suite – 278 Infrastructure Test Scenario. Substantive changes to the Test Suite were highlighted in grey.

## 2. Summary of Straw Poll Respondents

Responses were received from **29** respondents representing **63%** of the PIV RWG/TWG participating organizations.

**NOTE:** Tables containing full straw poll results, including breakdown by stakeholder type, are included in **Appendix A** of this document.

Number of PIV RWG/TWG Participating Entities	46
<b>Total Number of Individual Responses</b>	<b>29 (63% of PIV RWG/TWG Entities)</b>
Number of Provider / Provider Association	7 (24% of respondents)
Number of Health Plan / Health Plan Association	10 (34% of respondents)
Number of Vendor / Clearinghouse Responses	5 (17% of respondents)
Number of Government / Other Responses	7 (24% of respondents)

## 3. Part A: Draft Updates to Scope

Part A of the PIV RWG/TWG straw poll asked respondents to indicate their “Support” or “Non-Support” for the substantive edits made to the draft update to Section 3.4: *Outside the Scope of this Rule*. Respondents were able to provide comments as to why their organization supports or does not support the draft updates, where applicable.

### 3.1 Phase IV RWG/TWG Straw Poll Results: Section 3.4 *Outside the Scope of this Rule*

As a reminder, the following text was added to Section 3.4 *Outside the Scope of this Rule*:

- Section 4.4 *Health Care Services Review – Request and Response Real Time Processing Mode Response Time Requirements* and Section 4.5 *Health Care Services Review – Request and Response Batch Processing Mode Response Time Requirements* do not apply to:
  1. Emergent<sup>10</sup> review request and associated responses.
  2. Urgent review request and associated responses.
  3. Review request and associated responses conducted retrospectively (i.e. neither prospectively<sup>11</sup> nor concurrently<sup>12</sup>).
  4. Review request and associated responses undergoing the Appeals Review Process (internal or external).

<sup>10</sup> The ACA prohibits requirements for prior authorization to access emergency services under section 29 CFR 25900.715-2719A, patient protections. In line with federal law, a growing number of state laws set additional limits around prior authorizations for emergency and urgent care.

<sup>11</sup> In the context of this CAQH CORE rule, “prospective review” is defined as a utilization review conducted before an admission or a course of treatment

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including any required preauthorization or precertification, including extensions of outpatient treatment.

<sup>12</sup> In the context of this CAQH CORE rule, “concurrent review” is defined as a utilization review conducted during a patient’s hospital stay or course of inpatient treatment.

As shown in Table 1 below, the Draft Section 3.4 out of scope language received 85% support from Work Group respondents.

**Table 1. Support for Draft Updates to the Scope of the Phase IV 278 Infrastructure Rule**

Section #	<i>Phase IV RWG/TWG Straw Poll on Draft Phase IV Response Time Requirements</i>	Support	Do Not Support	Abstain #
<b>Part A: Draft Updates to Scope</b>				
3.4	Section 3.4: <i>Outside the Scope of this Rule</i>	22 (85%)	4 (15%)	3

Comments received on the PIV RWG/TWG straw poll were grouped into three categories:

1. **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 RWG/TWG discussion, CAQH CORE staff will make these adjustments, as necessary.
2. **Points of Clarification** – Pertain to areas where more explanation for the RWG/TWG is required; *may* require adjustments to rule but do not change rule requirements.
3. **Substantive Comments** – May impact rule requirements; some comments require RWG/TWG discussion on potential adjustments to the draft requirements.

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The table below summarizes the comments received on Part A of the straw poll. **Bold text** reflects CAQH CORE Co-Chair and Staff recommendations.

**Table 2. Substantive Comments Received on Part A: Draft Updates to the Scope of the Phase IV 278 Infrastructure Rule**

**Note:** No point of clarification comments were received on Part A of the straw poll.

#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
<b>Substantive Comments</b>			
1.	Section 3.4: Outside the Scope of this Rule	<p>Three entities suggested that urgent requests and retrospective review requests should be included in the scope of the update.</p> <ul style="list-style-type: none"> <li>• One of these entities recommended that the response timeframe for urgent requests should be 24 hours.</li> <li>• Another indicated that the timeframe for urgent should be faster but did not specify a timeframe.</li> <li>• The third commented that these requests should be in scope but did not recommend a timeframe.</li> </ul>	<p><b>Do not adjust.</b> Given 85% of the RWG/TWG supported the drafted scope language, CAQH CORE Co-chairs and Staff recommend not adjusting the scope of the update.</p> <p>Urgent, emergent and appeal PA use cases follow different workflows than the typical PAs used for non-urgent or non-emergent PAs because they are often done retrospectively. The retrospective use case follows a different process than concurrent and prospective use cases.</p> <p>CAQH CORE will continue to consider future rule making efforts related to urgent and retrospective PA use cases and development of a standard definition of an urgent PA that could be applied to both Phase IV and Phase V Operating Rules.</p>

## 4. Part B: Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements

Part B of the PIV RWG/TWG straw poll asked respondents to indicate their “Support” or “Non-Support” for the substantive edits made to Sections 4.4 - 4.6 of the Draft Phase IV 278 Infrastructure Rule Update. Respondents were able to provide comments as to why their organization supports or does not support the draft updates.

