

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

Non-Substantive Comments Received on CAQH CORE ASG-CL Straw Poll

Table 1 summarizes non-substantive comments received by ASG-CL Straw Poll respondents pertaining to *Draft CAQH CORE Attachments (275/837) Infrastructure Rule and Draft CAQH CORE Attachments (275/837) 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-F: ASG-CL Straw Poll

#	Section	Summary of Comments	CAQH CORE ASG-CL Co-chair & Staff Response
Part A: Draft CAQH CORE Attachments (275/837) Claims Infrastructure Rule - Scope			
1	Scope	Two entities commented that they support the draft scope section, as written, and that standards are necessary for electronic communication between provider and payer.	N/A
PARTS B & C: Draft CAQH CORE Attachments (275/837) Infrastructure Requirements (X12 & Non-X12 Methods)			
2	Processing Mode Requirement (X12 Method)	One entity explained that their organization attempted to add claim attachments to their functionality but found that clearinghouses do not accept X12 v6020 nor the 275 transaction.	N/A
3	Processing Mode Requirement (X12 Method)	One entity noted that they have not yet implemented the X12 275 transaction.	N/A
4	Connectivity Requirement (X12 & Non-X12 Method)	Three entities provided their support for the draft requirement, as written. <ul style="list-style-type: none"> - One of these noted they are open to the flexibility listed. - Another said their organization’s HL7 team uses REST. - Another stated that this functionality is supported via the portal. 	N/A
5	System Availability and Reporting (X12 Method)	One entity noted the reference to the X12 275 transaction in Line 108 requires additional clarification. It currently states, ‘X314 275 Additional Information’.	Agree. Adjust for Clarity.
6	System Availability and Reporting (X12 & Non-X12 Method)	Four entities commented on the system availability requirements for both the X12 and Non-X12 Methods: <ul style="list-style-type: none"> - One of these noted they do not support anything lower than 95% availability. 	Do not adjust. The current language mirrors current Infrastructure Rules. CAQH CORE will update the

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		<ul style="list-style-type: none"> - Another commented that they would like to see system availability greater than 86% per calendar week. - Another explained that evenings are fine, but their organization does not process on weekends, especially Sundays. - Another noted that 14% scheduled and unscheduled downtime see appropriate. 	Infrastructure Rules in late 2021/2022 and consider changes at that time.
7	System Availability and Reporting (Non-X12 Method)	One entity explained that non-EDI exchanges should be held to a higher system availability requirement of at least 95%.	N/A
8	Real Time Processing Mode Response Time (X12 Method)	One entity commented that real time response may discourage payers from adopting or severely limit file sizes to ensure they meet the 20 seconds round trip response time.	N/A
9	Data Error Handling – Batch (X12 Method)	Two entities explained their organization’s current data error handling process: <ul style="list-style-type: none"> - One explained that they send a ‘happy 999’ to confirm that an attachment was received. For errors, their organization sends an X12 v6020 824. - Another said their organization plans on using the X12 v6020 824. 	N/A
10	Data Error Handling – Batch (X12 Method)	One entity recommended revising Line 209 to clearly state that sending an X12 824 is based on the receiver’s capability.	Do not adjust. The draft requirement includes language indicating that the X12 824 response is not required by the receiver.
11	Front-End Server File Size (X12 Method)	Two entities further explained their organization’s vote for the minimum file size requirement: <ul style="list-style-type: none"> - One noted that their organization plans on accepting 95MB per ST-SE (includes all attachments/LX loops). - Another explained they would like to see file sizes greater than a minimum of 64MB supported. 	N/A
12	Front-End Server File Size (Non-X12 Method)	One entity stated they would like to see file sizes great than 64MB supported using the Non-X12 Method.	N/A
13	Internal Document Management File Size (X12 Method)	Two entities noted that the minimum file size could be increased when using the X12 Method:	N/A

