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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 build 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 the current 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 this straw poll.

### 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 Real Time Processing Mode Response Time Requirements*
  - Draft New Requirements Added to Section 4.5: *Health Care Services Review – Request and Response Batch Processing Mode Response Time Requirements*
  - Draft New Section 4.6: *Health Care Services Review – Request and Response Request Close Out Requirement*

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- **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 **62%** 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	47
<b>Total Number of Individual Responses</b>	<b>29 (62% of PIV RWG/TWG Entities)</b>
Number of Provider / Provider Association	6 (21% of respondents)
Number of Health Plan / Health Plan Association	10 (35% of respondents)
Number of Vendor/Clearinghouse Responses	7 (24% of respondents)
Number of Government Responses	3 (10% of respondents)
Number of ‘Other’ Responses (Includes Standards Organizations)	3 (10% 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> and urgent review request and associated responses.
  2. Review request and associated responses conducted retrospectively (i.e. neither prospectively<sup>11</sup> nor concurrently<sup>12</sup>).
  3. 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 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 **91%** 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>	21 (91%)	2 (9%)	6

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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.

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

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

#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
<b>Points of Clarification</b>			
1.	Section 3.4: Outside the Scope of this Rule	One entity recommended that footnote 10 be adjusted to clarify that emergent and urgent services are different use cases.	<b>Adjust for clarity.</b> CAQH CORE Staff will separate emergent and urgent into two separate rows to ensure distinction between use cases.
<b>Substantive Comments</b>			
1.	Section 3.4: Outside the Scope of this Rule	One entity suggested that urgent prior authorization use cases should be included as in-scope for this update and that the processing timeframe for urgent cases should be 24 hours.	<b>Do not adjust.</b> Given 91% of the RWG/TWG supported the drafted scope language, CAQH CORE Staff and Co-chairs recommend not adjusting the scope of the update.  Urgent, emergent and appeal PA use cases follow different workflows than the typical PA used for non-urgent or non-emergent PAs because they are often done retrospectively.  CAQH CORE will consider future rule making efforts related to urgent PA requests and responses and the development of a standard definition of an urgent PA that would apply to both Phase IV and Phase V Operating Rules.

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## 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>				
4.4.2	Section 4.4.2: <i>Time Requirement for Requesting Additional Information/Documentation when Known at Time of Request (Real Time Mode)</i>	18 (78%)	5 (22%)	6
4.4.3	Section 4.4.3: <i>Time Requirement for Requesting Additional Information/Documentation when Unknown at Time of Request (Real Time Mode)</i>	16 (67%)	8 (33%)	5
4.4.4	Section 4.4.4: <i>Time Requirement for Final Determination after an Initial Pended Response (Real Time Mode)</i>	14 (58%)	10 (42%)	5
4.5.3	Section 4.5.3: <i>Time Requirement for Requesting Additional Information/Documentation (Batch Mode)</i>	17 (74%)	6 (26%)	6
4.5.4	Section 4.5.4: <i>Time Requirement for Final Determination (Batch Mode)</i>	15 (63%)	9 (37%)	5
4.6.1	Section 4.6.1: <i>ASC X12N v5010 278 Response Close Out Due to a Lack of Requested Information/Documentation</i>	17 (71%)	7 (29%)	5
4.6.2	Section 4.6.2: <i>ASC X12N v5010 278 Response Close Out Due to a Lack of Requested Information/Documentation Time Requirement</i>	15 (65%)	8 (35%)	6

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

- **Section 4.4.2 – Time Requirement for Requesting Additional Information/Documentation when Known at Time of Request (Real Time Mode) - 78% 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 missing 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.

- **Section 4.4.3 – Time Requirement for Requesting Additional Information/Documentation when Unknown at Time of Request (Real Time Mode) - 67% Support on Straw Poll**

After sending the initial, pended ASC X12N v5010 278 Response within 20 seconds from the time of submission of the ASC X12N v5010 278 Request due to a need for additional information/documentation, a health plan or its agent must return an unsolicited ASC X12N v5010 278 Response specifying what additional information/documentation is needed to reach a final determination. The maximum response time requires that requests received by 9:00pm Eastern Time of a business day must be responded to no later than 7:00am Eastern Time the second business day following submission.