**NOTE:** Tables containing full straw poll results, including breakdown by stakeholder type, are included in **Appendix A** of this document.

**Table 3. Support for Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements**

Section #	<i>Phase IV RWG/TWG Straw Poll on Draft Phase IV Response Time Requirements</i>	Support	Do Not Support	Abstain #
<b>Part B: Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements</b>				
4.4.3	Section 4.4.3: <i>Time Requirement for Requesting Additional Information/Documentation (Batch Mode)</i>	16 (67%)	8 (33%)	5
4.4.4	Section 4.4.4: <i>Time Requirement for Final Determination (Batch Mode)</i>	19 (76%)	6 (24%)	4
4.5.2	Section 4.5.2: <i>Time Requirement for Requesting Additional Information/Documentation when Known at Time of Request (Real Time Mode)</i>	18 (82%)	4 (18%)	7
4.5.3	Section 4.5.3: <i>Time Requirement for Requesting Additional Information/Documentation when Unknown at Time of Request (Real Time Mode)</i>	15 (65%)	8 (35%)	6
4.5.4	Section 4.5.4: <i>Time Requirement for Final Determination after an Initial Pended Response (Real Time Mode)</i>	16 (67%)	8 (33%)	5
4.6.1	Section 4.6.1: <i>Time Requirements for an ASC X12N v5010 278 Response Close Out Due to a Lack of Requested Information/Documentation</i>	19 (76%)	6 (24%)	4

#### **4.1 Phase IV RWG/TWG Straw Poll Results: Section 4.4 Health Care Services Review – Request and Response Batch Processing Mode Response Time Requirements**

- **Section 4.4.3 – Time Requirement for Requesting Additional Information/Documentation (Batch Mode) – 67% Support on Straw Poll**

When a health plan or its agent pends an ASC X12N v5010 278 Request due to a need for additional information/documentation from the provider or its agent, a health plan or its agent must make available an ASC X12N v5010 278 Response specifying what additional information/documentation is needed to reach a final determination within two business days following submission of the ASC X12N v5010 278 Request.

- **Section 4.4.4 – Time Requirement for Final Determination (Batch Mode) - 76% Support on Straw Poll**

Once a health plan or its agent receives a complete prior authorization request with all information and documentation necessary, including peer to peer medical reviews, if applicable, the health plan or its agent must return either a solicited or unsolicited ASC X12N v5010 278 Response containing an approval or denial within two business days following receipt of the completed prior authorization request.

#### **4.2 Phase IV RWG/TWG Straw Poll Results: Section 4.5 Health Care Services Review – Request and Response Real Time Processing Mode Response Time Requirements**

- **Section 4.5.2 – Time Requirement for Requesting Additional Information/Documentation when Known at Time of Request (Real Time Mode) - 82% Support on Straw Poll**

When a health plan or its agent pends an ASC X12N v5010 278 Request due to a need for additional information/documentation from the provider or its agent, and the additional information/documentation necessary to complete the ASC X12N v5010 278 Request is immediately known by the health plan or its agent, the health plan or its agent must return the pended ASC X12N v5010 278 Response specifying what additional information/documentation is needed to reach a final determination within 20 seconds from the time of receipt of the ASC X12Nv5010 278 Request.



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- **Section 4.5.3 – *Time Requirement for Requesting Additional Information/Documentation when Unknown at Time of Request (Real Time Mode)* - 65% Support on Straw Poll**

After a health plan or its agent has pended the initial ASC X12N v5010 278 Request within 20 seconds from the time of submission due to a need for additional information/documentation, a health plan or its agent must return an unsolicited ASC X12N v5010 278 Response specifying the additional information/documentation needed to reach a final determination within two business days of the initial ASC X12N v5010 278 Request<sup>17</sup>.

<sup>17</sup> An unsolicited ASC X12N v5010 278 Response specifying what additional information/documentation is needed to reach a final determination is only required in cases when the health plan or its agent did not immediately know the information/documentation necessary and return that information with a solicited ASC X12N v5010278 Response within 20 seconds. Therefore, Section 4.4.2 *Time Requirement for Requesting Additional Information/Documentation when Known at Time of Request* and Section 4.4.3 *Time Requirement for Requesting Additional Information/Documentation when Unknown at Time of Request* are mutually exclusive of one another.

