Contents

1.   Overview

1.1 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 COREPrior Authorization Operating Rules, evaluating opportunities identified and prioritized by the CAQH CORE AttachmentsAdvisory Group with the 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 priorauthorization requirements may be impacted by the claims use case requirements' definitions. The finalized draft rule setswill 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 tocomplete 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 opportunityareas 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.

1.2 Format of Straw Poll

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

– **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*
  - *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*
  - *Section 5.4 File Size Requirements for 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*
    - *Subsection 5.2.1 Use of CORE Connectivity vC4.0.0 Headers to Reassociate Additional Documentation Using the Non-X12 Method*
    - *Subsection 5.2.1.1 CORE-required Minimum Attachment Data Elements of Unsolicited Additional Document Using the Non-X12 Method*

2. Summary of Straw Poll Respondents

Responses were received from **37** respondents representing **70%** of ASG-PA participating organizations.

Total Number of Individual Responses	37 (70% of the ASG-PA)
Number of Provider / Provider Association Responses	7 (19% of respondents)
Number of Health Plan / Health Plan Association Responses	12 (32% of respondents)
Number of Vendor / Clearinghouse Responses	11 (30% of respondents)
Number of Government / 'Other' (Includes standards organizations) Responses	7 (19% of respondents)

3. Percent Support for Draft CAQH CORE Attachments (275/278) Infrastructure Rule (Parts A-C)

When the straw poll closed on Friday, 02/19/21, each section of the Draft CAQH CORE Attachments Infrastructure Rule received at least **81% support**, as shown in Table 1 below.

Table 1. Percent Support for Draft CAQH CORE Attachments (275/278) Infrastructure Rule (Parts A-C)

#	ASG-PA Straw Poll #2: Support for Draft CAQH CORE Attachments (275/278) Infrastructure Rule	Support (%)	Do Not Support (%)	Abstain
Part A: Draft CAQH CORE Attachments 275/278 Infrastructure Rule – Scope Sections				
1	Draft CAQH CORE Attachment (275/278) Infrastructure Rule - Scope Sections	28 (82%)	6 (18%)	3
Part B: Draft CAQH CORE Attachments 275/278 Infrastructure Rule – Requirements Related to X12 275 Method				
2	Section 4.1 Processing Mode Requirements	28 (85%)	5 (15%)	4
3	Section 4.2 Connectivity Requirements for X12 275 Attachments	30 (94%)	2 (6%)	5
4	Section 4.3 System Availability Requirements for X12 275 Attachments	32 (97%)	1 (3%)	4
5	Section 4.4 Payload Acknowledgements for X12 275 Transactions	27 (82%)	6 (18%)	4
6	Subsection 4.5.1 Front End Server File Size Requirements for X12 275 Attachments	28 (90%)	3 (10%)	6
7	Subsection 4.5.2 Internal Document management Systems File Size Requirements	26 (84%)	5 (16%)	6
8	Section 4.6 Companion Guide for X12 275 Attachments	32 (97%)	1 (3%)	4
Part C: Draft CAQH CORE Attachments 275/278 Infrastructure Rule – Requirements Related to Non-X12 275 Method				
9	Section 5.1 Connectivity Requirements for Additional Documentation Using CORE Connectivity	29 (91%)	3 (9%)	5
10	Section 5.2 System Availability and Reporting Requirements for Additional Documentation	29 (91%)	3 (9%)	5
11	Section 5.3 Payload Acknowledgements for Additional Documentation Using the Non-X12 Method	26 (81%)	6 (19%)	5
12	Subsection 5.4.1 Front End Server File Size Requirements for Additional Documentation	28 (90%)	3 (10%)	6
13	Subsection 5.4.2 Internal Document Management Systems File Size Requirements	27 (87%)	4 (13%)	6

4. Percent Support for Draft CAQH CORE Attachments (275/278) Data Content Rule (Parts D-F)

When the straw poll closed on Friday, 02/19/21, each section of the Draft CAQH CORE Attachments (275/278) Data Content Rule received at least **75% support**, as shown in Table 2 below.

Table 2. Percent Support for Draft CAQH CORE Attachments (275/278) Data Content Rule (Parts D-F)

#	ASG-PA Straw Poll #2: Support for Draft CAQH CORE Attachments (275/278) Data Content Rule	Support (%)	Do Not Support (%)	Abstain
Part D: Draft CAQH CORE Attachments 275/278 Data Content Rule – Scope Sections				
14	Draft CAQH CORE Attachments (275/278) Data Content Rule- Section 3 Scope	29 (85%)	5 (15%)	3
Part E: Draft CAQH CORE Attachments 275/278 Data Content Rule – Requirements Related to X12 275 Method				
15	Section 4.1 Data Error Handling Requirements	26 (84%)	5 (16%)	6
16	Section 4.2.1 Reassociation of Unsolicited X12 275 to an X12 278 Request	30 (94%)	2 (6%)	5
17	Subsection 4.2.1.1 Common Reference Data Used to Reassociate an X12 278 Request	30 (94%)	2 (6%)	5
18	Section 4.2.2 Reassociation of a Solicited X12 275 and an X12 278 Request	29 (91%)	3 (9%)	5
Part F: Draft CAQH CORE Attachments 275/278 Infrastructure Rule – Requirements Related to Non-X12 275 Method				
19	Section 5.1 Data Error Handling Requirements	24 (75%)	8 (25%)	5
20	Section 5.2.1 Use of CORE Connectivity Headers to Reassociate Additional Documentation	27 (90%)	3 (10%)	7
21	Subsection 5.2.1.1 CORE-Required Minimum Attachment Data Elements	26 (84%)	5 (16%)	6