- **Section 4.4.4 – Time Requirement for Final Determination after an Initial Pended Response (Real Time Mode) – 58% Support on Straw Poll**

Once a health plan or its agent has sent an initial pended ASC X12N v5010 278 Response via Real Time Processing Mode, 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 an unsolicited ASC X12N v5010 278 Response containing an approval or denial. The maximum response time requires that requests received by a health plan or its agent by 9:00pm Eastern Time on a business day must be responded to no later than 7:00am Eastern Time on the second business day following submission.

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

- **Section 4.5.3 – Time Requirement for Requesting Additional Information/Documentation (Batch Mode) – 74% 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. The maximum response time when utilizing Batch Processing Mode requires that X12N v5010 278 Requests received by the health plan or its agent by 9:00pm Eastern Time on a business day must be responded to no later than 7:00am Eastern Time the second business day following submission.

- **Section 4.5.4 – Time Requirement for Final Determination (Batch Mode) - 63% 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 a solicited or unsolicited ASC X12N v5010 278 Response containing an approval or denial. The maximum response time when utilizing Batch Processing Mode requires that X12N v5010 278 Requests received by a health plan or its agent by 9:00pm Eastern Time on a business day must be responded to no later than 7:00am Eastern Time on the second business day following submission.

## **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 – 71% Support on Straw Poll**

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 a solicited or unsolicited ASC X12N v5010 278 Response communicating the prior authorization has been cancelled to the provider or its agent.

- **Section 4.6.2 – ASC X12N v5010 278 Response Close Out Due to a Lack of Requested Information/Documentation Time Requirement - 65% 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 the additional information/documentation necessary to adjudicate the pended ASC X12N v5010 278 Request.



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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 Staff and Co-chair 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.	4.4.2 Time Requirement for Requesting Additional Information when Known (Real Time)	One entity asked for clarity as to whether the 20 second response timeframe is the time it takes for the 278 Response to leave the health plan or its agents' system or if it also includes transit time to arrive back to the provider.	The existing Phase IV 278 Infrastructure Rule specifies that the maximum response time for the receipt of an ASC X12N v5010 278 Response from the time of submission of an ASC X12N v5010 278 Request must be 20 seconds <b>total roundtrip</b> when processing in Real-Time Mode; it includes a recommendation that each hop between trading partners last no more than 4 seconds.
2.	4.4.2 Time Requirement for Requesting Additional Information when Known (Real Time)	One entity suggested adjusting the verbiage in Section 4.4.2 to provide more clarity around the specific situations in which this requirement would apply. They recommended that CORE change the wording of the title to "when clinical documentation review is not needed at time of request" rather than "when unknown".	<b>Adjust for clarity.</b> CAQH CORE Staff will update the Draft Rule for clarity.
3.	Multiple Sections (4.4.3; 4.4.4; 4.5.3; 4.6.1)	One entity asked whether the CAQH CORE Connectivity rules support an unsolicited 278 Response.	<b>Adjust for clarity.</b> Similar to the Phase III 835 Infrastructure Rule approach, CAQH CORE Staff will publish sequence diagrams for the unsolicited 278 Response in an FAQ to provide additional industry education on this topic.
4.	4.4.3 Time Requirement for Requesting Additional Information when Unknown (Real Time)	Two entities recommended adjusting Section 4.4.3 for clarity. <ul style="list-style-type: none"> <li>• One of these entities suggested that Section 4.4.3 should reference Section 4.4.2 in order to clarify that the unsolicited response back to the provider would only be needed if the additional information was not known immediately, that the two sections are mutually exclusive.</li> <li>• Another entity suggested adjusting the verbiage in Section 4.4.3 to "when clinical documentation</li> </ul>	<b>Adjust for clarity.</b> CAQH CORE Staff will add a footnote to Section 4.4.3 with the suggested reference to Section 4.4.2 and adjust language in Section 4.4.3 for clarity.