- **Section 4.5.4 – *Time Requirement for Final Determination after an Initial Pended Response (Real Time Mode)* – 67% Support on Straw Poll**

After a health plan or its agent has sent an initial pended ASC X12N v5010 278 Response via Real Time Processing Mode, whether within 20 seconds in scenarios when additional information/documentation is immediately known or within two business days when additional information/documentation is not immediately known, a final determination must be sent via an unsolicited ASC X12N v5010 278 Response. Once a health plan or its agent receives a complete prior authorization request with all information and documentation necessary, including peer to peer medical reviews, if applicable, the health plan or its agent must return the unsolicited ASC X12N v5010 278 Response containing an approval or denial within two business days following receipt of the complete prior authorization request.

### 4.3 Phase IV RWG/TWG Straw Poll Results: Section 4.6 Health Care Services Review – Request and Response Close Out Requirement

- Section 4.6.1 – ASC X12N v5010 278 Response Close Out Due to a Lack of Requested Information/Documentation – 76% Support on Straw Poll

A health plan or its agent may choose to close out an ASC X12N v5010 278 Request if a provider or its agent does not respond to a request for additional information/documentation from the health plan or its agent after a minimum of 15 business days following the return of a pended ASC X12N v5010 278 Response requesting additional information/documentation necessary to adjudicate the pended ASC X12N v5010 278 Request.

In the event a health plan or its agent determines to close out an ASC X12N v5010 278 Request due to non-receipt of requested additional information/documentation necessary to adjudicate the pended ASC X12N v5010 278 Request, the health plan or its agent must return an unsolicited ASC X12N v5010 278 Response communicating the prior authorization has been cancelled to the provider or its agent.<sup>18</sup>

<sup>18</sup> A health plan or its agent should specify the processes for the close out ASC X12N v5010 278 Response and any other provider notification in their Companion Guide to ensure business and technical processes are clearly articulated to its trading partner community.

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Table 4 below summarizes comments received on Part B of the straw poll: Draft Updates to the Phase IV 278 Infrastructure Rule Response Time Requirements. **Bold text** reflects CAQH CORE Co-chair and Staff recommendations.

**Table 4. Comments Received on Part B: Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements**

#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
<b>Points of Clarification</b>			
1.	Multiple Sections (4.4.4 and 4.5.4) Time Requirement for Final Determination (Batch and Real Time)	<p>Four entities suggested adjustments to Section 4.4.4 for clarity:</p> <ul style="list-style-type: none"> <li>• Three entities noted that while they support the requirement, they suggest adding a sentence to the introduction of the rule that encourages health plans to respond to PA requests as quickly as possible to support patient care.</li> <li>• One entity suggested removing “if applicable” and “peer to peer medical reviews” from the final determination requirements. They noted that the meaning of “if applicable” could change based on if it is associated with the beginning of the sentence or the end of the sentence. They also commented that in their experience, peer to peer medical reviews are not an option until the PA has been denied.</li> </ul>	<b>Adjust for Clarity.</b> CAQH CORE Staff will add a sentence in the introduction of the rule that encourages health plans to respond to PA requests as quickly as possible to support patient care. CAQH CORE Staff will also remove the phrase ‘if applicable’ from this requirement and clarify that the reference to peer to peer medical reviews after a PA has been denied would be part of the appeal process, which is out of scope for this rule, per the updated scope in Section 3.4 Outside the Scope of this Rule.
2.	Section 4.5.2 Time Requirement for Requesting Additional Information when Known (Real Time)	<p>Two entities recommended adding language that a health plan must return what information is required to complete the PA request if the payer has a published policy that references the required documentation.</p> <p>One of these entities commented that the terms ‘known’ and ‘unknown’ are unclear and that they should either be defined or replaced with the suggested language.</p>	<b>Adjust for clarity.</b> CAQH CORE Staff will add a footnote to this section of the rule noting that a health plan or its agent must communicate what additional information is needed to complete the PA request if the payer has a published policy that references the required documentation (e.g. companion guide, provider billing manuals, etc.)
3.	Section 4.5.4 Time Requirement for Final Determination (Real Time)	One entity commented that the phrase “a complete prior authorization request with all information and documentation necessary” is ambiguous and cannot be measured empirically.	<b>Do not adjust.</b> All information and documentation necessary to complete a prior authorization request refers to the time when a health plan does not require any additional data from the provider in order to determine if a prior authorization is approved or denied.