5. Summary of ASG-PA Straw Poll Comments Received

Respondents were given the opportunity to provide comments on each of the questions asked on the straw poll. As always, three categories of comments were received:

1. **Points of Clarification** – Pertain to areas where more explanation for the Subgroup is required; *may* require adjustments to the draft rules, which do not change rule requirements.
2. **Substantive Comments** – May impact rule requirements; some comments require Subgroup discussion on suggested adjustments to the draft requirements.
3. **Non-substantive Comments** – Pertain to typographical/grammatical errors, wordsmithing, clarifying language, addition of references; do not impact rule requirements. Non-substantive comments do not require Subgroup discussion, CAQH CORE staff will make these adjustments to the requirements, as necessary. **NOTE**: We will not be reviewing these comments on today's call, but they are available in a supplemental document sent to the subgroup for offline review. Please be sure to review these comments as there are several adjustments for clarity included in this section.

The tables below summarize substantive comments and points of clarification submitted by ASG-PA Straw Poll respondents. For substantive comments, the table includes ASG-PA Co-Chair and staff recommendations, but discussion on these comments is encouraged.

6. Comments Received on Part A: Draft CAQH CORE Attachments (275/278) Infrastructure Rule - Scope Sections

Table 3 below summarizes points of clarification and substantive comments received from ASG-PA Straw Poll respondents pertaining to Part A: Draft CAQH CORE Attachments (275/278) Infrastructure Rule- Scope Sections along with CAQH CORE ASG-PA Co-chair and staff responses. **Non-substantive comments are available in Doc 4: ASG-PA Straw Poll 2 Non-Substantive Comments offline review.**

Table 3. Comments Received on Part A: Draft CAQH CORE Attachments (275/278) Infrastructure Rule - Scope Sections

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-Chair & Staff Response
		Points of Clarification	
1.	**3 Scope**	Nine entities commented on the versions of the X12 transactions included in the scope: - Two of these stated CAQH CORE Operating Rules should be written to support future versions, not just the 6020. - Another commented CAQH CORE should not specify the X12 version/release in an operating rule, as that can cause confusion and inhibit adoption. They also noted health plans currently do not process the 5010 version of the 275. - Another stated they do not have access to view 6020 versions of the transactions and therefore cannot support the draft scope section. - Another noted the 6020 version of the 999 is not used in industry at this time and should not be promoted. - Another asked for clarification as to whether the rule requires both versions 5010 and 6020 of the 275 to be implemented, noting that an entity cannot use both versions at the same time. - Another stated that every transaction should follow the same standard version of either 5010 or 6020 and noted that organizations may not be able to support the hybrid of 5010/6020.	**Do not adjust.** CAQH CORE ASG-PA Co-chairs and staff recommend specifying X12 v6020X316 275 in alignment with previous [X12 recommendations to NCVHS](#) to support X12 v5010X217 278 Prior Authorization transactions. Given X12 v5010X217 278 is currently specified in the CAQH CORE Prior Authorization Rules and is the HIPAA mandated version, ASG-PA Co-chairs and staff recommend supporting X12 v5010X217 278 for consistency across existing CORE Operating Rules and recommend support for X12 v6020X316 275, as it best addresses current industry needs. As such, CAQH CORE has drafted these attachment infrastructure requirements for the: - **X12 v6020X316 275** + the associated **X12 v6020X290 999** and **X12 v6020X257 824** transactions in support of - **X12 v5010X217 278** Prior Authorizations + the associated **X12 v5010X231 999** acknowledgements.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-Chair & Staff Response
		- Another noted the language should be clarified in Section 3.3 to reference version 6020 of the 999 transaction as the appropriate response to the version 6020 275 transaction and version 5010 999 would be used for the version 5010 278 Request. - One entity noted version 7030 of the 824 should be used due to the limitations of version 6020 provide details on HL7 standards embedded in the BDS segment of the 275.	X12 acknowledgements must match the version of the transaction they are associated with to reliably report the transaction set being conducted; therefor, both v5010 and v6020 are included in the scope of this rule. Additionally, according to the X12 Registry, v6020 TR3s are published and available for the 275, 824, and 999 transactions to support health care services review. Finally, CAQH CORE has a detailed maintenance process to update CAQH CORE Operating Rule when new versions are made available (including X12 v7030X231 824) and when HHS designates them for mandate.
2.	**3.1 What the Rule Applies to**	Two entities asked for clarification regarding the inclusion of HL7 C-CDA R2.1 in the draft rule: - One explained that 'HL7 C-CDA R2.1' should not be mentioned in the draft scope section because HL7 recommended it should be proposed in the Attachments Regulation. Another asked for further explanation on the inclusions of the footnote referencing the HL7 CDA R2 Attachment IG.	**Do not adjust.** The inclusion of HL7 C-CDA serves as only an example of a non-X12 payload type that can be supported in the BDS segment of the X12 v6020X316 275 or exchanged without the use of the X12 v6020X316 275. Specific versions of the specification will not be addressed in this CORE operating rule. The footnote pertaining to HL7 CDA R2.1 serves as an additional reference to the most recent published version of the specification.
3.	**3.3 What the Rule Does Not Require**	One entity noted this rule section should clarify the draft CAQH CORE Attachments (275/278) Infrastructure Rule does not require providers to use the 275 transaction to send attachments to support a prior authorization request and does not imply that health plans can demand that provider use the 275 transaction.	**Adjust for clarity.** CAQH CORE ASG-PA Co-chairs and staff recommends adding a footnote for clarity.