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#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
		review is needed at time of request” instead of “when unknown at the time of request”.	
5.	Multiple Sections (4.4.4; 4.5.4) Final Determination Requirements	<p>Three entities requested adjustments to the language in Sections 4.4.4 and 4.5.4 for clarity.</p> <ul style="list-style-type: none"> <li>• One entity recommended clarifying that the final determination time requirement applies both in cases when the health plan requested additional information and in cases where no additional information was required after the initial request.</li> <li>• One entity suggested revising the requirement to avoid the interpretation that a provider must send a second 278 Request.</li> <li>• One entity expressed confusion about what additional information/documentation was being requested by the health plan. They also asked for clarification as to what happens when the additional information is not sent via an X12 transaction.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Adjust for clarity.</b> CAQH CORE will switch the order of the Real-Time Sections (currently Sections 4.4.3 and 4.4.4) with the Batch Sections (currently Sections 4.5.3 and 4.5.4) for clarity given batch processing is more common with the 278 transaction. CAQH CORE will also adjust the draft rule language for clarity.</li> <li>• <b>Adjust for clarity.</b> CAQH CORE will switch the order of the Real-Time Processing Mode Sections (currently Sections 4.4.3 and 4.4.4) with the Batch Processing Mode Sections (currently Sections 4.5.3 and 4.5.4) for clarity given batch processing is more common with the 278 transaction. CAQH CORE will also adjust the draft rule language for clarity.</li> <li>• The Phase IV 278 Infrastructure Rule addresses the use and conduct of the 5010X217 278 as the HIPAA-mandated transaction for prior authorizations. Regardless of whether the initial PA inquiry is made via Real Time or Batch Processing, a fully finalized 278 Response transaction should be made available to the inquiring provider when the final determination is completed by the health plan – it should not require the use of a non-HIPAA mandated transaction to complete the notification process. However, any back and forth between health plan and provider that is necessary to reach a final determination may be done outside the use of the 278 transaction. Once the final determination is made, it must be sent via a solicited or unsolicited 5010X217 278 transaction to the provider.</li> </ul>
6.	4.6.2 Close Out Time Requirement	Four entities suggested edits to the requirement for clarity.	<ul style="list-style-type: none"> <li>• <b>Adjust for clarity.</b> CAQH CORE Staff will merge Sections 4.6.1 and 4.6.2 into one section for clarity.</li> </ul>

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#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
		<ul style="list-style-type: none"> <li>• Two entities stated that the Work Group needs to determine the time requirement before it is closed out due to non-receipt of requested information. One of these entities suggested merging sections 4.6.1 and 4.6.2 (Close Out Requirements) for clarity.</li> <li>• One entity asked that the rule define the terms 'cancelled' and 'denied' so the two terms aren't used interchangeably. Another entity commented that the current language implies that a health plan or its agent must return an HCR01=C (Cancelled) but noted this is often not the most appropriate 278 Response.</li> <li>• One entity suggested adjusting the requirement to specify that an unsolicited 278 Response must be returned because there would never be a solicited 278 Response in this workflow.</li> </ul>	<ul style="list-style-type: none"> <li>• 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. 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 the requirement as recommended.</li> </ul>