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#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
4.	Section 4.6.1 Close Out Time Requirement	One entity expressed concern that there are some cases when they are required to wait 45 days to close out a PA request. Therefore, they could not close the request in 15 business days as stated in the close out timeframe requirement.	<b>Do not adjust.</b> Section 4.6.1 of the update is an optional requirement for the health plan. The draft rule language states the health plan “ <i>may choose</i> to close out an ASC X12N v5010 278 Request.” The rule language does not require the health plan to close out the PA but provides for the option to do so after 15 days to ensure a complete accounting: all 278 Request transactions received have a corresponding 278 Response transaction.
5.	Section 4.6.1 Close Out Time Requirement	Two entities suggested adjustments to Section 4.6.1 – Close Out Time Requirement for clarity. <ul style="list-style-type: none"> <li>• One entity recommended defining ‘close out’ to ensure that if a PA request is closed out, providers will be able to resubmit the request.</li> <li>• Another noted that Footnote 18 limits posting the close out information to companion guides, when a health plan should have the information in their policies, especially if they do not have a companion guide for the transaction.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Adjust for clarity.</b> While the Phase IV CORE Rules do not include requirements for data content and therefore do not specify definitions for the cancelled or denied prior authorizations, CAQH Staff will add a footnote to clarify that health plans should define the process for resubmission and appeals in a companion guide, provider billing manual, etc. Moreover, the health plan or its agent should respond to the 278 Request using the most appropriate code for the cancellation. CAQH CORE Staff will develop FAQs to provide additional industry education on this topic.</li> <li>• <b>Adjust for clarity.</b> CAQH CORE Staff will adjust Footnote 18 to include a broader range of documentation where the close out information could be posted including, provider billing manuals and additional organization policy manuals.</li> </ul>

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Substantive Comments		
1.	Section 4.4.3 Time Requirement for Requesting Additional Information (Batch)	<p>Six entities suggested timeframes other than two business days for the health plan to communicate to the provider what additional information/documentation is necessary to make a final determination, when the request is submitted in Batch Processing Mode.</p> <ul style="list-style-type: none"> <li>• One of these entities requested a longer timeframe but did not specify the maximum response time.</li> <li>• Another commented that payers should be urged to return the information as soon as possible.</li> <li>• Another suggested 24 hours as the maximum timeframe.</li> <li>• Another suggested three to four business days.</li> <li>• Another commented that five business days is appropriate.</li> <li>• Another recommended ten calendar days.</li> </ul>
2.	Section 4.4.3 Time Requirement for Requesting Additional Information (Batch)	<p>One entity recommended that, similar to the real time requirements (Sections 4.5.2 and 4.5.3), there should be two separate timeframes for requesting additional information in Batch Processing Mode because health plans immediately know what information/documentation is necessary for providers to complete a PA request:</p> <ul style="list-style-type: none"> <li>• When unsolicited information/documentation is included in the 278 Request sent via Batch Processing Mode, the health plan must review the information and respond to the provider within two business days with the additional information needed to complete the PA request.</li> <li>• When unsolicited information/documentation is not included in the 278 Request sent via Batch Processing Mode, the health plan has must communicate to the provider what additional information/documentation is necessary to complete the PA request by the next business morning.</li> </ul>

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3.	Section 4.4.4 Time Requirement for Final Determination (Batch)	<p>Five entities suggested timeframes other than two business days for health plans to make a final determination once all information/documentation has been received.</p> <ul style="list-style-type: none"> <li>• One of these entities commented the timeframe should be 48 hours instead of two business days.</li> <li>• Another suggested three to four business days.</li> <li>• Another commented that five business days is appropriate.</li> <li>• Another recommended ten calendar days.</li> <li>• The fifth entity requested a longer timeframe but did not specify the maximum response time.</li> </ul>	<p><b>Do not adjust.</b> 76% of the Work Group straw poll respondents supported the requirement, as written. Additionally, the timeframes recommended by these entities illustrate the wide variability in response timeframes being used throughout the industry without clear consensus on an alternative timeframe.</p> <p>Therefore, CAQH CORE Co-chairs and Staff recommend moving forward with two business days as the timeframe for final determination of a PA submitted in Batch Processing Mode.</p>
4.	Section 4.5.3 Time Requirement for Requesting Additional Information when Unknown (Real Time)	<p>Seven entities suggested timeframes other than two business days for the health plan to communicate to the provider what additional information/documentation is necessary to make a final determination in real time mode.</p> <ul style="list-style-type: none"> <li>• One entity explained that a two day blanket policy does not consider the differences in PA requests but did not suggest a maximum timeframe.</li> <li>• Another noted that the timeframe should be shortened but did not suggest a maximum timeframe.</li> <li>• Another said that health plan should immediately know what information is needed and the response should be in real time.</li> <li>• Another recommended 24 hours as the maximum timeframe.</li> <li>• Another suggested three to four days as the maximum timeframe.</li> <li>• Another commented that five business days is appropriate.</li> <li>• The seventh commented that Medicare FFS has up to ten calendar days to make a decision on a PA request.</li> </ul>	<p><b>Do not adjust.</b> 65% of the Work Group straw poll respondents supported the requirement, as written. Additionally, the timeframes recommended by these entities illustrate the wide variability in response timeframes being used throughout the industry without clear consensus on an alternative timeframe.</p> <p>Therefore, CAQH CORE Co-chairs and Staff recommend moving forward with two business days as the timeframe for health plans to communicate to the provider what additional information/documentation is necessary to make a final determination.</p>

