

**CAQH Committee on Operating Rules for Information Exchange (CORE)
Attachments Subgroup (Prior Authorization Use Case) (ASG-PA)
Call #3 Summary: Thursday, December 17, 2020, 2:30-4:00 pm ET Conference Call**

This document contains:

- Agenda items and key discussion points.
- Decisions and actions to be taken.
- Next steps.
- Call attendance.

<i>Agenda Item</i>	<i>Key Discussion Points</i>	<i>Decisions and Actions</i>
1. Antitrust Guidelines	<ul style="list-style-type: none"> • Bob Gross (Cleveland Clinic) opened the call and reviewed the Antitrust Guidelines, noting that they are published on the CAQH CORE Calendar along with the meeting materials. • Bob Gross (Cleveland Clinic) introduced CAQH CORE staff supporting the subgroup and other co-chairs: Mahesh Siddanati (Centene) and Santo Carino (Epic). 	<i>Discussion</i>
2. Roll Call and Administrative Items	<ul style="list-style-type: none"> • Bob Gross (Cleveland Clinic) reviewed the call documents: <ul style="list-style-type: none"> ○ Doc #1: ASG-PA Call 4 Agenda 12.17.20 ○ Doc #2: ASG-PA Call 3 Summary 11.05.20 ○ Doc #3: ASG-PA Straw Poll 1 Results 12.17.20 • Bob Gross (Cleveland Clinic) reviewed the focus of the call, which was to: <ul style="list-style-type: none"> ○ Review results of ASG-PA Straw Poll #1. ○ Discuss Next Steps. • Marianna Singh (CAQH CORE Associate) facilitated roll call. [See call participant roster at the end of this meeting summary to view call attendees and affiliated organizations]. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ No questions or comments were raised by the ASG-PA participants. 	<i>Discussion</i>
3. Summary of 11/05/20 ASG-PA Call #2 (Doc #2)	<p>Summary of 11/05/20 ASG-PA Call #2 (Doc #2).</p> <ul style="list-style-type: none"> • Reviewed ASG-PA Timeline. • Reviewed CAQH CORE Attachments Opportunity Areas and Draft Rule Options. • Reviewed Draft CAQH CORE Attachments Infrastructure and Data Content Requirements. • Discussed Next Steps. • Marianna Singh (CAQH CORE Associate) asked the group for motion to approve call summary. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ No questions or comments were raised by the ASG-PA participants. 	<p><u>Action required:</u></p> <ul style="list-style-type: none"> • Approve 11/05/20 Call Summary (Doc #2) <ul style="list-style-type: none"> ○ Motion to approve by Molly Malavey (AMA) ○ Seconded by Rob Tennant (MGMA)