7. Comments Received on Part B: Draft CAQH CORE Attachments (275/278) Infrastructure Rule - Requirements Related to X12 275 Method

Table 4 below summarizes comments received from ASG-PA Straw Poll respondents pertaining to the Draft CAQH CORE Attachments (275/278) Infrastructure Rule - Requirements Related to X12 275 Method (Part B) along with CAQH CORE ASG-PA Co-chair & staff responses. **Non-substantive comments are available in Doc 4: ASG-PA Straw Poll 2 Non-Substantive Comments for offline review.**

Table 4. Comments Received on Part B: Draft CAQH CORE Attachments (275/278) Infrastructure Rule - Requirements Related to X12 275 Method

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
		Points of Clarification	
		Section 4.1 Processing Mode Requirements for X12 275 Attachments	
1.	**4.1 Processing Mode**	One entity noted that the requirement to support both Real Time and Batch Processing Modes is inconsistent with the CAQH CORE 278 Prior Authorization Operating Rule, which allows entities to support either Real time Processing <u>or</u> Batch Processing.	**Adjust for Clarity.** CAQH CORE ASG-PA Co-chairs and staff recommend adjusting the draft rule language to state entities must support either Real Time or Batch Processing Modes, with the option to support both, in alignment with the <u>CAQH CORE Prior Authorization & Referrals Operating Rules</u>.
2.	**4.1 Processing Mode & Section 4.4 Payload Acknowledgements & Response Time**	Three entities asked for clarification on the Draft Real Time Processing Mode Requirements. - Two asked for clarification on the 20 second turn around time requirement for Real Time, noting the use of intermediaries may require more time due to attachment types and sizes. Another respondent stated they do not support Real Time Processing Mode Requirements as the timing for Real Time Processing is built around smaller transactions and does not consider larger file sizes that may be exchanged with attachments or additional documentation.	**Do not adjust**. Given **85%** of ASG-PA Respondents supported the Draft Processing Mode Requirements, and **82%** supported the Draft Payload Acknowledgement & Response Time Requirements as written, CAQH CORE ASG-PA Co-chairs and staff recommend not adjusting the Draft Real Time Processing Mode or the Draft Payload Acknowledgement & Response Time Requirements. The Draft Real Time Processing Mode Requirements pertain to the transaction and acknowledgements at the interchange and payload layer. The draft requirements do not require a detailed response of the data content of contained within the attachment. Additionally, the 20 second Real Time response is consistent with all prior CAQH CORE Infrastructure Rules which recommends that each hop between trading partners last no more than 4 seconds, accounting for time between intermediaries.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
**Section 4.2 Connectivity Requirements for X12 275 Attachments**			
3.	**4.2 Connectivity Requirements**	Two entities asked for clarification around the required use of CAQH CORE Connectivity Rule vC4.0.0: - One of these asked why Connectivity vC4.0.0 is specified instead of the federally mandated version. - Another recommended adjusting the rule requirement to state that it is subject to prospective mandate/adoption.	**Adjust for Clarity.** The CAQH CORE Connectivity Rule vC4.0.0 includes requirements for the exchange of messages using both SOAP and REST. Additionally, vC4.0.0 includes support for the X12 v6020X316 275 attachments transaction in the scope of the rule meaning that the rule applies when trading partners exchange the X12 v6020X316 275. The rule applies to other payload types (e.g., HL7 C-CDA, .pdf, .doc, etc.) and as such, serves as a bridge between administrative and clinical data exchange by utilizing both X12 and non-X12 payload types. Per the CAQH CORE Rule development process, published CAQH CORE Operating Rules may be presented to the National Committee on Vital Health Statistics (NCVHS) for federal mandate. As such, CAQH CORE Co-chairs and staff recommend adjusting the draft rule language to clarify that an entity must be able to support the most current published and CAQH CORE adopted version of the CAQH CORE Connectivity Rule, currently CORE Connectivity vC4.0.0. This adjustment will be made throughout the draft rule.
**Section 4.4 Payload Acknowledgements for X12 275 Attachments**			
4.	**4.4 Payload Acknowledgements**	One entity noted that the receipt of an X12 v6020 275 transaction or issuance of an acknowledgement in response to an X12 v6020 275 transaction does not initiate the evaluation of an X12 v5010 278 Request. Only the receipt of an X12 v5010X217 278 Request initiates the evaluation.	**Adjust for Clarity.** CAQH CORE staff recommends adjusting the draft payload acknowledgment language for clarity.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
5.	**4.4.1.2 Response Time Requirements for Availability of Acknowledgements**	One entity asked for clarification as to whether the draft rule requirement specifies that 90% of X12 999 transactions must be returned within one calendar month.	**Do not adjust.** The draft payload acknowledgement requirements include a note stating, "Each HIPAA-covered entity and its agent only needs to support the maximum response time in 90% of cases per calendar month". In other words, entities must meet the timing requirement in 90% of cases per month. This accounts for system malfunctions, complex prior authorization and/or attachment submissions and unplanned system outages. This exception is consistent across all CAQH CORE Operating Rules for acknowledgements at the payload level and reflects the understanding throughout the industry that there may be instances where adherence to the response time requirements is not feasible.