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5.	Section 4.5.4 Time Requirement for Final Determination (Real Time)	<p>Six entities suggested timeframes other than two business days.</p> <ul style="list-style-type: none"> <li>• One entity stated that health plans should respond to a PA request as quickly as possible.</li> <li>• Another noted that two days is too short to perform a manual review but did not suggest a maximum timeframe.</li> <li>• Another noted that NCQA and other guideline allow up to 15 days to make a final determination but did not suggest a maximum timeframe.</li> <li>• Another suggested three to four days as the response time.</li> <li>• Another recommended five business days as the response time.</li> <li>• The sixth commented that Medicare FFS has up to ten calendar days to make a decision on a PA request.</li> </ul>	<p><b>Do not adjust.</b> Given 67% of the Work Group straw poll respondents supported the requirement timeframe, and the response timeframes suggested by these entities represent the wide variability in response timeframes being used throughout the industry, CAQH CORE Co-chairs and Staff recommend moving forward with two business days as the timeframe for final determination in real time mode.</p>
6.	Section 4.6.1 Close Out Time Requirement	<p>Two entities supported a timeframe other than 15 business days for the Close Out Time Requirement.</p> <ul style="list-style-type: none"> <li>• One entity said that 15 days is an excessive amount of time to return documentation, even via snail mail.</li> <li>• The other entity noted that the same urgency that is applied to health plans to respond to a PA request should be applied to the provider’s submission of supporting documentation to the health plan. They further commented that the 15 business days timeframe for providers to send in additional documentation should be the same timeframe granted to health plans to make a final determination.</li> </ul>	<p><b>Do not adjust.</b> 76% of the Work Group voted in support of the Close Out Time Requirement, therefore CAQH CORE Co-chairs and Staff recommend moving forward with 15 business days as the timeframe for the requirement.</p> <p>As noted previously, this is an optional requirement for health plans as the draft rule language states that the health plan “<i>may choose</i> to close out an ASC X12N v5010 278 Request.” The rule language does not require the health plan to close out the PA but provides for the option to do so after 15 days to ensure a complete accounting: all 278 Request transactions received have a corresponding 278 Response transaction.</p>
7.	Section 4.6.1 Close Out Time Requirement	<p>One entity recommended adding a requirement that health plans must provide notice to providers indicating that the time to submit the additional documentation is closing.</p>	<p><b>Do not adjust.</b> While the current draft of the rule does not specify that a health plan or its agent must send a notification to the provider indicating that the information necessary to complete the PA has not been received and that he timeframe to submit the additional</p>

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			<p>information is closing, it does not prohibit the health plan from sending a reminder prior to the close out period.</p> <p>Additionally, Footnote 18 in Section 4.6.1 states that, “a health plan or its agent should specify the processes for the close out ASC X12N v5010 278 Response and any other provider notification in their Companion Guide to ensure business and technical processes are clearly articulated to its trading partner community.</p>
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## 5. Part C: Draft Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario

This part of the straw poll asked respondents to review the updated Phase IV Certification Test Suite language pertaining to the key rule requirements for the Phase IV 278 Infrastructure Test Scenario.

### 5.1 Phase IV RWG/TWG Straw Poll Results: Draft Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario

**Table 5. Support for Updates to the Draft Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario**

Section #	PIV RWG/TWG Straw Poll on <i>DRAFT Phase IV Certification Test Suite Updates</i>	Support	Do Not Support	Abstain #
<b>Part C: Draft Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario</b>				
1.1	Section 1.1: <i>Phase IV CAQH CORE 452 Health Care Services Review – Request and Response (278) Infrastructure Rule Key Requirements</i>	14 (70%)	6 (30%)	9



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**Table 6. Comments Received on Part C: Draft Updates to the Phase IV Certification Test Suite – 278 Infrastructure Test Scenario**

#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
<b>Points of Clarification</b>			
1.	1.1 Cert Test Suite – 278 Infrastructure Test Scenario	<p>Three entities suggested adjustments to the Certification Test Suite for clarity.</p> <ul style="list-style-type: none"> <li>• One entity noted that on page four, bullet seven does not reference batch or real time processing, but bullet nine does. They suggested removing bullet seven since the requirement is identical for both batch and real time.</li> <li>• One entity asked whether the first bullet of the User Acknowledgement Requirements needs to clarify that the 278 Real Time Response is not rejected for implementation guide conformance. They note that real time could still return a 278 response with an application validation/processing error.</li> <li>• Another commented that Footnote 1 limits posting the close out information to companion guides, when a health plan should have the information in organizational policies, especially if they do not have a companion guide for the transaction.</li> </ul>	<p><b>Adjust for clarity.</b> CAQH CORE Staff will adjust the Phase IV Certification Test Suite Update – 278 Infrastructure Scenario to reflect the changes agreed to through today’s RWG/TWG discussions regarding the Phase IV 278 Infrastructure Rule Update as well as the adjustments for clarification suggested by the commenters.</p>