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Substantive Comments			
1.	Multiple Sections (4.4.3; 4.4.4; 4.5.3; and 4.5.4)	Four entities expressed confusion about the business day verbiage included in multiple sections of the rule.	<b>Adjust.</b> CAQH CORE will remove the specific time references (7:00 AM and 9:00 PM) included in Sections 4.4.3, 4.4.4, 4.5.3 and 4.5.4 and adjust the maximum response timeframe to two-business days from time of receipt of the 278 Request to improve clarity around the two-business day timeframe.
2.	4.4.3 Time Requirement for Requesting Additional Information when Unknown (Real Time)	<p>Five entities requested timeframes other than 2 business days for the health plan to communicate what information/documentation is needed from the provider to complete the PA Request, when the request is submitted in Real Time Processing Mode.</p> <ul style="list-style-type: none"> <li>• One entity noted that the timeframe is too short to perform manual reviews on PAs and compose a response to the provider but didn't suggest a different timeframe.</li> <li>• Another suggested a timeframe of 24 hours for manual review of unsolicited documentation.</li> <li>• Another recommended 3 to 4 days, as imposing any timeframe requirement to determine clinical data needs related to PA requests in Real-Time or Batch does not recognize the current state of PA processes and clinical management tools.</li> <li>• One commented that the response time should be dictated by the level of service, as specified in the UM06, and that elective routine services should not force a 24 – 48 hour response time. This comment applies to all response times included in the update (Sections 4.4.3; 4.4.4; 4.5.3 and 4.5.4).</li> <li>• One entity noted that emerging technology such as FHIR-Da Vinci and CMS' DRLS Initiative is expediting the receipt of additional documentation and requested that the timeframe be shorter than 2 business days.</li> </ul>	<p><b>Do not adjust.</b> Given the support at the Task Group level for 2 business days and 67% support from RWG/TWG straw poll respondents, CAQH CORE Staff and Co-chairs recommend moving forward with 2 business days as the timeframe for requesting additional information from the provider when a PA is initially pended for additional information in Real Time Processing Mode.</p> <ul style="list-style-type: none"> <li>• The response time requirements proposed in the Phase IV 278 Infrastructure Rule Update establish a <i>maximum</i> timeframe that health plans must return what information is needed to complete the PA. The update does not force health plans to respond within a 24 - 48 hour timeframe for PAs that can be adjudicated in a shorter timeframe.</li> <li>• Additionally, the Draft Phase IV Update aims to bring consistency to the industry so that both healthcare providers and health plans can have shared expectations and build more efficient and automated systems. Healthcare providers and health plans who may adopt the Phase IV 278 Infrastructure Rule, including this update, must continue to abide by state laws that are stricter than CAQH CORE timeframes.</li> <li>• While emerging technology is expediting the turnaround time for requested information, many health plans are not able to identify the necessary documentation for completion in real-time or near real-time.</li> </ul>

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3.	Section 4.4.4 Time Requirement for Final Determination (Real Time)	<p>Five entities requested a timeframe other than 2 business days for the final determination of a PA submitted in Real Time Processing Mode.</p> <ul style="list-style-type: none"> <li>• One entity explained that the timeframe was too short to perform manual reviews on PAs and compose a response to the provider but did not suggest a different timeframe.</li> <li>• Another recommended that the timeframe should be 3 or 4 days rather than 2 business days for non-urgent PAs.</li> <li>• Another commented that the response time should be dictated by the level of service, as specified in the UM06, and that elective routine services should not force as 24 – 48 hour response time.</li> <li>• One noted that it takes up to five business days for their organization to review a PA and make a final determination.</li> <li>• One explained that NCQA and other guidelines allow at least 15 days to make a final determination once all information is received.</li> </ul>	<p><b>Do not adjust.</b> Given the support at the Task Group level for 2 business days and 58% support from RWG/TWG straw poll respondents, CAQH CORE Staff and Co-chairs recommend moving forward with 2 business days as the timeframe for final determination of a PA submitted using Real-Time Processing Mode.</p> <p>As previously noted, CAQH CORE will remove the specific time references (7:00 AM and 9:00 PM) included in Sections 4.4.3, 4.4.4, 4.5.3 and 4.5.4 and adjust the maximum response timeframe to two-business days from time of receipt of the 278 Request to improve clarity around the two-business day timeframe.</p>
4.	4.5.3 Time Requirement for Requesting Additional Information (Batch)	<p>Two entities requested timeframes other than 2 business days for the health plan to communicate what information is needed from the provider to complete the PA Request, when the request is submitted in Batch Processing Mode.</p> <ul style="list-style-type: none"> <li>• One entity suggested that health plans immediately know what information is needed to complete a PA request and should respond be able to reply in one hour using Batch Processing.</li> <li>• One entity recommended 15 calendar days as the response time for a health plan to communicate their request for additional information and/or final response since it is equivalent to the number of days providers are given to respond back to the health plan with the additional documentation before a PA is closed out.</li> </ul>	<p><b>Do not adjust.</b> Given the support at the Task Group level for 2 business days and 74% support from RWG/TWG straw poll respondents, CAQH CORE Staff and Co-chairs recommend moving forward with 2 business days as the timeframe for the health plan to communicate what additional information/documentation is needed to complete the PA request using Batch Processing Mode.</p> <p>Additionally, while a real time or near real time response is the ideal, many health plans are not able to identify the necessary documentation for completion in real or near real time.</p>