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4. CMS Prior Authorization API NPRM Update (Doc #1)	<ul style="list-style-type: none"> • Bob Bowman (CAQH CORE Director) provided a brief update on the CMS PA NPRM that was released the week prior and notified the subgroup that CAQH CORE would be submitting a brief comment letter. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ Mike Dennison (Change Healthcare) stated the rule was published in a special document and will not be published in the federal register until the following day. He further explained January 4th is the date that it's supposed to be published. ○ Rob Tennant (MGMA) added that due to number of initiatives, his organization is asking CMS for additional time to add comments. He further explained that because of the complexity of the rule and that the information imbedded within it needs to be reviewed; his organization is hoping the comment date is pushed back. He then asked which health plans are covered under the legislation because Medicare Advantage was excluded. <ul style="list-style-type: none"> - Bob Bowman (CAQH CORE Director) responded that he had conversations with the CAQH CORE board and various types of health plans, whom all agreed the proposed rule only pertained to certain plans, which would lead to industry fragmentation. There are concerns this is a significant piece of legislation that will have significant impact to health plans as well as vendors. ○ Molly Malavey (AMA) stated CMS is looking for comments from vendors as they know it will be a challenge getting vendor adoption and promotion in provider offices. She also stated she heard a rumor of attachment rules coming up and asked the subgroup for their thoughts. <ul style="list-style-type: none"> - Bob Bowman (CAQH CORE Director) responded he also hears the rules of attachments coming out in first quarter or possibly in January. He mentioned CAQH CORE is waiting like everyone else, and it will be to the industry's benefit to have guidance from CMS or HHS. He added CAQH CORE is working to try to build something industry can quickly adopt and that will help drive adoption. With claim status and remittance advice, Operating Rules have been adopted more broadly. He explained CAQH CORE is trying to drive consistency and messaging where there might be better approaches to attachments. ○ Sherry Wilson (Jopari) explained it is critical CAQH CORE Operating Rules and any regulations go hand in hand. She explained having attachments regulations is very important. <ul style="list-style-type: none"> - Bob Bowman (CAQH CORE Director) responded that CAQH CORE will continue to complete assessment and review of any regulations. 	<i>Discussion</i>
5. ASG-PA Straw Poll #1 Overview (Doc #3)	<ul style="list-style-type: none"> • Bob Gross (Cleveland Clinic) reviewed the CAQH CORE ASG-PA Straw Poll #1 format and background. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ No questions or comments were raised by the ASG-PA participants. • Mahesh Siddanati (Centene) reviewed the percent support received on each draft requirement. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ No questions or comments were raised by the ASG-PA participants. 	<i>Discussion</i>

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<p>6. Review ASG-PA Straw Poll #1 Results (Doc #3)</p>	<ul style="list-style-type: none"> • Santo Carino (Epic) reviewed general comments related to versioning of draft requirements. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ No questions or comments were raised by the ASG-PA participants. • Santo Carino (Epic) reviewed point of clarification comments related to the draft system availability requirements. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ No questions or comments were raised by the ASG-PA participants. • Emily TenEyck (CAQH CORE Manager) reviewed point of clarification comments related to the draft payload acknowledgment requirements. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ No questions or comments were raised by the ASG-PA participants. • Emily TenEyck (CAQH CORE Manager) reviewed point of clarification comments related to the draft file size requirements. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ Deb McCachern (Change Healthcare) responded that she was concerned with internal document management system requirements. She explained this area should be internal and up to each business entity and explained that would be an overstep of the Operating Rules scope. <ul style="list-style-type: none"> - Emily TenEyck (CAQH CORE Manager) thanked her for clarifying that point and mentioned CAQH CORE would consider that moving forward. - Bob Bowman (CAQH CORE Director) stated he would like to remind the subgroup this particular requirement received high support. He added that CAQH CORE requirements in the past had system-based requirements or requirements with auditing or reporting, so there is precedence in other rules that we have that touched on internal document systems. • Marianna Singh (CAQH CORE Associate) reviewed substantive comments related to draft system availability requirements. • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ Molly Malavey (AMA) stated that when looking at system availability and file size, she appreciated it being consistent across exchanges but wished the system availability would be higher. She also asked for clarification on standards that have EDI and are being applied to non-X12 standards. She stated she does not believe there is justification for looking at requirements for non-X12. <ul style="list-style-type: none"> - Bob Bowman (CAQH CORE Director) responded that CAQH CORE is trying to assess industry feedback and comments from ASG-PA feedback forms. As we move from web service type approaches like REST or FHIR, which have advanced data exchange and EDI, CAQH CORE wants to continue to consider the potential of making edits and updates. He explained he understands that consistency across the entire gambit of transactions is important. CAQH 	<p><i>Discussion</i></p>
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CORE explained they want to have everything level set across transactions to ensure the auditing and reporting components for requirements are met at as well. He added that as changes to requirements are made, reporting requirements change as well. For example, if we go from 86% system availability, all the auditing and reporting requirements must change. He stated that it's a significant lift and he understands systems today do not fall below 96% system availability. Many vendors and health plans have no problem meeting 86% for 20 seconds and CAQH CORE does not want to disenfranchise organizations from meeting the baseline.