6.	**4.4 Payload Acknowledgements**	One entity explained that they do not support the inclusion of end-user text because user interfaces are outside of the scope of EDI. They added that acknowledgements have not been included to date in any federally mandated operating rules and therefore may be excluded if these rules are recommended for adoption to NCVHS.	**Adjust for Clarity.** The draft payload acknowledgment requirements are intended to apply to the system and provide error reporting regarding technical compliance with the X12 standard. CAQH CORE ASG-PA Co-chairs and staff recommend adjusting the draft language to clarify that application of the error messages to the system, and any text displayed, shall accurately represent the error code and corresponding error description specified in the related X12 v6020X290 999 without changing the meaning and intent of the error condition description. The actual wording of the text displayed is at the discretion of HIPAA-covered providers and their agents. In addition, CAQH CORE rules have addressed the use of X12 999 acknowledgements for all transactions, given their primary purpose is to serve as a compliance check to the X12 standards and their use does not require federal regulation.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
		Section 4.5 File Size Requirements for X12 275 Attachments	
7.	**4.5 File Size**	One entity asked if the recipient of the X12 v6020 275 attachment would be allowed to define a maximum size allowable and if a requirement could be added. They also asked for clarification as to whether the 64MB minimum applies to the entire 275 if it is batch or if the 64MB applies to the individual items within the batch.	**Do not adjust.** Like prior CAQH CORE Operating Rule requirements, this potential rule option represents a floor and not a ceiling in terms of the file size an organization can accept for processing. Entities may choose to accept file sizes above 64MB, but they must at a minimum accept at least as large as 64MB. Smaller file sizes can be accepted. The 64MB applies to the entire content of the BDS segment of the X12 v6020X316 275 transaction. Accounting for previous subgroup discussion, a provider may need to send large files, there CAQH CORE Staff and Co-chairs **do not** recommend specifying a maximum size allowable. CAQH CORE conducted extensive research and straw polling on the topic prior to the launch of the ASG-PA through the attachments environmental scan and the CAQH CORE Attachment Advisory Group. Additionally, the draft file size requirements received **90%** and **84%** support, respectively, from ASG-PA straw poll respondents in this straw poll. CAQH CORE will continue to conduct research on the file size, as necessary.
8.	**4.5.2 File Size Requirements – Internal Document Management Systems**	Two entities asked for clarification regarding internal document management systems. - One entity noted that because internal document management systems are not covered by regulation, an operating rule would have no jurisdiction to include requirements on them. - Another entity noted internal systems are outside the scope of EDI.	CAQH CORE, as the official operating rule author and industry convener, is responsible for engaging the healthcare industry in developing consistent business processes for patients, providers and health plans to streamline the business of healthcare via a collaborative and consensus driven process. Furthermore, CAQH CORE Operating Rule requirements are not limited to systems and standards the federal government regulates; they can expand to utilize systems which address industry needs. CAQH CORE develops requirements that support the adoption of standard processes and ancillary systems requirements supportive of EDI-based interchange.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
		Substantive Comments	
		Section 4.4 Payload Acknowledgements for X12 275 Attachments	
9.	**4.4 Payload Acknowledgements**	Two entities submitted comments regarding the role of X12 v6020 824 in acknowledging receipt of an X12 v6020 275. - One entity noted that the X12 v6020 824 transaction is included in the scope of the rule, but there are not associated requirements in the Draft CAQH CORE Attachments (275/278) Infrastructure Rule. They recommended adding a requirement pertaining to the processing of the X12 v6020 824 to Section 4.4 Payload Acknowledgements. - Another asked for clarification around the processing steps and need for an X12 999 functional acknowledgment (FA) in Real Time Processing Mode where the X12 275 payload is accepted without errors and the X12 824 response is subsequently sent.	**Adjust for Clarity**. CAQH CORE ASG-PA Co-chairs and staff recommend moving the Draft Attachments Data Content Rule Data Error Handling Requirements pertaining to the X12 v6020X257 824 transaction to the Draft CAQH CORE Attachments (275/278) Infrastructure Rule. The section will proceed the Payload Acknowledgement requirements, similar to prior CAQH CORE Infrastructure Rules. When an X12 6020X316 275 is submitted, it goes through several initial layers of error handling, from HTTP to Payload Processing Layer to Initial Data Content Processing Layer. If there is an error in processing the message at any layer, the X12 6020X316 275 submission does not get passed on. If no errors are encountered at a layer, the submission is passed to the next processing layer. Upon passing the Payload Processing Layer, an X12 999 FA is sent to acknowledge acceptance. Once the Initial Data Content Processing Layer processes the content of the payload, the receiver (server) must return an X12 v6020X257 824 to report acceptance or any errors in the payload. **NOTE:** Figure 4.1 CAQH CORE Connectivity included in the Draft CAQH CORE Attachments (275/278) Data Content Rule is provided in the Appendix of this document for reference.

