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1. Rules/Technical Work Group 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. The Ballot was sent to the RWG/TWG on 10/21/19 and closed 11/01/19. Results were sent to the RWG/TWG via email on 11/05/19. This document contains the results of the Ballot, as well as a summary of the comments submitted by responding organizations.

2. Rules/Technical Work Group Ballot Results

Per the CAQH CORE Voting Process, the following must occur at the Work Group level for approval of a Draft CAQH CORE Operating Rule and Certification Test Suite.

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

2.1 Table 1: Summary of Respondents, by Stakeholder Breakdown

The Ballot received feedback from 70% of RWG/TWG participating organizations, comprising 32 unique organizations, meeting the required quorum.

Number of PIV RWG/TWG Participating Entities	46
Total Number of Individual Responses	32 (70% of PIV RWG/TWG Entities)
Number of Provider / Provider Association Responses	7 (22% of respondents)
Number of Health Plan / Health Plan Association Responses	12 (37% of respondents)
Number of Vendor / Clearinghouse Responses	6 (19% of respondents)
Number of Government / Other Responses	7 (22% of respondents)

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2.2 Table 2: Summary of Responses on the RWG/TWG Ballot

Both the *Draft Phase IV CAQH CORE 278 Infrastructure Rule Update* and *Draft Phase IV CAQH CORE Certification Test Suite Update – 278 Infrastructure Test Scenario* were approved, as both received greater than the 50% necessary support.

	Draft Phase IV CAQH CORE 278 Infrastructure Rule Update	Draft Phase IV CAQH CORE Certification Test Suite Update – 278 Infrastructure Test Scenario
Number of “Support” Responses	21 (70%)	18 (75%)
Number of “Do Not Support” Responses	9 (30%)	6 (25%)
Number of “Abstain” Responses	2	8
Total Number of Responses	32	32

NOTE: Abstentions are not included in the percentage calculations for Support/Do Not Support

2.3 Table 3: Summary of Responses on the Draft Phase IV CAQH CORE 278 Infrastructure Rule Update, by Stakeholder Type

	Provider/Provider Association	Health Plan/Health Plan Association	Vendor/Clearinghouse	Government/Other
Number of “Support” Responses	4 (57%)	8 (73%)	3 (60%)	6 (86%)
Number of “Do Not Support” Responses	3 (43%)	3 (27%)	2 (40%)	1 (14%)
Number of “Abstain” Responses	0	1	1	0
Total Number of Responses	7	12	6	7

NOTE: Abstentions are not included in the percentage calculations for Support/Do Not Support

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2.4 Table 4: Summary of Responses on the Draft Phase IV CAQH CORE Certification Test Suite Update – 278 Infrastructure Test Scenario, by Stakeholder Type

	Provider/Provider Association	Health Plan/Health Plan Association	Vendor/Clearinghouse	Government/Other
Number of “Support” Responses	4 (80%)	5 (63%)	4 (80%)	5 (83%)
Number of “Do Not Support” Responses	1 (20%)	3 (37%)	1 (20%)	1 (17%)
Number of “Abstain” Responses	2	4	1	1
Total Number of Responses	7	12	6	7

NOTE: Abstentions are not included in the percentage calculations for Support/Do Not Support

3. Summary of Comments Received from RWG/TWG Ballot on Draft Phase IV CAQH CORE 278 Infrastructure Rule and Certification Test Suite Update

The following tables contain all ballot comments received on the Draft Phase IV CAQH CORE 278 Infrastructure Rule Update and Draft Phase IV CAQH CORE Certification Test Suite Update – 278 Infrastructure Test Scenario presented by Section or Subsection. **Table 5** contains Substantive Comments received, **Table 6** contains Points of Clarification Comments received and **Table 7** contains Non-Substantive Comments received.

Classification of Comments

- **Substantive Comments** – From organizations that are still not in support of specific rule requirements that are requesting major substantive adjustments. **NOTE:** No action will be taken to adjust, given the approval ratings, but entities that implement the update will be able to cast their vote at the Final CAQH CORE Vote level.
- **Points of Clarification** – Pertain to areas where more education is required given the scope of the update has been established and approved by the RWG/TWG vote. **NOTE:** No action will be taken to adjust, given the approval ratings, but entities that implement the update will be able to cast their vote at the Final CAQH CORE Vote level. FAQs for the update will be written and available on the CAQH CORE website to assist with implementation. Additionally, CAQH CORE Participants may contact CAQH CORE staff with immediate questions.
- **Non-substantive Comments** – Pertain to typographical/grammatical errors, wordsmithing, clarifying language, addition of references; do not impact rule requirements.

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3.1 Table 5: Substantive Comments Received on the RWG/TWG Ballot

NOTE: No substantive comments were received pertaining to the Draft Phase IV Certification Test Suite Update.