- Bob Bowman (CAQH CORE Director) reviewed substantive comments related to draft Policy Access requirements.
- **Summary of ASG-PA Discussion:**
 - Mahesh Siddanati (Centene) added this area has a lot of overlap with the new proposed regulation from CMS, so CAQH CORE proposing to table this section makes a lot of sense.
 - Bob Bowman (CAQH CORE Director) responded to Mahesh that he is right on the money. He explained that with the potential NPRM that does have particular requirements for health plans or bodies to respond in this type of way, CAQH CORE wants to understand those and bring it back to subgroup.
- Bob Bowman (CAQH CORE Director) reviewed point of clarification comments related to draft data error handling requirements.
- **Summary of ASG-PA Discussion:**
 - No questions or comments were raised by the ASG-PA participants.
- Bob Bowman (CAQH CORE Director) reviewed point of clarification comments related to draft reassociation requirements.
- **Summary of ASG-PA Discussion:**
 - No questions or comments were raised by the ASG-PA participants.
- Bob Bowman (CAQH CORE Director) reviewed comments related feedback received on CCDA.
- **Summary of ASG-PA Discussion:**
 - No questions or comments were raised by the ASG-PA participants.
- Bob Bowman (CAQH CORE Director) reviewed substantive comments related to draft Reassociation requirements.
- **Summary of ASG-PA Discussion:**
 - No questions or comments were raised by the ASG-PA participants.

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7. Next Steps for ASG-PA (Slides 17-19)	<ul style="list-style-type: none"> • Marianna Singh (CAQH CORE Associate) reviewed the Next Steps for the CAQH CORE Attachments (Prior Authorization Use Case) (ASG-PA) Subgroup: <ul style="list-style-type: none"> ○ <i>CAQH CORE Attachments Subgroup – Prior Authorization (ASG-PA) Co-Chairs & Staff:</i> <ul style="list-style-type: none"> - Draft a call summary for today's subgroup call in preparation for ASG-PA Call #5 on Thursday, 01/28/21. - Continue to monitor CMS' Prior Authorization API NPRM and communicate relevant information to the subgroup on our next call. - Adjust the Draft CAQH CORE Attachments (PA Use Case) Rule Requirements in accordance with subgroup discussion and continue to conduct additional research on key topics. ○ <i>ASG-PA Participating Organizations:</i> <ul style="list-style-type: none"> - Attend the next CAQH CORE ASG-PA call on <u>Thursday, 01/28/21 from 2:30 - 4:00 PM ET.</u> - Stay engaged by attending CAQH CORE's Town Hall on <u>Wednesday, 01/20/21 2:00 – 3:00 pm ET.</u> • Summary of ASG-PA Discussion: <ul style="list-style-type: none"> ○ Deb McCachern (Change Healthcare) mentioned the call overlapped with X12 standing virtual meetings. ○ Bob Bowman (CAQH CORE Director) thanks Deb for bringing awareness and mentioned CAQH CORE would consider new dates and would update the subgroup on changes. 	Action required: Agreed to Next Steps.

Call Documentation
Doc 1: ASG-PA Call 3 Deck 11.05.20.pdf
Doc 2: ASG-PA Call 2 Summary 10.01.20.pdf

CAQH CORE Contact Information

Bob Bowman
Director, CORE
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Marianna Singh
Associate, CORE
msingh@caqh.org