8. Comments Received on Part C: Draft CAQH CORE Attachments (275/278) Infrastructure Rule - Requirements Related to the Non-X12 Method

Table 5 below summarizes comments received from ASG-PA Straw Poll respondents pertaining to the Draft CAQH CORE Attachments (275/278) Infrastructure Rule- Requirements Sections Related to the Non-X12 Method (Part C) along with CAQH CORE ASG-PA Co-chair & staff responses. **Non-substantive comments are available in Doc 4: ASG-PA Straw Poll 2 Non-Substantive Comments for offline review.**

Table 5. Comments Received on Part C: Draft CAQH CORE Attachments (275/278) Infrastructure Rule - Requirements Related to the Non-X12 Method

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
		Points of Clarification	
		Section 5.1 Connectivity Requirements for Additional Documentation Using CORE Connectivity	
1.	**5.1 Connectivity (Non-X12 Method)**	One entity suggested combining Sections 4.2 Connectivity Requirements and 5.1 Connectivity to avoid repetition. They noted the Draft CAQH CORE Attachments (275/278) Infrastructure Rule requires the same support for both X12 and non-X12 methods.	**Do not adjust.** The CAQH CORE process centers on an integrated model consisting of rule development, education, testing/certification, and measuring/tracking. To ease implementer burden as entities seek to certify their organization's software, systems, applications, etc. in this draft Operating Rule Set, rule requirements are separated by exchange method. Having separate sections by exchange method will support the drafting and final format of the CAQH CORE Test Suite that supports CORE Certification. Additionally, given the draft requirements do not require entities to exchange additional documentation using the non-X12 method, the format of the current draft rule allows implementers to review only the requirements of the exchange method for which they are certifying.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
		Substantive Comment	
		Section 5.3 Payload Acknowledgements for Additional Documentation Using the Non-X12 Method	
2.	**5.3 Payload Acknowledgements (Non-X12 Method)**	Eight entities asked for clarification around acknowledgements for additional documentation exchanged without an X12 275 transaction. - Six of these commented that the use of the X12 v5010 278 as an acknowledgement was unclear and explained that the X12 v5010 278 is not intended to serve this purpose. As such, there is no segment within the X12 v5010 278 to serve as an acknowledgment (e.g., to respond with the proper error message describing an invalidly formatted FHIR resource). Furthermore, the rule language is unclear as to whether the X12 v5010 278 Response is in addition to the original response to the 278 Request. Lastly, if a provider sends additional documentation in a non-X12 format, health plans should not be required to respond with an X12 transaction. - Another mentioned that non-X12 formats do not have defined acknowledgement transactions the way X12 275 payloads do; therefore, CAQH CORE shouldn't have requirements on non-X12 formats. - Another suggested CAQH CORE should adjust the draft rule requirement language to state, "If the non-X12 method utilized to submit additional documentation to the health plan allows for acknowledgements, then health plans should acknowledge receipt within 24 hours". They noted that depending on the non-X12 method used to send additional documentation, there may exist means to acknowledge the receipt of the additional documentation.	**For ASG-PA Discussion.** CAQH CORE ASG-PA Co-chairs and staff recommend removing this rule requirement section and including a footnote specifying that an X12 v5010X217 278 final determination Response will be sent for the original X12 v5010X217 278 prior authorization Request with an approval, pend or denial and that these requirements are detailed in prior CAQH CORE rules. **NOTE:** CAQH CORE Connectivity relies on HTTP layers for operation of receipt, which provide their own messaging at each specific layer (e.g., HTTP Error Codes). As such, additional definition, timing or response time requirements are not specified here as these are defined and maintained by the Internet Assigned Numbers Authority (IANA) and CAQH CORE does not repeat requirements defined by their recognized Authority.

9. Comments Received on Part D: Draft CAQH CORE Attachments (275/278) Data Content Rule - Scope Sections

Table 6 below summarizes comments received from ASG-PA Straw Poll respondents pertaining to the Draft CAQH CORE Attachments (275/278) Data Content Rule- Scope Sections (Part D) along with CAQH CORE ASG-PA Co-chair & staff responses. **Non-substantive comments are available in Doc 4: ASG-PA Straw Poll 2 Non-Substantive Comments for offline review.**

Table 6. Comments Received on Part D: Draft CAQH CORE Attachments (275/278) Data Content Rule - Scope Sections

