

CAQH CORE Attachments Subgroup (Prior Authorization Use Case) Straw Poll #2 – Draft CAQH CORE Attachments (275/278) Rule Set

Straw Poll Purpose

The purpose of this straw poll is to collect feedback from the CAQH CORE Attachments Subgroup - Prior Authorization Use Case (ASG-PA) on its level of support for each section of the Draft CAQH CORE Attachments (275/278) Infrastructure Rule and Draft CAQH CORE Attachments (275/278) Data Content Rule. The results of this straw poll will be discussed on the ASG-PA's next call on Thursday, 03/04/21.

Background

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

Following the conclusion of the ASG-PA, a new attachments subgroup will convene, and shift focus to the **electronic exchange of attachments for claims**. After the claims subgroup concludes, a Review Work Group will convene to update and refine the prior authorization and claims attachment rules concurrently, given aspects of the attachments prior authorization requirements may be impacted by the claims use case requirements' definitions. The finalized draft rule sets will provide consistency and parity across the claims and prior authorization attachments use cases.

On its 07/23/20 call, members of the ASG-PA reviewed and discussed seven potential opportunity areas in preparation to complete the first ASG-PA Feedback Form:

- Opportunity Area #1: System Availability
- Opportunity Area #2: Payload Acknowledgement and Response Time
- Opportunity Area #3: Data Error Handling
- Opportunity Area #4: File Size
- Opportunity Area #5: Reassociation
- Opportunity Area #6: Access to/Identification or Required Information
- Opportunity Area #7: Companion Guide

The first feedback form evaluated each opportunity area and potential rule options to pursue.

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

On its 11/05/20 call, the ASG-PA reviewed the potential Draft Infrastructure and Data Content requirements, in preparation to complete the first ASG-PA straw poll.

On its 12/17/20 call, the ASG-PA reviewed the results of the first straw poll and discussed substantive and point of clarification comments submitted by subgroup participants. Given the high support for the Draft Infrastructure and Data Content requirements presented on the straw poll, the subgroup decided to move forward with drafting Attachments Infrastructure Rule and Attachments Data Content Rule scope and requirement sections. **NOTE**: The subgroup decided not to pursue opportunity area #6: Access to Identification or Required Information and to coordinate among the industry to provide continued education on this topic.

On its 02/04/21 call, the ASG-PA reviewed the draft Attachments Infrastructure and Data Content Rule requirements in preparation for this straw poll.

Straw Poll Format

Items to review, listed in the order that they appear in the straw poll, include the following:

