CAQH Committee on Operating Rules for Information Exchange (CORE)
CAQH CORE Attachments Subgroup – Claims Use Case (ASG-CL)
ASG-CL Feedback Form: Non-Substantive Comments

Non-Substantive Comments Received on CAQH CORE ASG-CL Feedback Form 1

Table 1 summarizes non-substantive comments received by ASG-CL Feedback Form respondents pertaining *to Draft CAQH CORE Attachments (275/837) Infrastructure Rule and Draft CAQH CORE Data Content Rule* along with CAQH CORE ASG-CL Co-chair and staff response, when applicable.

Table 1. Non-Substantive Comments Received on Parts A-D: Feedback Form

#	Section	Summary of Comments	CAQH CORE ASG-CL Co-chair & Staff Response
		Part A: Draft CAQH CORE Attachments (275/837) Rule Set - Scope	
1	**Scope – X12 275 Version**	Two entities commented that they support version 6020 or higher of the X12 275 transaction.	N/A
2	**Scope – X12 275 Version**	Two entities provided non-substantive comments to the Scope section. – Two entities commented that there needs to be an update for the appropriate version if the 7030/8010 version is selected.	N/A
		PART B: Draft CAQH CORE Attachments (275/837) Infrastructure Requirements	
3	**Processing Mode Requirement**	One entity commented that they plan on implementing batch processing and will accommodate real time in the future.	N/A
4	**Processing Mode Requirement**	One entity commented that for the X12 275 transaction, after an attachments final rule is published, plans will comply. They also noted that the attachment final rule from HHS may include other capabilities for electronic request and response attachments (i.e., FHIR CDex).	N/A
5	**Connectivity Requirement**	One entity noted their support for the CORE Connectivity Rule in alignment with other CAQH CORE Operating Rules.	N/A
6	**System Availability and Reporting**	One entity commented that they could post the system availability and downtime schedules in their companion guide and website.	N/A
7	**System Availability and Reporting**	Two entities provided non-substantive adjustments to the System Availability Reporting Requirements. – One entity noted that the proper term for 12:00 AM is "midnight" and that 11:59:59 PM the following Saturday could also be used. – One entity suggested rewording "unscheduled downtime" to "within one hour after downtime is realized" since the system may already be down when an unscheduled downtime occurs.	**Do not adjust.** The current language mirrors current Infrastructure Rules. CAQH CORE will update the Infrastructure Rules in 2022 and consider changes at that time.

8	**Batch Processing Mode Response Time**	Two entities provided comments on their current processing response times. – One entity commented that their current response time is: 8:00 AM – 8:00 PM MT weekdays; Friday after 8 PM- received Saturday; Anything Sent Saturday or Sunday shows up starting Monday 8AM MT. – One entity commented that they currently support X12 v5010 999, and also support the draft batch response time requirements.	**N/A**
9	**Real Time Processing Mode Response Time**	Four entities provided comments on their current and future plans for implementing and utilizing real time processing. – Three entities noted that they only support batch processing and do not plan to use real time processing. – One entity noted that they currently support X12 v5010 999 but do not support the 20 second real time response of a X12 999 if it is v5010.	**N/A**
10	**Data Error Handling – Batch**	Two entities provided comments on their current capabilities pertaining to data error handling. – One entity noted that they conduct submissions through a clearinghouse. – One entity noted that they currently support the X12 v5010 275, 999, and 824 transactions and they support the requirement for SOAP/REST and security expectations, as written.	**N/A**
11	**Front-End Server File Size**	Three entities commented on their current file size limitations. – One entity commented that their current limit is 10 MB per attachment. – One entity commented that they support the X12 v5010 275 transaction and support the requirement for 64 MB. – One entity commented that they support 95 MB ST-SE.	**N/A**
12	**Front-End Server File Size**	One entity suggested further research on file size limitations of legacy systems.	**N/A**
13	**Internal Document Management File Size**	Two entities commented on their current file size limitations. – One entity commented that their current limit is 10 MB per attachment. – One entity commented that they accept 95 MB ST-SE and their document imaging system can accept attachments larger than 64 MB.	**N/A**