## 6. Next Steps

Next steps for the Phase IV RWG/TWG for the *Draft Phase IV 278 Infrastructure Rule Update* include:

- CAQH CORE Co-chairs and Staff will:
  - Implement adjustments to the *Draft Phase IV 278 Infrastructure Rule Update* based on PIV RWG/TWG discussion and comments.
  - Send RWG/TWG Ballot on the *Draft Phase IV 278 Infrastructure Rule Update* and *Draft Certification Test Suite Update – 278 Infrastructure Test Scenario* by **Monday 10/21/19, end of day.**
- CAQH CORE PIV RWG/TWG Participants will:
  - Complete the RWG/TWG Ballot by **Friday 11/01/19, end of day.**
  - Participate in the 5<sup>th</sup> RWG/TWG Call on **Wednesday 11/06/19 from 2:30PM – 4:00PM** where the Work Group will discuss any substantive adjustments to the *Draft Phase IV 278 Infrastructure Rule Update* and *Draft Certification Test Suite Update – 278 Infrastructure Test Scenario*. If RWG/TWG quorum and approval requirements are met per the [CAQH CORE Voting Process](#), the fifth call will be cancelled via email and the ballot results and rule adjustments will move forward to the Final CORE Vote.

## 7. Appendix

### Appendix A: Percent Support, by Section

Table 1: Percent Support for Updates to Scope and Response Time Requirements, by Section

Section #	Phase IV RWG/TWG Straw Poll on Draft Phase IV Response Time Requirements	Support	Do Not Support	Abstain #
<b>Part A: Draft Updates to Scope</b>				
3.4	Section 3.4: <i>Outside the Scope of this Rule</i>	22 (85%)	4 (15%)	3
<b>Part B: Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements</b>				
4.4.3	Section 4.4.3: <i>Time Requirement for Requesting Additional Information/Documentation (Batch Mode)</i>	16 (67%)	8 (33%)	5
4.4.4	Section 4.4.4: <i>Time Requirement for Final Determination (Batch Mode)</i>	19 (76%)	6 (24%)	4
4.5.2	Section 4.5.2: <i>Time Requirement for Requesting Additional Information/Documentation when Known at Time of Request (Real Time Mode)</i>	18 (82%)	4 (18%)	7
4.5.3	Section 4.5.3: <i>Time Requirement for Requesting Additional Information/Documentation when Unknown at Time of Request (Real Time Mode)</i>	15 (65%)	8 (35%)	6
4.5.4	Section 4.5.4: <i>Time Requirement for Final Determination after an Initial Pended Response (Real Time Mode)</i>	16 (67%)	8 (33%)	5
4.6.1	Section 4.6.1: <i>Time Requirements for an ASC X12N v5010 278 Response Close Out Due to a Lack of Requested Information/Documentation</i>	19 (76%)	6 (24%)	4
<b>Part C: Draft Updates to the Phase IV Certification Test Suite</b>				
1.1	Section 1.1: <i>Phase IV CAQH CORE 452 Health Care Services Review – Request and Response (278) Infrastructure Rule Key Requirements</i>	14 (70%)	6 (30%)	9

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**Table 2: Percent Support for Updates to Scope and Response Time Requirements, by Section – Stakeholder Breakdown**

Rule Section		Support	Do Not Support	Abstain #
<b>PART A: Draft Updates to Scope</b>				
<b>Sect 3.4</b>	<b>Outside the Scope of this Rule</b>	<b>22 (85%)</b>	<b>4 (15%)</b>	<b>3</b>
	Provider/Provider Association	4 (57%)	3 (43%)	0
	Health Plan/Health Plan Association	9 (100%)	0 (0%)	1
	Vendor/Clearinghouse	4 (100%)	0 (0%)	1
	Government/Other	5 (83%)	1 (17%)	1
<b>PART B: Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements</b>				
<b>Sect 4.4.3</b>	<b>Time Requirement for Requesting Additional Info (Batch)</b>	<b>16 (67%)</b>	<b>8 (33%)</b>	<b>5</b>
	Provider/Provider Association	4 (57%)	3 (43%)	0
	Health Plan/Health Plan Association	7 (88%)	1 (12%)	2
	Vendor/Clearinghouse	3 (75%)	1 (25%)	1
	Government/Other	2 (40%)	3 (60%)	2
<b>Sect 4.4.4</b>	<b>Time Requirement for Final Determination (Batch)</b>	<b>19 (76%)</b>	<b>6 (24%)</b>	<b>4</b>
	Provider/Provider Association	6 (86%)	1 (14%)	0
	Health Plan/Health Plan Association	7 (88%)	1 (12%)	2
	Vendor/Clearinghouse	3 (75%)	1 (25%)	1
	Government/Other	3 (50%)	3 (50%)	1
<b>Sect 4.5.2</b>	<b>Time Requirement for Requesting Additional Info when Known (Real Time)</b>	<b>18 (82%)</b>	<b>4 (18%)</b>	<b>7</b>
	Provider/Provider Association	7 (100%)	0 (0%)	0
	Health Plan/Health Plan Association	7 (100%)	0 (0%)	3
	Vendor/Clearinghouse	3 (75%)	1 (25%)	1
	Government/Other	1 (25%)	3 (75%)	3