- PART A: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Infrastructure Rule
 Scope Sections
 - Section 3: Scope
- PART B: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Infrastructure Rule
 Requirement Sections Related to X12 275 Method
 - Section 4.1 Processing Mode Requirements for X12 275 Attachments
 - Section 4.2 Connectivity Requirements for X12 275 Attachments
 - Section 4.3 System Availability and Reporting Requirements for X12 275 Attachments
 - Section 4.4 Payload Acknowledgements and Response Time Requirements for X12 275 Attachments
 - Section 4.5 File Size Requirements for X12 275 Attachments
 - Subsection 4.5.1 Front End Server Requirements for Attachment using the X12 275 Transaction
 - Subsection 4.5.2 Internal Document Management Systems File Size Requirements Pertaining to Attachments using the X12 275 Transaction
 - Section 4.6 Companion Guide for X12 275 Attachments
- PART C: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Infrastructure Rule
 Requirement Sections Related to the Non-X12 Method
 - Section 5.1 Connectivity Requirements for Additional Documentation using CORE Connectivity
 - Section 5.2 System Availability and Reporting Requirements for Additional Documentation using the Non-X12 Method
 - Section 5.3 Payload Acknowledgements and Response Time Requirements for Additional Documentation using the Non-X12 Method
 - Subsection 5.3.1 Payload Acknowledgement Requirements Use of X12 278 Response
 - Section 5.4 File Size Requirements for Additional Documentation using the Non-X12 Method
 - Subsection 5.4.1 Front End Server Requirements for Additional Documentation using the Non-X12 Method
 - Subsection 5.4.2 Internal Document Management Systems File Size Requirements Pertaining to Additional Documentation using the Non-X12 Method
- PART D: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Data Content Rule
 Scope Sections
 - Section 3: Scope
- PART E: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Data Content Rule
 Requirement Sections Related to X12 275 Method
 - Section 4.1 Data Error Handling Requirements for Attachments using the X12 275 Transaction
 - Section 4.2 Reassociation Requirements
 - Subsection 4.2.1 Reassociation of an Unsolicited X12 275 to an X12 278 Request
 - Subsection 4.2.1.1 Common Reference Data Used to Reassociate a X12 275 and an X12 278 Request
 - Subsection 4.2.2 Reassociation of Solicited X12 275 to an X12 278 Request
- PART F: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Data Content Rule
 Requirement Sections Related to the Non-X12 Method
 - Section 5.1 Data Error Handling Requirements for Additional Documentation using the Non-X12 Method
 - Section 5.2 Reassociation Requirements
 - Section 5.2.1 Use of CORE Connectivity vC4.0.0 Headers to Reassociate Additional Documentation using the Non-X12 Method
 - Section 5.2.1.1 CORE-required Minimum Attachment Data Elements of Unsolicited Additional Document using the Non-X12 Method

Instructions

Part A of the straw poll asks respondents to read *Section 3 Scope* of the Draft CAQH CORE Attachments (275/278) Infrastructure Rule, including all sub-sections (e.g., Section 3.1; Section 3.2; etc.) and indicate their "Support" or "Non-support" for the draft language.

Part B of the straw poll ask respondents to read each requirement related to **Attachments using the X12 275 transaction** in the Draft CAQH CORE Attachments (275/278) Infrastructure Rule and indicate their "Support" or "Non-support" for the draft language.

Part C of the straw poll ask respondents to read each requirement related to **additional documentation using the Non-X12 Method** in the Draft CAQH CORE Attachments (275/278) Infrastructure Rule and indicate their "Support" or "Non-support" for the draft language.

Part D of the straw poll asks respondents to read *Section 3 Scope* of the Draft CAQH CORE Attachments (275/278) Data Content Rule, including all sub-sections (e.g., Section 3.1; Section 3.2; etc.) and indicate their "Support" or "Non-support" for the draft language.

Part E of the straw poll ask respondents to read each requirement related to **Attachments using the X12 275 transaction** in the Draft CAQH CORE Attachments (275/278) Data Content Rule and indicate their "Support" or "Non-support" for the draft language.

Part F of the straw poll ask respondents to read each requirement related to **additional documentation using the Non-X12 Method** in the Draft CAQH CORE Attachments (275/278) Data Content Rule and indicate their "Support" or "Non-support" for the draft language.

In all parts of the straw poll, respondents may provide comments relating to their responses, if applicable. Respondents may support the draft rule language, and still provide comments, feedback and/or suggested revisions. As always, respondents may also choose to abstain from responding to a question.

Additional Guidance

- Submit your response via the online link (not via the fillable PDF) by Friday, 02/19/21, end of day.
- Participants should reference the Draft CAQH CORE Attachments (275/278) Rule Set and the ASG-PA
 Call #5 Slide Deck 02.04.21 (included in the email sent to the ASG-PA on Monday, 02/08/21) while
 completing the straw poll.
- The language included in the Draft CAQH CORE Attachments (275/278) Infrastructure and Data Content Rules is a draft. Subgroup feedback and input will be necessary to refine and perfect the language. Each organization's response to this straw poll is critical to understanding the impact and effectiveness of these requirements in the industry.
- This straw poll is to be completed by ASG-PA Participating Organizations only. Please coordinate within your organization to submit one response per organization. Respondents may consult with other subject matter experts within their organization, as needed. To support coordination prior to submitting the final response via the online link, a copy of the online form in a fillable PDF was provided to you via email.
- Questions should be directed to Marianna Singh, CORE Associate, at msingh@caqh.org.