14	**Internal Document Management File Size**	One entity suggested adding "…used for holding and processing attachments" to the text for added clarity and noted that if an entity has an internal document management system that is not used for attachments, the size requirement should not apply.	**Agree.** Adjust for clarity.
15	**Internal Document Management File Size**	One entity suggested further research on file size limitations of legacy systems.	**N/A**
16	**LX Loops**	Three entities provided comments explaining their support for using one or multiple LX loops. – One entity commented that using one Loop simplifies the reconciliation between the provider and plan. – One entity commented that using multiple Loops is similar to the logic of HL7 V2 type interfaces with lab results that include multiple loops/segments. – One entity commented that they prefer multiple Loops but noted that the wording is confusing, as currently written.	**N/A**
17	**LX Loops**	One entity noted that they would need to do further research on their capability for Base 64.	**N/A**
18	**Master Companion Guide**	Two entities explained their support for the Companion Guide Requirement. – One entity noted that they support consistency across companion guides. – One entity noted that they support standardized companion guides although they currently support the X12 v5010 275 transaction.	**N/A**
19	**Policy Access and Required Identification Requirements**	One entity commented that they agree with the draft requirement, but that it may be more complicated than CAQH CORE realizes to implement Policy Access and Required Identification Requirements for attachments.	**Do not adjust.** Given that the requirement received 96% support, CAQH CORE ASG-CL Co-chairs and staff recommend continuing to pursue the requirements within the subgroup.

	PART C: Draft CAQH CORE Attachments (275/837) Data Content Requirement – X12 275 Method Only		
20	**Inclusion of Draft Requirements for the X12 v6020X313 277 – Solicited Scenario**	Four entities commented that there are no 2000E/2000F loops in the X12 v5010 837 PWK segment and that the PWK segment in both the 837I and 837P are in the 2300 (claim loop) and the 2400 (loop service line level).	**Agree.** Adjust for clarity.
21	**Inclusion of Draft Requirements for the X12 v6020X313 277 – Solicited Scenario**	One entity commented that they support the X12 v5010 275 transaction, but do not support requirements for reassociation.	**N/A**

22	**Inclusion of draft requirements for the X12 v6020X313 277 – Unsolicited Scenario**	Two entities provided non-substantive comments on the unsolicited scenario for the inclusion of draft requirements for the X12 v6020X313 277.
		  – One entity suggested the subgroup wait until there has been more use of the X12 277 RFAI within the industry before drafting requirements.
		  – One entity commented that they would support developing metadata elements to assist with X12 275/277RFAI/837 reassociation and search criteria.
			N/A

23	**LOINCs on the X12 277**	Three entities provided explained why their organization does not support including LOINCs on the X12 277 RFAI.
		  – One entity commented that LOINCs can have specific regional and organizational coding schemes which would make it difficult to have uniformity across the industry.
		  – One entity commented that the industry does not have a good understanding of LOINCs and recommends that CAQH CORE revisits this topic in the future.
		  – One entity commented that they do not support this requirement at this time.
			N/A

24	**LOINCs on the X12 277**	Four entities provided non-substantive comments pertaining to the inclusion of LOINCs on the X12 277 RFAI.
		  – One entity recommended CAQH CORE build a list and/or upload codes for system implementation cross-reference.
		  – Two entities noted that LOINCs are not currently used on their platform and they do not have a lot of knowledge on this topic.
		  – One entity noted that they support this requirement if LOINCs are not a required way to specify information.
			N/A

	PART D: Draft CAQH CORE Attachments (275/278) Data Content Requirements – Non-X12 Method Only		
25	**Reassociation Requirement for the Unsolicited Non-X12 Scenario**	Three entities provided non-substantive comments to the Draft Reassociation Requirement for the unsolicited Non-X12 Scenario. – Two entities commented that they do not have the capability as the requirement is currently drafted and do not have a lot of knowledge on this topic, including how SOAP and REST factor into the requirement. – One entity commented that they support this requirement if the provider/submitter specifies the document type in the header.	- **N/A** - **Do not adjust.** The CORE Connectivity Rule allows for submitters to specify document type in the header.
26	**Reassociation Requirement for the Unsolicited Non-X12 Scenario**	One entity suggested that CAQH CORE should provide a list of minimum formats that should be support rather than a recommended list of formats that could be supported.	**Do not adjust.** Given the CORE Connectivity Rule is payload type is agnostic, the draft requirements are not limited to a list of accepted payload formats.