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-Chair & Staff Response
		Points of Clarification	
1.	3 Scope	Six entities asked for clarification on the versioning for each of the transaction listed in the Scope section of the rule: - One entity noted that *Section 3 Scope* includes v5010X217 278, but Section 4 includes v6020X316 275 and asked if the rule applies to both v5010 278 and v6020 278. They also noted that specifying an X12 transaction version will limit the Operating Rule's use and confuses implementors who already process 278/275 transactions in v5010. - Another recommended adjusting the scope of the rule to clarify that v6010 999 must be returned in response to v6010 275, but v5010 999 must be returned in response to v5010 278 Requests. - Two commented that they believe the X12 transactions included in the scope of the rule should all follow the same version – either v5010 or v6020. They noted that trading partner systems may not be able to support a hybrid of 5010/6020 systems. This comment was repeated throughout the straw poll. - Another two entities explained that they support all transactions listed but were unsure of when version 6020 is required. One recommended including v7030 824, once published, as it includes additional details on supporting the HL7 standard embedded in the 275 BDS segment.	**Do not adjust.** CAQH CORE ASG-PA Co-chairs and staff recommend specifying X12 v6020X316 275 in alignment with previous X12 recommendations to NCVHS to support X12 v5010X217 278 Prior Authorization transactions. Given X12 v5010X217 278 is currently specified in the CAQH CORE Prior Authorization Rules and is the HIPAA mandated version, ASG-PA Co-chairs and staff recommend supporting X12 v5010X217 278 for consistency across existing CORE Operating Rules and support for X12 v6020X316 275 as it best addresses current industry needs. As such, CAQH CORE has drafted these attachment infrastructure requirements for the: - **X12 v6020X316 275** + the associated **X12 v6020X290 999** and **X12 v6020X257 824** transactions in support of - **X12 v5010X217 278** Prior Authorizations + the associated **X12 v5010X231 999** acknowledgements. Given acknowledgements must match the version of the transaction they are associated with to reliably report transaction set TR3 revisions in the newer X12 transaction version that an older version would not be able to detect, both v5010 and v6020 are included in the scope of this rule. CAQH CORE has a detailed maintenance process to update CAQH CORE Operating Rule when new versions are made available (including X12 v7030X321 824) and when HHS designates them for mandate.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-Chair & Staff Response
2.	3 Scope	One entity noted that they do not support the rule applying to other payload types (e.g., HL7 C-CDA, .pdf, etc.) and non-X12 exchange scenarios (e.g., CORE Connectivity, FHIR etc.) because the rules should be specific to HL7 C-CDA and FHIR.	**Do not adjust.** The recently updated CAQH CORE Connectivity Rule vC4.0.0 is required for use in this draft rule and is payload agnostic. This means that it can support any non-X12 payload (e.g., HL7 C-CDA, FHIR Resources, .pdf, doc, etc.). because it is not aware of the information it carries. The only exchange scenario used by this Draft CAQH CORE Attachment Data Content Rule is CORE Connectivity vC4.0.0.
3.	3 Scope	One entity recommended that *Section 3 Scope* include a statement clarifying that providers are not required to use the X12 275 transaction to send attachments in support of an X12 278 Request. They also note that Section *3.3 What the Rule Does Not Require* may conflict with *Section 3.1 What the Rule Applies to* as the rule does apply to non-X12 transactions.	**Adjust for clarity.** CAQH CORE ASG-PA staff will include a footnote in the draft rule that specifies that providers are not required to use non-HIPAA mandated transactions, including the X12 v6020X316 275 transaction, to send an attachment or additional documentation. CAQH CORE ASG-PA Co-chairs and staff also recommend adjusting *Section 3.3* to clarify that the rule *does* apply to non-X12 payloads.

10. Comments Received on Part E: Draft CAQH CORE Attachments (275/278) Data Content Rule - Requirements Related to the X12 275 Method

Table 7 below summarizes comments received from ASG-PA Straw Poll respondents pertaining to the Draft CAQH CORE Attachments (275/278) Data Content Rule – Requirements Related to the X12 275 Method (Part E) along with CAQH CORE ASG-PA Co-chair & staff responses. **Non-substantive comments are available in Doc 4: ASG-PA Straw Poll 2 Non-Substantive Comments for offline review.**

Table 7. Comments Received on Part E: Draft CAQH CORE Attachments (275/278) Data Content Rule - Requirements Related to the X12 275 Method

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
		Points of Clarification	
		Section 4.1 Data Error Handling Requirements for X12 275 Attachments	
1.	**4.1 Data Error Handling**	One entity recommended that X12 v6020 824 should not be used to indicate an acceptance, only to communicate error reasons.	**Do not adjust.** Given **83%** of ASG-PA straw poll respondents supported this requirement and to comply with appropriate electronic data interchange, a X12 v6020X257 824 should be returned when the X12 v6020X316 275 is accepted and the system is processing the payload. Indicating acceptance with the X12 v6020X257 824 is the only way the sending system can know if the receiving system was able to process the binary data in the X12 v6020X316 275.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
2.	**4.1 Data Error Handling**	Two entities asked for clarification as to when the X12 v5010 999, X12 v6020 999 and X12 v6020 824 transactions are required. - One of these asked about the difference between an X12 999 sent at the Payload Processing Layer and an X12 999 sent at the Initial Data Content Layer. - The other asked for clarification on the processing step pertaining specifically to Real Time Processing.	**Adjust for clarity.** CAQH CORE ASG-PA Co-chairs and staff recommend adjusting the draft requirement language to clarity the usage of the X12 v6020 824 to specify that it is independent from other X12 responses to the X12 v5010 278 Response and X12 v6020 999. The CAQH CORE Connectivity Rule vC4.0.0 includes requirements for the exchange of messages using both SOAP and REST. Additionally, vC4.0.0 includes support for the X12 v6020X316 275 attachments transaction in the scope of the rule meaning that the rule applies when trading partners exchange the X12 v6020X316 275. The rule may also be applied to other payload types (e.g., HL7 C-CDA, .pdf, .doc, etc.). As such, it serves as a bridge between administrative and clinical data exchange by utilizing both X12 and non-X12 payload types. **NOTE:** CAQH CORE Connectivity relies on HTTP layers for operation of receipt, which provide their own messaging at each specific layer (e.g., HTTP Error Codes). As such, additional timing or response time requirements cannot be specified.
	Section 4.2 Reassociation Requirements for X12 275 Attachments		
3.	**4.2.1 Reassociation – Use of Code EL** *(Unsolicited Scenario)*	One entity explained that the subgroup can not assume a provider will know whether they will need to send unsolicited attachments via the X12 275 transaction when sending the original X12 278 Request. In other words, an X12 278 Request is typically submitted by the time the need for unsolicited attachments becomes apparent.	**Adjust for clarity.** CAQH CORE ASG-PA Co-chairs and staff will adjust the draft reassociation requirements to clarify that providers are not required to send an unsolicited X12 v6020X316 275. In other words, the requirement only applies in instances when the provider sends an unsolicited X12 v6020X316 275, but they are not required to do so.