NOTE: In accordance with CAQH CORE policy, all responses will be kept strictly confidential.

CAQH CORE Attachments Subgroup (Prior Authorization Use Case) - Participant Information

Please coordinate within your organization to submit only <u>one</u> response for your organization. Multiple responses from the same organization will not be tabulated.

First Name	
Last Name	
Position Title	
Name of CAQH CORE Participating Organization	
Email Address	
Phone Number	

Respondent Stakeholder Type

Please identify as one of the following stakeholder types:

	Provider/ Provider Association	Health Plan/ Health Plan Association	Vendor or Clearinghouse	Government	Other (includes Standards Organizations)
Select Stakeholder Type	0	0	0	0	0

PART A: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Infrastructure Rule – Scope Sections

This Part of the straw poll asks respondents to review *Section 3 Scope* of the Draft CAQH CORE Attachment (275/278) Infrastructure Rule, including all sub-sections (e.g., *Section 3.1 What the Rule Applies to; Section 3.2 Standards Used in this Rule, etc.*), and provide your organization's support/non-support for the draft section.

this Rule, etc.), and provide your organization's	support/non-support for the draft section.
Section 3 Scope	

1. Does your organization support **Section 3 Scope** of the Draft CAQH CORE Attachment (275/278) Infrastructure Rule, as written?

NOTE: Given this section mirrors requirements included in prior CAQH CORE Infrastructure Rules, including the CAQH CORE Prior Authorization Infrastructure Rule, individual sub-sections will not be separately straw polled, but respondents may comment on any sub-section included in *Section 3 (e.g., Section 3.1 What the Rule Applies to, etc.)*.

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PART B: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Infrastructure Rule – Requirement Sections Related to X12 275 Method

X12 Method: Defined as the use of CORE Connectivity as the payload exchange method + X12 v6020X316 275 attachment payload format

This Part of the straw poll asks respondents to review *Section 4 Rule Requirements* of the Draft CAQH CORE Attachments (275/278) Infrastructure Rule, and provide your organization's support/non-support for the draft section.

Section 4.1 Processing Mode Requirements for X12 275 Attachments

applicable, please provide comments as to why you support or do not support this section of the section of the draft rule and still provide comments, suggested revisions, etc. Please refer to the spale for any comments provided. Section 4.2 Connectivity Requirements for X12 275 Attachments 3. Does your organization support Section 4.2 Connectivity Requirements of the Draft CA Attachments (275/278) Infrastructure Rule, which requires the use of Connectivity Rule NOTE: This draft requirement is identical for the X12 and non-X12 method.	
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Section 4.3 System Availability and Reporting Requirements X12 275 Attachments

4. Does your organization support **Section 4.3 System Availability and Reporting Requirements** of the Draft CAQH CORE Attachments (275/278) Infrastructure Rule, as written?

NOTE: Given this section mirrors requirements included in prior CAQH CORE Infrastructure Rules, including the CAQH CORE Prior Authorization Infrastructure Rule, individual sub-sections will not be separately straw polled, but respondents may comment on any sub-section included in *Section 4.3*. Additionally, this draft requirement is identical for the X12 and non-X12 method.