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5.	4.5.3 Time Requirement for Requesting Additional Information (Batch)	<p>One entity suggested that the current requirement should be split into two scenarios 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 has a response time of 24 hours to review the information and respond to the provider 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 or its agent has a response time of one hour to communicate to the provider what additional information/documentation is necessary to complete the PA request.</li> </ul>	<p><b>Do not adjust.</b> Due to the support from the Task Group and 74% support from Work Group straw poll respondents to allow 2 business days for health plans to communicate the additional information necessary to complete the PA, CAQH CORE Staff and Co-chairs recommend including both scenarios (when solicited and unsolicited documentation is sent to a health plan with the PA request) as one requirement and keep timeframe as 2 business days rather than 24 hours when unsolicited information is received and one hour when unsolicited information is not received.</p> <p>Additionally, there would be limited ability to track and audit conformance with the requirement if the scenarios were split into 278 Requests received with unsolicited information/documentation and 278 Requests received without unsolicited information/documentation.</p> <p><b>Work Group Feedback Needed.</b> Similar to the Real-Time Response Requirements, consider splitting Section 4.5.3 into two separate batch response time requirements to address when information is known vs. when information is unknown at the time of the PA request:</p> <ul style="list-style-type: none"> <li>• Time Requirement for Requesting Additional Information/Documentation <i>When Known</i> at Time of Request (Batch Processing Mode).</li> <li>• Time Requirement for Requesting Additional Information/Documentation <i>When Unknown</i> at Time of Request (Batch Processing Mode).</li> </ul>
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6.	Multiple Sections (4.4.4 and 4.5.4 – Final Determination Requirements)	One entity recommended the addition of a requirement that would prohibit pending 278 Requests in specific scenarios, such as 278 Requests where a PA is not required by the health plan. They note that in these cases, the health plan should respond informing the provider that the PA is not necessary in real-time using Real Time Processing or within one hour for Batch Processing.	<b>Do not adjust.</b> The intent of the Phase IV 278 Update is to provide requirements for the conduct of the 278 Request and Response. Phase IV CORE Rules do not address data content. Since the addition of this requirement would require specifying the code a health plan or its agent must return to indicate that a PA isn't required, the proposed adjustments are out of scope for this update. This requirement is under consideration for the CAQH CORE PA Pilot and will also be considered in future CORE Rule development.
7.	Section 4.5.4 Time Requirement to Final Determination (Batch)	<p>Four entities requested timeframes other than 2 business days for the final determination of a PA in Batch Processing Mode.</p> <ul style="list-style-type: none"> <li>• One entity noted that nearly 70% of PAs can be auto-adjudicated. As such, they requested that the timeframe be shorter than 2 business days since most services should be responded to in real time. They added that clinically complicated services could be carved out of the rule.</li> <li>• Another asked that 48 hours be used as the time requirement rather than 2 business days because health care is a 24 hour business.</li> <li>• Another recommended that the timeframe should be either 3 or 4 days for non-urgent PAs.</li> <li>• One recommended 15 calendar days as the maximum response time for a health plan to make a final determination.</li> </ul>	<p><b>Do not adjust.</b> 63% of RWG/TWG straw poll respondents supported the requirement, as written. Therefore, CAQH CORE Staff and Co-chairs recommend moving forward with 2 business days as the timeframe for final determination of a PA submitted using Batch Processing Mode.</p> <p>As previously noted, CAQH CORE will remove the specific time references (7:00 AM and 9:00 PM) included in Sections 4.4.3, 4.4.4, 4.5.3 and 4.5.4 and adjust the maximum response timeframe to two business days from time of receipt of the 278 Request to improve clarity around the two business day timeframe.</p>
8.	4.6.1 Close Out Requirement	One entity suggested developing a requirement that health plans must send a notification to the provider indicating that the information necessary to complete the pended PA request and make a final determination has not been received prior to cancelling the PA request.	<b>Work Group Feedback Needed.</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, it does not prohibit the health plan from sending a reminder notification prior to the close out time period.