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
4.	**4.2.2 Reassociation – Use of Code EL** *(Solicited Scenario)*	One entity commented that they believe PWK Code EL on its own is not sufficient to notify the provider what additional documentation is needed.	**Do not adjust.** PWK Code EL is used by payers to notify providers that additional documentation is to be submitted electronically in support of an X12 v5010X217 278 Request.
5.	**4.2.2 Reassociation – Use of Code EL** *(Solicited Scenario)*	One entity noted that the current language suggests that a payer can require the provider to use the X12 275 transaction instead of another exchange method.	**Adjust for clarity.** CAQH CORE ASG-PA Co-chairs and staff will adjust the draft reassociation language to clarify that providers are not required to send additional documentation via the X12 275 transaction.
6.	**4.2.1 and 4.2.2 Reassociation – Use of Code EL** *(Unsolicited & Solicited Scenario)*	One entity suggested the use of PWK06 (Attachment Control Number) on the X12 278 transaction and the TRN Segment (Attachment Control Number) for the X12 275 transaction.	**Do not adjust.** CAQH CORE ASG-PA Co-chairs and staff recommend not including the use of PWK06 and the TRN Segment in the X12 v5010X217 278 Response for the X12 v6020X316 275 transaction given the TR3 has semantic requirements of where and when to use the PWK06 and the CORE rules do not repeat requirements found in standards.

11. Comments Received on Part F: Draft CAQH CORE Attachments (275/278) Data Content Rule - Requirements Related to the Non-X12 Method

Table 8 below summarizes comments received from ASG-PA Straw Poll respondents pertaining to the Draft CAQH CORE Attachments (275/278) Data Content Rule - Non-X12 275 Method (Part F) along with CAQH CORE ASG-PA Co-chair & staff responses. **Non-substantive comments are available in Doc 4: ASG-PA Straw Poll 2 Non-Substantive Comments for offline review.**

Table 8. Comments Received on Part F: Draft CAQH CORE Attachments (275/278) Data Content Rule - Non-X12 275 Method

#	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
		Points of Clarification	
		Section 5.2 Reassociation Requirements for Non-X12 Method	
1.	5.2.1.1 Reassociation: CORE-required Minimum Data Elements *(Non-X12 method)*	Four entities asked for additional clarity on the CORE-required Minimum Data Elements and provided recommendations for data element adjustments: - Three entities noted that '*Auth # ID*' may not be available at the time the attachment is sent to the payer because the Prior Authorization ID is not created until a final decision is issued. - Another explained that as drafted, it will require someone to review documents manually or OCR software to analyze and match an attachment to the 278 Request. They recommended using structured information and a unique identifier to match 278 Requests to attachments. - Another recommended that '*DOS'* and '*Procedure Code*' should not be required and suggested the following adjustments to data element names: • *Patient ID* → Patient Account # • *Provider ID* → NPI <u>or</u> TIN • *Auth ID* → Attachment # - Another asked for adjustments to the following elements: • *Member ID* – recommended greater specificity as it can differ between payers/providers. • *DOB* – recommended establishing a common format. • *Patient ID* – recommended greater specificity in the description. • *DOS* – recommended greater specificity for date of planned service description.	**Adjust for clarity**. CAQH CORE ASG-PA Co-chairs and staff will adjust the Draft CORE-required Minimum Data Elements to use labels and descriptions that indicate that the data could be originating within the provider's system or the payer's system. As such, the data would not need to be compliant with X12. The metadata concepts are not unique to, nor do they need to correspond to X12 data elements. Additionally, CAQH CORE ASG-PA Co-chairs and staff recommend clarifying that the data elements included in the table are only required for the information available to the provider. In other words, if the information is not available, it is not required.