#	Section/Section Title	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
Draft Phase IV CAQH CORE 278 Infrastructure Rule Update			
1.	Section 3.4: Out of Scope of this Rule	Two entities commented that retrospective and urgent requests for authorizations should be included in the scope of the rule. One of these entities also recommended documenting the need for future rule-making pertaining to these two areas within the rule.	<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, rather than only updating Phase IV.</p>
2.	Section 4.4.3: Time Requirement for Additional Information/Documentation (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. They suggested that if the information is 'known' to the health plan, then the response time should be overnight, aligning with the eligibility response timeframe.</p> <p>They further suggested adding a footnote, similar to footnote 18, that urges plans to respond faster than two business days when the health plan has a published policy that references the required documentation.</p>	<p>As discussed on previous RWG/TWG calls, eligibility typically only requires the use of one or two systems to process the transaction, while prior authorization requests can require up to five different systems to process the same request. Therefore, mirroring the eligibility response time requirement is not feasible for a batch 278 transaction.</p> <p>Additionally, there would be limited ability for health plans and providers to track and audit conformance with this requirement if the scenarios were split into known and unknown scenarios in Batch Processing Mode.</p>

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<p>3. Sections 4.4.4 and 4.5.4: Time Requirement for a Final Determination (Batch & Real Time)</p>	<p>Five entities commented that they could not support a two day turnaround time for final determination.</p> <ul style="list-style-type: none"> • One entity suggested three or four days as the response timeframe. • Two entities noted that the requirement does not align with NCQA and other guidelines which allow at least 15 days to make a final determination once all information is received. • One of these entities further explained that by placing a shorter time-frame on non-urgent, elective requests organizations may be compelled to prioritize response time requirements rather than to the true urgency of the patient. • Two entities indicated that two days is not enough time for manual reviews of prior authorizations but did not recommend an alternative timeframe. 	<p>The intent of the Phase IV 278 Update is to bring consistency to the industry through shared expectations, more efficient and automated systems and reduce the burden of manual processes to improve timely care to patients through a decreased turnaround time for the PA process than what currently exists in the industry.</p> <p>Additionally, urgent situations have their own process and are out of scope for this update so cases where a patient needs urgent care would not be applicable under these requirements.</p>
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3.2 Table 6: Point of Clarification Comments Received on the RWG/TWG Ballot

NOTE: No point of clarification comments were received pertaining to the Draft Phase IV Certification Test Suite Update.

#	Section/Section Title	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
Draft Phase IV CAQH CORE 278 Infrastructure Rule Update			
1.	All Sections	One entity commented that they could not support the rule because it allows for a web based tool.	The Phase IV 278 Infrastructure Rule Update establishes maximum response timeframes for the 278 Request/Response transaction. Neither the existing rule nor the update pertain to web based tools, such as web portals.
2.	Section 4.5.1: Time Requirement for 278 Initial Response (Real Time)	One entity noted that a real time response of 20 seconds is not a reasonable amount of time to reply with a pend.	The existing Phase IV 278 Infrastructure Rule requires a health plan to pend a real time 278 Request within 20 seconds. Furthermore, according to the Draft Phase IV 278 Infrastructure Rule Update, if a health plan or its agent does not immediately know what additional information is needed from the provider to complete the prior authorization request, the update to the Phase IV 278 Infrastructure Rule allows two business days for the health plan to respond to the provider with the information for requests submitted using real time processing mode.
3.	Section 4.6.1: Close Out Time Requirement	One entity expressed concern that although their organization supports the ability to return an unsolicited response indicating that the PA Request has been closed out, in some cases 45 days is required and requiring a close out in 15 days could result in additional administrative work to create new requests.	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 in 15 days 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.

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3.3 Table 7: Non-Substantive Comments Received on the RWG/TWG Ballot

#	Section/Section Title	Summary of Comments (Paraphrased, not verbatim)	CAQH CORE Response
Draft Phase IV CAQH CORE 278 Infrastructure Rule Update			
1.	All Sections	One entity commented that their organization does not conduct the 278 transaction.	N/A
2.	All Sections	One entity stated that they are fully able to support the requirements covered in the ballot, but that they should ultimately be approved by the provider and payer stakeholder types.	N/A
3.	Section 2: Issue to be Addressed and Business Requirement Justification	One entity requested that language indicating that health plans should respond to prior authorization requests as soon as possible must be drafted before they can support the rule.	N/A
4.	Section 4.4.4: Time Requirement for Final Determination (Batch)	One entity noted that there are not well understood practices for delivering an unsolicited 278 response.	N/A
Draft Phase IV CAQH CORE Certification Test Suite Update - 278 Infrastructure Test Scenario			
1.	1.1 Draft Phase IV Certification Test Suite	Two entities commented the Certification Test Suite does not apply to their organizations.	N/A
2.	1.1 Draft Phase IV Certification Test Suite	Four entities explained that their organization would not support the Certification Test Suite until their suggested changes to the rule requirements were implemented.	N/A
3.	1.1 Draft Phase IV Certification Test Suite	One entity stated that they are fully able to support the requirements covered in the Ballot, but that they should ultimately be approved by the provider and payer stakeholder types.	N/A