Attachments Subgroup (Prior Authorization Use Case) Call #2 Attendance

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CAQH CORE Participating Organization	Last Name	First Name	Attended
AccuReg Inc.	Uhles	Shelly	
AccuReg Inc.	Howell	Ryan	
Aetna	Morgan	Heather	
Aetna	Hodges	Rose	
Aetna	Neves	Amy	
Aetna	Bellefeuille	Bruce	X
Aetna	Bakos	Janice	
Allscripts	Vaughan	Shay	
American Hospital Association (AHA)	Cunningham	Terrence	
American Medical Association (AMA)	Malavey	Molly	X
American Medical Association (AMA)	Otten	Rob	
American Medical Association (AMA)	McComas	Heather	X
American Medical Association (AMA)	Lefebvre	Celine	X
Anthem Inc.	Bushman	Mary Lynn	
Anthem Inc.	Cioffi	Chris	
Anthem Inc.	Green	Christol	
Anthem Inc.	Henry	Holly	
athenahealth	Prichard	Emily	
athenahealth	Holtschlag	Joe	
athenahealth	Maguire	Kayla	
athenahealth	Currier	Christopher	X
Availity, LLC	Barry	Michelle	
Blue Cross and Blue Shield Association (BCBSA)	Cullen	Rich	
Blue Cross and Blue Shield Association (BCBSA)	Kocher	Gail	X
Blue Cross Blue Shield of Michigan	Edwards	Jeniene	
Blue Cross Blue Shield of Michigan	Knapp	Ron	
Blue Cross Blue Shield of Michigan	O'Malley	Molly	

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Blue Cross Blue Shield of Michigan	Szydowski	Taryn	X
Blue Cross Blue Shield of Michigan	Maldoddi	Laxmikanth	X
Blue Cross Blue Shield of Michigan	Monarch	Cindy	
Blue Cross Blue Shield of Michigan	Siebers	Carl	
Blue Cross Blue Shield of Michigan	Turney	Amy	X
Blue Cross Blue Shield of North Carolina	Smith	Troy	
Blue Cross Blue Shield of North Carolina	Hillman	Barry	X
Blue Cross Blue Shield of North Carolina	Swain	Deborah	X
Blue Cross Blue Shield of North Carolina	Tummala	Sudheer	
Blue Cross Blue Shield of Tennessee	Sims	Jeff	
Blue Cross Blue Shield of Tennessee	Langford	Susan	X
Blue Cross Blue Shield of Tennessee	Poteet	Brian	X
Blue Cross Blue Shield of Tennessee	Mead	Mitch	
Centene Corporation	Weigand	Jennifer	
Centene Corporation	Smart	Dustin	
Centene Corporation	Siddanati	Mahesh	X
Centers for Medicare and Medicaid Services (CMS)	Jones	Melanie	X
Centers for Medicare and Medicaid Services (CMS)	Connor	Beth	X
Centers for Medicare and Medicaid Services (CMS)	Jenifer	Shelly	X
Centers for Medicare and Medicaid Services (CMS)	Leonard	Connie	
Centers for Medicare and Medicaid Services (CMS)	Herring	Geanelle	
Centers for Medicare and Medicaid Services (CMS)	Cabral	Michael	
Centers for Medicare and Medicaid Services (CMS)	Kalwa	Daniel	
Centers for Medicare and Medicaid Services (CMS)	Wheeler	Gladys	
Change Healthcare	Denison	Mike	X
Change Healthcare	Mukker	Alka	
Change Healthcare	Jones	Gregory	

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Change Healthcare	Fleming	Mark	X
Change Healthcare	Johnson	Andrew	
Change Healthcare	McCachern	Deb	X
CIGNA	Soccorso	Megan	X
Cleveland Clinic	Medve	Dan	
Cleveland Clinic	Gross	Bob	X
Cognizant	Thalluri	Sandeep	X
Cognosante	Saunders	Daniel	X
Cognosante	McDaniel	Mary Kay	X
CSRA	Nair	Shilesh	X
CSRA	Cruisce	Jim	
DST Health Solutions	Rogers	Tim	X
DST Health Solutions	Gandolfi	Gary	
DST Health Solutions	Giase	Valerie	X
Edifecs	Boincean	Cristina	
Edifecs	Kelly	John	
Epic	Pasumarthi	Vasu	
Epic	Carino	Santo	X
Government Employees Health Association, Inc. (GEHA)	Enslinger	Darrell	
Harvard Pilgrim Health Care	Starkey	Rhonda	X
Harvard Pilgrim Health Care	Querusio	David	
Health Care Service Corp	Schimanski	Daphney	
Health Care Service Corp	Matzke	Beth	
Health Care Service Corp	Collins	Amanda	
Health Care Service Corp	Campbell	Donna	
Healthedge Software Inc	Brown	Margaret	X
Healthedge Software Inc	Sbihli	Scott	