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9.	4.6.1 Close Out Requirement	Two entities suggested removing the requirement from the update noting that because providers are already motivated to respond to requests for additional documentation as quickly as possible, a requirement is not necessary.	<p><b>Do not adjust.</b> Given 71% support for the Close Out requirement by the RWG/TWG, CAQH CORE Staff and Co-chairs recommend including the requirement in the update to the draft rule.</p> <p>It should also be noted that the close out scenario applies when a health plan has failed to receive supporting data/documentation for a requested PA. The close out requirement allows health plans to electronically document that all PA inquiries have been fully accounted for within their systems – every 278 Inquiry has a matching 278 Response.</p>
10.	4.6.2 Close Out Requirement Timeframe	<p>Three entities recommended a timeframe other than 15 business days for the Close Out Requirement Timeframe.</p> <ul style="list-style-type: none"> <li>• Two entities suggested 30 business days as the timeframe to close out a PA request pending for additional information, noting that 15 days is often not enough time to generate the documentation necessary to complete the PA Request.</li> <li>• Another commented that certain DOL laws require 45 day reviews.</li> </ul>	<p><b>Do not adjust.</b> 65% of the RWG/TWG voted in support of the close out requirement, therefore CAQH CORE Staff and Co-chairs recommend moving forward with the 15 business day timeframe for the close out requirement.</p> <p>This is an optional requirement for the health plan as the draft rule language states the health plan “may choose to close out an ASC X12N v5010 278 Request.” The rule language does not require the health plan to close out the PA after 15 days.</p>



## 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>	13 (65%)	7 (35%)	9

**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>Two entities suggested revising the 3<sup>rd</sup> and 5<sup>th</sup> new bullets in Section 1.1. to clarify that the provider does not have to send a second 278 Request if all information is received on the initial submission.</li> <li>One of these entities commented that “incomplete request” should be added to the 6<sup>th</sup> new bullet.</li> <li>Another noted that components of the Certification Test Suite are missing including bullets corresponding to Section 4.5.2 and verbiage identifying the “unknown” additional information in the Real Time processing use case scenario.</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>

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## 6. Next Steps

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

- CAQH CORE Staff and Co-chairs will:
  - Implement adjustments to the *Draft Phase IV 278 Infrastructure Rule Update* based on PIV RWG/TWG discussion and comments.
  - Send RWG/TWG Straw Poll #2 on the *Draft Phase IV 278 Infrastructure Rule Update* and *Draft Certification Test Suite Update – 278 Infrastructure Test Scenario* by **Monday 09/16/19, end of day.**
- CAQH CORE PIV RWG/TWG Participants will:
  - Complete the 2<sup>nd</sup> RWG/TWG Straw Poll by **Friday 09/27/19, end of day.**
  - Participate in the 3<sup>rd</sup> RWG/TWG Call on **Wednesday 10/16/19 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* prior to the RWG/TWG Ballot.