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<b>Sect 4.5.3</b>	<b>Time Requirement for Requesting Additional Info when Unknown (Real Time)</b>	<b>15 (65%)</b>	<b>8 (35%)</b>	<b>6</b>
	Provider/Provider Association	4 (57%)	3 (43%)	0
	Health Plan/Health Plan Association	7 (88%)	1 (12%)	2
	Vendor/Clearinghouse	3 (75%)	1 (25%)	1
	Government/Other	1 (25%)	3 (75%)	3
<b>Sect 4.5.4</b>	<b>Time Requirement for Final Determination (Real Time)</b>	<b>16 (67%)</b>	<b>8 (33%)</b>	<b>5</b>
	Provider/Provider Association	5 (71%)	2 (29%)	0
	Health Plan/Health Plan Association	6 (75%)	2 (25%)	2
	Vendor/Clearinghouse	3 (75%)	1 (25%)	1
	Government/Other	2 (40%)	3 (60%)	2
<b>Sect 4.6.1</b>	<b>Time Requirement for 278 Response Close Out Due to Lack of Requested Info</b>	<b>19 (76%)</b>	<b>6 (24%)</b>	<b>4</b>
	Provider/Provider Association	5 (83%)	1 (17%)	1
	Health Plan/Health Plan Association	8 (89%)	1 (11%)	1
	Vendor/Clearinghouse	4 (100%)	0 (0%)	1
	Government/Other	2 (33%)	4 (67%)	1
<b>PART C: Draft Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario</b>				
<b>Sect 1.1</b>	<b>Phase IV CAQH CORE 452 Health Care Services Review – Request and Response (278) Infrastructure Rule Key Requirements</b>	<b>14 (70%)</b>	<b>6 (30%)</b>	<b>9</b>
	Provider/Provider Association	5 (100%)	0 (0%)	2
	Health Plan/Health Plan Association	5 (71%)	2 (29%)	3
	Vendor/Clearinghouse	3 (75%)	1 (25%)	1
	Government/Other	1 (25%)	3 (75%)	3

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**Appendix B: Non-substantive Comments Received on the Straw Poll**

**Table 1. Non-Substantive Comments Received on Part A: Draft Updates to Scope**

#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
<b>Non-Substantive Comments</b>			
1.	3.4 Outside the Scope of this Rule	One entity noted that they can support whatever is decided by the Work Group and abstained from the vote.	N/A

**Table 2. Non-Substantive Comments Received on Part B: Draft Phase IV 278 Response Time Requirements**

#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
<b>Non-Substantive Comments</b>			
1.	All Sections	One entity commented that they do not conduct the 278 transaction.	While entities may not conduct the 278 transaction because they have not received a 278 Request from a provider, health plans must have the capability to return a 278 Response if requested by the provider.
2.	Multiple Sections (4.4.3; 4.4.4;4.5.3;4.5.4)	One entity commented that their organization uses PA as a utilization tool for cost control and fraud protection, not administrative simplification. They also noted that the increase in staff resources that would be needed to comply with the requirements presents a significant financial burden to their organization.	N/A
3.	Section 4.5.3 Time Requirement for Requesting Additional Information when Unknown (Real Time)	One entity expressed confusion as to how a health plan would not know what documentation is needed to support one of their policies and why it would take up to two days to return the information.	N/A
4.	4.5.2 Time Requirement for Requesting Additional Info when Known (Real Time)	Two entities indicated that their organization can't determine if specific documentation is needed to make a final determination within 20 seconds and a pend is the only response they would be able to send back to providers.	N/A

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#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
4.	4.5.4 Time Requirement for Final Determination (Real Time)	One entity supported the rule requirement as written.	N/A
5.	4.6.1 Close Out Time Requirement	Two entities supported the rule requirement as written.	N/A

**Table 3. Non-Substantive Comments Received on Part C: Draft Phase IV Certification Test Suite Update – 278 Infrastructure Test Scenario**