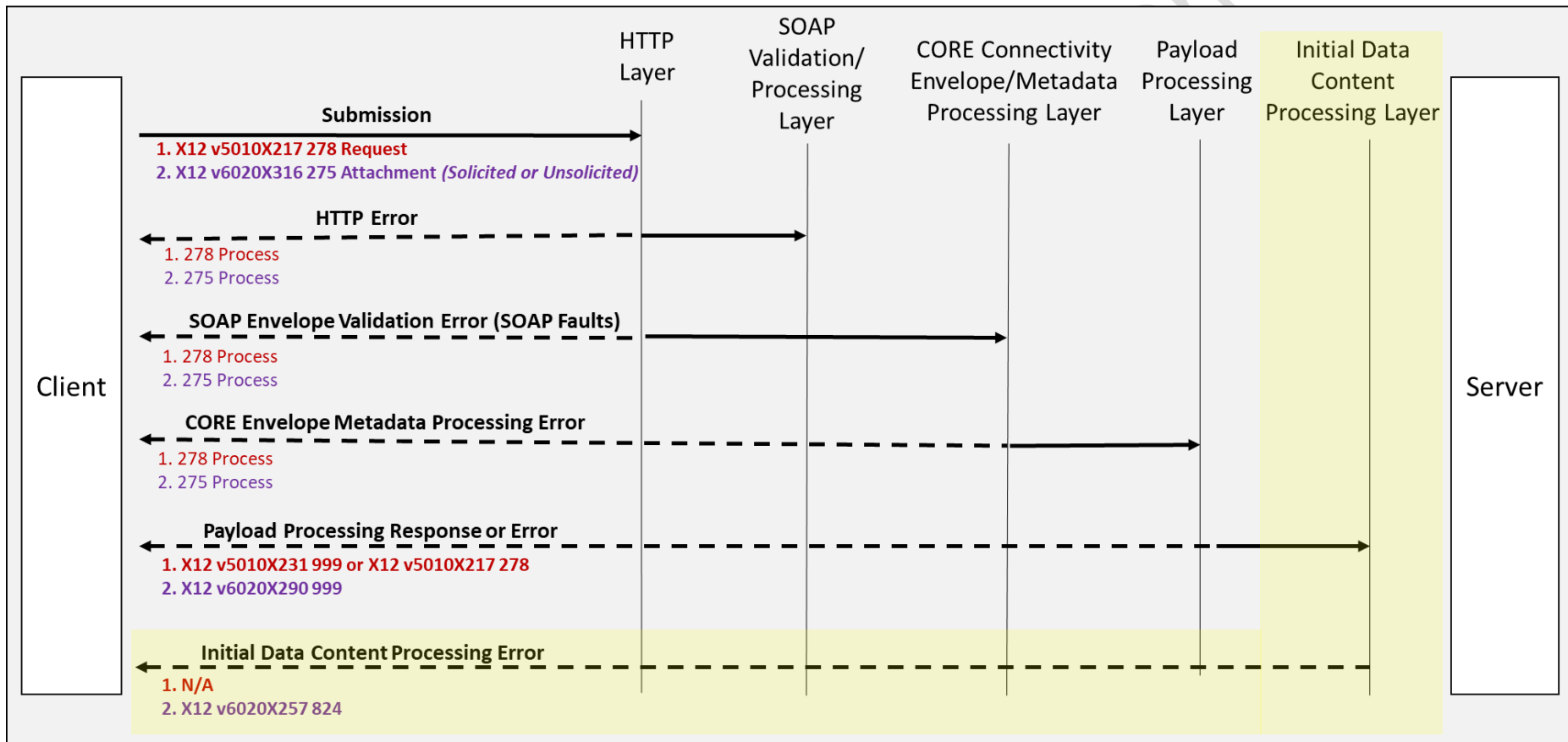| #	Section	Summary of Comments	CAQH CORE ASG-PA Co-chair & Staff Response
		Substantive Comments	
		Section 5.1 Data Error Handling for Additional Documentation Using the Non-X12 Method	
2.	5.1 Data Error Handling *(Non-X12 method)*	Five entities provided explanation for their non-support of the requirement:	**For ASG-PA Discussion.** CAQH CORE ASG-PA Co-chairs and staff recommend removing this section from the draft rule for clarity. Given this section only referenced requirements in other rule sets and is not needed.
		- One entity noted that the requirement implies that an X12 278 Response + CAQH CORE Prior Authorization (278) Operating Rules should be used to acknowledge receipt of a non-X12 document.	
		- Another explained that since the receiving system would have already sent back an X12 999 for the original X12 278 Request, there should not be an additional X12 999 sent referencing the X12 278 Request.	
		- Another commented that sending only an X12 278 Response would be more appropriate than sending both the X12 999 and X12 278 Response.	
		- Another suggested using the Inquiry and Response 278 TR3 in the message segment if the UMO wants to communicate where they are with the UM Decision process. Otherwise, trading partner agreements would have to include some type of non-X12 confirmation communication that additional information was received.	
		- Another stated that the Draft CAQH-CORE Attachments (275/278) Infrastructure Rule specifies that a non-X12 275 transaction cannot be acknowledged with an X12 999 transaction. However, Section 5.1 Data Error Handling of the Data Content Rule specifies that payers are to send an X12 999 in response to a non-X12 275, contradicting the Draft Infrastructure Rule.	
		Additionally, they noted that there is not a data segment in the X12 278-217 that serves this data error handling purpose and that the X12 278 Response should be reserved for the payer's request of additional information from the submitter, or for the payer's final decision.	

12. Next Steps

- **CAQH CORE ASG-PA Co-Chairs and staff will:**
  - Adjust the Draft CAQH CORE Attachment (275/278) Infrastructure Rule and Draft CAQH CORE Attachment (275/278) Data Content Rule in accordance with Subgroup discussion on today's call.
  - Continue to conduct further research on key topics in preparation for our transition to attachments for claims transactions.
  - Draft a call summary for today's call and post it on the CAQH CORE Participant Dashboard for participant review.

- **Attachments Subgroup (PA Use Case) participants will:**
  - **Join the next stage of the attachment rule development process** by joining the CAQH CORE Attachments Subgroup – Claims Use Case.
    - Submit the online Call for Participants form by Friday, March 5th to join.
    - The CAQH CORE Attachments Subgroup – Claims Use case will continue the rule development efforts started by this group and will ensure parity across both use case Rule Sets.
  - **Explore the new CAQH CORE Participant Dashboard**, to find prior meeting materials including, work group results documents and call summaries, upcoming events/notifications, and updated draft rule language.

13. Appendix A: CAQH CORE Connectivity – Error Handling Process Image

Appendix A consists of an image depicting CAQH CORE Connectivity – Error Handling Processing Layers

Figure 1. CAQH CORE Connectivity – Error Handling*
NOTE: <mark>Highlighted</mark> Initial Data Processing Layer is **not included** in CORE Connectivity

* Although not addressed in the Draft CAQH CORE Attachments (275/278) Operating Rules, the figure above depicts where the separate processes for the X12 278 Request and X12 275 Attachment submissions would continue through CAQH CORE Connectivity Error Handling Layers.