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## 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>	21 (91%)	2 (9%)	6
<b>Part B: Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements</b>				
4.4.2	Section 4.4.2: <i>Time Requirement for Requesting Additional Information/Documentation when Known at Time of Request (Real Time Mode)</i>	18 (78%)	5 (22%)	6
4.4.3	Section 4.4.3: <i>Time Requirement for Requesting Additional Information/Documentation when Unknown at Time of Request (Real Time Mode)</i>	16 (67%)	8 (33%)	5
4.4.4	Section 4.4.4: <i>Time Requirement for Final Determination after an Initial Pended Response (Real Time Mode)</i>	14 (58%)	10 (42%)	5
4.5.3	Section 4.5.3: <i>Time Requirement for Requesting Additional Information/Documentation (Batch Mode)</i>	17 (74%)	6 (26%)	6
4.5.4	Section 4.5.4: <i>Time Requirement for Final Determination (Batch Mode)</i>	15 (63%)	9 (37%)	5
4.6.1	Section 4.6.1: <i>ASC X12N v5010 278 Response Close Out Due to a Lack of Requested Information/Documentation</i>	17 (71%)	7 (29%)	5
4.6.2	Section 4.6.2: <i>ASC X12N v5010 278 Response Close Out Due to a Lack of Requested Information/Documentation Time Requirement</i>	15 (65%)	8 (35%)	6
<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>	13 (65%)	7 (35%)	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>21 (91%)</b>	<b>2 (9%)</b>	<b>6</b>
	Provider	5 (83%)	1 (17%)	0
	Health Plan	8 (100%)	0 (0%)	2
	Vendor	5 (83%)	1 (17%)	1
	Government	2 (100%)	0 (0%)	1
	Other	1 (100%)	0 (0%)	2
<b>PART B: Draft Updates to Phase IV 278 Infrastructure Rule Response Time Requirements</b>				
<b>Sect 4.4.2</b>	<b>Time Requirement for Requesting Additional Info when Known (Real Time)</b>	<b>18 (78%)</b>	<b>5 (22%)</b>	<b>6</b>
	Provider	6 (100%)	0 (0%)	0
	Health Plan	7 (78%)	2 (22%)	1
	Vendor	3 (60%)	2 (40%)	2
	Government	1 (50%)	1 (50%)	1
	Other	1 (100%)	0 (0%)	2
<b>Sect 4.4.3</b>	<b>Time Requirement for Requesting Additional Info when Unknown (Real Time)</b>	<b>16 (67%)</b>	<b>8 (33%)</b>	<b>5</b>
	Provider	3 (50%)	3 (50%)	0
	Health Plan	6 (67%)	3 (33%)	1
	Vendor	5 (83%)	1 (17%)	1
	Government	1 (50%)	1 (50%)	1
	Other	1 (100%)	0 (0%)	2
<b>Sect 4.4.4</b>	<b>Time Requirement for Final Determination (Real Time)</b>	<b>14 (58%)</b>	<b>10 (42%)</b>	<b>5</b>
	Provider	3 (50%)	3 (50%)	0
	Health Plan	6 (67%)	3 (33%)	1
	Vendor	3 (50%)	3 (50%)	1
	Government	1 (50%)	1 (50%)	1
	Other	1 (100%)	0 (0%)	2
<b>Sect 4.5.3</b>	<b>Time Requirement for Requesting Additional Info (Batch)</b>	<b>17 (74%)</b>	<b>6 (26%)</b>	<b>6</b>

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Rule Section		Support	Do Not Support	Abstain #
	Provider	4 (67%)	2 (33%)	0
	Health Plan	5 (71%)	2 (29%)	3
	Vendor	5 (83%)	1 (17%)	1
	Government	2 (67%)	1 (33%)	0
	Other	1 (100%)	0 (0%)	2
<b>Sect 4.5.4</b>	<b>Time Requirement for Final Determination (Batch)</b>	<b>15 (63%)</b>	<b>9 (37%)</b>	<b>5</b>
	Provider	4 (67%)	2 (33%)	0
	Health Plan	5 (63%)	3 (37%)	2
	Vendor	3 (50%)	3 (50%)	1
	Government	2 (67%)	1 (33%)	0
	Other	1 (100%)	0 (0%)	2
<b>Sect 4.6.1</b>	<b>278 Response Close Out Due to Lack of Requested Info</b>	<b>17 (71%)</b>	<b>7 (29%)</b>	<b>5</b>
	Provider	2 (40%)	3 (60%)	1
	Health Plan	8 (89%)	1 (11%)	1
	Vendor	4 (67%)	2 (33%)	1
	Government	2 (67%)	1 (33%)	0
	Other	1 (100%)	0 (0%)	2
<b>Sect 4.6.2</b>	<b>278 Response Close Out Due to Lack of Requested Info Time Requirement</b>	<b>15 (65%)</b>	<b>8 (35%)</b>	<b>6</b>
	Provider	2 (40%)	3 (60%)	1
	Health Plan	6 (75%)	2 (25%)	2
	Vendor	4 (67%)	2 (33%)	1
	Government	2 (67%)	1 (33%)	0
	Other	1 (100%)	0 (0%)	2