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If applicable, please provide comments as to w a section of the draft rule and still provide comments provided.		
Section 4.4 Payload Acknowledgmen	nts for X12 275 Attachment	s
 Does your organization support Sectio the Draft CAQH CORE Attachments (2 		
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Section 4.5 File Size Requirements for X12 275 Attachments

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R		ubsection 4.5.2 Internal Document Machments using an X12 275 Transactions Rule, as written?	
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ection 8. D N ir	of the draft rule and still provide of y comments provided. 1 4.6 Companion Guide for CAQH CORE Attachments (275/2) 1 OTE: Given this section mirrors including the CAQH CORE Prior A	to why you support or do not support the comments, suggested revisions, etc. Please X12 275 Attachments ection 4.6 Companion Guide for X12	ais section of the rule. You may suase refer to the specific line numbers 275 Attachments of the Draft ORE Infrastructure Rules, ual sub-sections will not be
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PART C: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Infrastructure Rule – Requirement Sections Related to the Non-X12 Method

Non-X12 Method: Defined as the use of CORE Connectivity as the payload exchange method without an X12 payload format. Using this method, the additional information or documentation is contained within the specific payload type.

This Part of the straw poll asks respondents to review *Section 5 Rule Requirements* of the Draft CAQH CORE Attachments (275/278) Infrastructure Rule, and provide your organization's support/non-support for the draft section.

Section 5.1 Connectivity Requirements for	Additional Documen	tation using CORE
Connectivity		

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Section 5.3 Payload Acknowledgments for Additional Documentation using the Non-X12 Method

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12. Does your organization suppo	nents for Additional Documentation rt Subsection 5.4.1 Front End Server File sing the Non-X12 Method of the Draft CAC	Size Requirements for
Infrastructure Rule, as written?		
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PART D: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Data Content Rule – Scope Sections

This Part of the straw poll asks respondents to review *Section 3 Scope* of the Draft CAQH CORE Attachment (275/278) Data Content Rule, including all sub-sections (e.g., *Section 3.1 What the Rule Applies to; Section 3.2 Standards Used in this Rule, etc.*), and provide your organization's support/non-support for the draft section.

Section 3 Scope			
14. Does your organization support Sec Content Rule, as written?	ction 3 Scope of the Draft CAQH COF	E Attachment (275/278) Data	a
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PART E: Question(s) Pertaining Rule – Require X12 Method: Defined as the use of CORE (attachment payload format.	ement Sections Related to <u>X12</u>	2 275 Method	
This Part of the straw poll asks respondents Attachments (275/278) Data Content Rule, a			ection.
Section 4.1 Data Error Handling Re	equirements for Attachments	using the X12 275 Trar	nsaction
15. Does your organization support Sec Attachments (275/578) Data Conter	ction 4.1 Data Error Handling Requiret Rule, which requires use of X12 v60		ORE
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If applicable, please provide comments as to a section of the draft rule and still provide corule for any comments provided.			

Section 4.2 Reassociation Requirements using the X12 275 Transaction

16. Does your organization support Section 4.2.1 Reassociation of an Unsolicited X12 275 to an X12 278

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PART F: Question(s) Pertaining to Draft CAQH CORE Attachments (275/278) Data Content Rule – Requirement Sections Related to the Non-X12 Method

Non-X12 Method: Defined as the use of CORE Connectivity as the payload exchange method without an X12 payload format. In this scenario, the additional information or documentation is contained within the specific payload type.

This Part of the straw poll asks respondents to review *Section 5 Rule Requirements* of the Draft CAQH CORE Attachments (275/278) Data Content Rule, and provide your organization's support/non-support for the draft section.

Section 5.1 Data Error Handling Requirements for Additional Documentation using the Non-

X12 Method			
19. Does your organization support Sec Attachments (275/578) Data Conter v5010X217 278 Response?	ction 5.1 Data Error Handling Requint to Rule, which requires use of applica		
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ction of the draft rule and still provide o	to why you support or do not support th comments, suggested revisions, etc. Plea	

21. Does your organization support Section 5.2.1.1 CORE-required Minimum Attachment Data Elements of

Thank you for completing ASG-PA Straw Poll #2. We will review the results of the straw poll on our next call, **Thursday, March 04, 2021 from 3:00 – 4:30pm ET**.

As a reminder, please click "next" to formally submit your feedback.