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CAQH CORE Participating Organization	Last Name	First Name	Attended
HEALTHeNET	Gracon	Christopher	X
Highmark, Inc	Hetherington	LuAnn	
Highmark, Inc	Sweigart	Robert	
Humana	Shick	Brad	
Humana	Jamison	Sandra	
Humana	Peterson	Amy	
Jopari Solutions, Inc	Wilson	Sherry	X
Kaiser Permanente	Southam	Arthur	
Kaiser Permanente	Kessler	Christy	
Laboratory Corporation of America	Woodrome	Laurie	X
Laboratory Corporation of America	Rohrer	Vicki	
Marshfield Clinic	Hoffmann	Glynis	
Marshfield Clinic	Stangret	Pam	
Mayo Clinic	Venhuizen	William	X
Mayo Clinic	Fortek	Rebecca	
Mayo Clinic	Brannan	Andrea	
Mayo Clinic	Kocer	Grant	
Mayo Clinic	Kelly	Benjamin	
Mayo Clinic	Gundavda	Nisha	X
Medical Group Management Association (MGMA)	Tennant	Robert	X
Medical Mutual of Ohio, Inc.	Conklin	Deb	
Michigan Department of Community Health	Veverka	C	X
Michigan Department of Community Health	Fuller	Diana	X
Michigan Department of Community Health	Banks	Deontey	
Michigan Department of Community Health	Hinkle	Lori	
National Council for Prescription Drug Programs (NCPDP)	Weiker	Margaret	
National Council for Prescription Drug Programs (NCPDP)	Strickland	Teresa	

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New England HealthCare Exchange Network (NEHEN)	Brennan	Denny	
New England HealthCare Exchange Network (NEHEN)	Delano	David	
New Mexico Cancer Center	Bateman-Wold	Tonia	
New Mexico Cancer Center	McAneny	Barbara L.	
NextGen Healthcare Information Systems, Inc.	Lopez	Jacqueline	
NextGen Healthcare Information Systems, Inc.	Harris	Gloria	X
NextGen Healthcare Information Systems, Inc.	Schlichtig	Sue	
NextGen Healthcare Information Systems, Inc.	Team	Nancy	X
OhioHealth	Tummalapalli	Krishna	
OhioHealth	Gabel	Randy	X
Ohio Hospitals	Weaver	Quyen	X
OneHealthPort	Rubin	Richard	
OneHealthPort	Campbell	Bill	
PriorAuthNow	Sandhaus	Jay	X
PriorAuthNow	Blackwell	Mike	
PriorAuthNow	Blasinski	Jeffrey	X
Security Health Plan of Wisconsin, Inc. (Marshfield Clinic)	Rock	Laurie	
Security Health Plan of Wisconsin, Inc. (Marshfield Clinic)	Kurtz	Heather	
Security Health Plan of Wisconsin, Inc. (Marshfield Clinic)	Foemmel	Sara	
Security Health Plan of Wisconsin, Inc. (Marshfield Clinic)	Preston	Todd	
Security Health Plan of Wisconsin, Inc. (Marshfield Clinic)	Koch	Steven	
The SSI Group, Inc.	Blossom	Mark	
The SSI Group, Inc.	Butt	David	
The SSI Group, Inc.	Tillman	Tracey	
United States Department of Veterans Affairs	Knapp	Katherine	
UnitedHealthGroup	Shamsideen	Janell	
UnitedHealthGroup	Nordstrom	Alexandria	X

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Verata Health	Backhaus	Brent	X
Virginia Mason Medical Center	Chambers	Kevin	
Virginia Mason Medical Center	Richart	Bri	
Virginia Mason Medical Center	Reeff	Amber	
Wells Fargo	St John	June	
Wells Fargo	Birgenheier	Jason	X