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<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>13 (65%)</b>	<b>7 (35%)</b>	<b>9</b>
	Provider	3 (75%)	1 (25%)	2
	Health Plan	6 (77%)	2 (25%)	2
	Vendor	2(40%)	3 (60%)	2
	Government	1 (50%)	1 (50%)	1
	Other	1 (100%)	0 (0%)	2

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

**Table 1. Non-Substantive Comments Received on Part B: Draft Phase IV 278 Response Time Requirements**

**Note:** There were not any non-substantive comments received on Part A: Draft Updates to Scope.

<b>#</b>	<b>Section/Question</b>	<b>Summary of Comments (Paraphrased, not verbatim)</b>	<b>CAQH CORE Response</b>
<b>Non-Substantive Comments</b>			
<b>1.</b>	Multiple Sections (4.4.2; 4.4.3; 4.4.4; 4.5.3; 4.5.4; 4.6.1)	One entity voiced their support for the Phase IV Update noting that it will improve the provider’s ability to care for their patients.	N/A
<b>2.</b>	4.4.2 Time Requirement for Requesting Additional Info when Known (Real Time)	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.
<b>3.</b>	4.4.2 Time Requirement for Requesting Additional Info when Known (Real Time)	One entity explained that they have eliminated all but manual review PAs and therefore the only real-time response they would be able to send would be a pend without the notice of additional information that is required to complete the request.	N/A
<b>4.</b>	Multiple Sections (4.4.2; 4.4.3)	One entity commented that a minimum of 40 seconds is needed to return a real-time PA Response communicating	The existing Phase IV 278 Infrastructure Rule states that a health plan or its agent must return an

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#	Section/Question	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
		what additional information/documentation is needed to complete the PA Request.	initial response within 20 seconds, when using Real Time Processing Mode.  In Section 4.4.3, the timeframe, as currently written, allows 2 business days to return the information. This exceeds the minimum 40 seconds requested.
4.	Multiple Sections (4.5.3; 4.5.4) Batch Requirements	One entity expressed their support for the Batch Response timeframes because they mirror the 271 Batch Response.	N/A
5.	Multiple Sections (4.5.4; 4.5.4) Final Determination Requirements	One entity stated that a 2 business day timeframe is consistent with their organization's standards.	N/A
6.	4.6.2 Close Out Time Requirement	One entity expressed their support for the Close Out Requirement noting that closing out a PA within 15 business days is beneficial to their organization.	N/A

**Table 2. 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	Four entities suggested waiting to update the Phase IV Certification Test Suite – 278 Infrastructure Test Scenario until the non-supported sections of the rule are addressed.	N/A
2.	1.1 Cert Test Suite – 278 Infrastructure Test Scenario	One entity expressed their support for the updates to the Certification Test Suite.	N/A

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**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> <li>• Discuss next steps including the RWG/TWG Straw Poll 2.</li> </ul>
<b>Monday 09/16/19 - Tuesday 09/27/19</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> </ul> <p>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>.</p>
<b>Wednesday 10/16/19</b> <b>2:30 – 4:00pm ET</b>	<b>RWG/TWG Call #3</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> <li>• Discuss next steps including the RWG/TWG Ballot.</li> </ul>



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<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 2:30 – 4:00pm ET</b></p>	<p><b>TENTATIVE: RWG/TWG Call #4</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>