#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
<b>Non-Substantive Comments</b>			
1.	1.1 Cert Test Suite – 278 Infrastructure Test Scenario	Two entities noted that they would not support the portions of the testing that refer to the requirements that were not supported.	N/A

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Straw Poll 2 Results: *DRAFT Phase IV 278 Infrastructure Rule & Certification Test Suite Update***

**Appendix C: Updated PIV RWG/TWG Activity Schedule**

**Table 1. Updated PIV RWG/TWG Activity Schedule**

Date	RWG/TWG Activity
<b>Wednesday 08/14/19</b> <b>2:30 – 4:00pm ET</b>	<b>RWG/TWG Call #1</b> <ul style="list-style-type: none"> <li>• Review the <i>Draft Phase IV CAQH CORE 278 Infrastructure Rule Update</i> developed by the PIV TG.</li> <li>• Review proposed adjustments to the <i>DRAFT CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i>.</li> <li>• Discuss next steps, including RWG/TWG Straw Poll #1.</li> </ul>
<b>Monday 08/19/19 - Tuesday 09/03/19</b>	<b>RWG/TWG Straw Poll #1</b> <ul style="list-style-type: none"> <li>• Provide organization’s support/lack of support on each section of the <i>DRAFT Phase IV CAQH CORE 278 Infrastructure Rule Update</i>.</li> <li>• Provide organization’s support/lack of support on each section of the <i>DRAFT Phase IV CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i>.</li> </ul>
<b>Wednesday 09/11/19</b> <b>2:30 – 4:00pm ET</b>	<b>RWG/TWG Call #2</b> <ul style="list-style-type: none"> <li>• Review results of RWG/TWG Straw Poll #1 and discuss substantive comments and points of clarification.</li> <li>• Agree to adjustments to the <i>DRAFT Phase IV CAQH CORE 278 Infrastructure Rule Update</i> and <i>DRAFT Phase IV CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i>.</li> </ul>
<b>Thursday 09/26/19</b> <b>2:30 – 3:30pm ET</b>	<b>RWG/TWG Call #3</b> <ul style="list-style-type: none"> <li>• Continue reviewing the results of RWG/TWG Straw Poll #1 and discuss substantive comments and points of clarification.</li> <li>• Agree to adjustments to the <i>DRAFT Phase IV CAQH CORE 278 Infrastructure Rule Update</i> and <i>DRAFT Phase IV CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i>.</li> <li>• Discuss next steps including the RWG/TWG Straw Poll 2.</li> </ul>
<b>Monday 09/30/19 - Friday 10/11/19</b>	<b>RWG/TWG Straw Poll #2</b> <ul style="list-style-type: none"> <li>• Provide organization’s support/lack of support on each section of the <i>DRAFT Phase IV CAQH CORE 278 Infrastructure Rule Update</i>.</li> <li>• Provide organization’s support/lack of support on each section of the <i>DRAFT Phase IV CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i>.</li> </ul>

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Straw Poll 2 Results: *DRAFT Phase IV 278 Infrastructure Rule & Certification Test Suite Update***

<p><b>Thursday 10/17/19</b> <b>2:30 – 4:00pm ET</b></p>	<p><b>RWG/TWG Call #4</b></p> <ul style="list-style-type: none"> <li>Review results of RWG/TWG Straw Poll #2 and discuss substantive comments and points of clarification.</li> <li>Agree to adjustments to the <i>DRAFT Phase IV CAQH CORE 278 Infrastructure Rule Update</i> and <i>DRAFT Phase IV CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i>.</li> <li>Discuss next steps including the RWG/TWG Ballot.</li> </ul>
<p><b>Monday 10/21/19 - Friday 11/01/19</b></p>	<p><b>RWG/TWG Ballot</b></p> <ul style="list-style-type: none"> <li>Provide organization’s vote for the <i>DRAFT Phase IV CAQH CORE 278 Infrastructure Rule Update</i>.</li> <li>Provide organization’s vote for the <i>DRAFT Phase IV CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i>.</li> </ul>
<p><b>Wednesday 11/06/19</b> <b>2:30 – 4:00pm ET</b></p>	<p><b>TENTATIVE: RWG/TWG Call #5</b></p> <ul style="list-style-type: none"> <li>Review results of the RWG/TWG Ballot and agree to any substantive adjustments to the <i>DRAFT Phase IV CAQH CORE 278 Infrastructure Rule Update</i> and the <i>DRAFT Phase IV CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i>.</li> <li>Agree to move the <i>DRAFT Phase IV CAQH CORE 278 Infrastructure Rule Update</i> and <i>DRAFT Phase IV CAQH CORE Certification Test Suite – 278 Infrastructure Test Scenarios Update</i> to the Final CORE Participant Vote.</li> </ul>