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		<ul style="list-style-type: none"> - One of these said their organization supports more than 64MB. - Another stated they would like to see file sizes greater than 64MB supported. 	
14	Internal Document Management File Size (Non-X12 Method)	<p>Two entities provided further information on their support for the file size minimum using the Non-X12 Method:</p> <ul style="list-style-type: none"> - One of these explained their organization supports 32MB per attachments and up to 6 attachments are allowed in a file so 192MB is the maximum allowed per file. - Another stated they would like to see file sizes great than 64MB supported. 	N/A
15	Use of Multiple LX Loops (X12 Method)	<p>Three entities commented on the use of multiple LX Loops:</p> <ul style="list-style-type: none"> - One of these said their organization plans to limit it to 10 LX loops per ST-SE for the X12 v6020 275. - Another said there would be no more than 10 loop occurrences. - Another noted that payers setting a maximum size for attachments, whether for each attachment or for the combination of multiple attachments in one X12 275, is not included in the draft requirement, which could be beneficial. 	N/A
16	Master Companion Guide (X12 Method)	<p>One entity stated that their organization plans on using their template format to obtain all requirements for provider documentation and then will transfer its Companion Guide to the CORE Companion Guide Template.</p>	N/A
17	Electronic Policy Access Requirement (X12 Method & Non-X12 Method)	<p>One entity explained that they post this information on their website for providers.</p>	N/A
18	Electronic Policy Access Requirement (X12 Method)	<p>One entity recommended adding language the following language to the draft section: ‘To support patient care, such information should be accurate and current and should clearly communicate to providers what supporting documentation is needed.’</p>	Agree. Adjust for clarity.
19	Electronic Policy Access Requirement (X12 Method)	<p>One entity noted that there was no closing parenthetical on Line 267.</p>	Agree. Adjust for clarity.

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Part D: Draft CAQH CORE Attachments (275/837) Claims Data Content Rule - Scope			
20	Scope	Two entities commented on the transaction versions included in the draft rule. <ul style="list-style-type: none"> - One of these said they mirror current requirements. - Another said that they do not support using v6020 for the X12 999, 824 or 277. They noted that v7030 is supported by their organization. 	N/A
21	Scope	One entity noted that on line 19 the name of the X12 275 should be 'Additional Information to Support a Health Care Claim or Encounter' rather than 'Additional Information'.	Agree. Adjust for clarity.
PARTS E & F: Draft CAQH CORE Attachments (275/837) Data Content Requirements (X12 & Non-X12 Methods)			
22	LOINCs on the X12 277 (X12 Method)	One entity noted that Footnote 5 on line 97 seems out of place.	Agree. Adjust for clarity. CAQH CORE staff will move Footnote 5 to Section 4.1 of the draft rule.
23	LOINCs on the X12 277 (X12 Method)	One entity noted that the straw poll survey question used the word 'required' when describing a health plan's use of LOINCs to request the most specific additional information needed to support the adjudication of an X12 837 claim submission, while the draft rule language states that health plans 'should' use the appropriate LOINCs.'	Agree the use of 'required' in the straw poll's summarized language contradicts the rule language. The draft rule language 'should' is accurate.
24	LOINCs on the X12 277 (X12 Method)	Two entities provided additional information about LOINC implementation in their organizations. <ul style="list-style-type: none"> - One noted that their organization will implement the X12 277 RFAI in 2022. - Another noted that the inclusion and ability to process LOINCs is not built into many of the health plan systems and will represent a significant build. 	N/A
25	LOINCs on the X12 277 (X12 Method)	One entity commented that the LOINCs allowed in the X12 277 RFAI are listed in the LOINC Relma tool on the HIPAA tab for Request LOINCs.	N/A

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26	Common Reference Data for Reassociation (X12 Method)	Two entities provided comments on the draft rule language and list of common reference data. <ul style="list-style-type: none"> - One entity noted that the draft language is in alignment with other X12 requirements. - Another noted that date of service is not always available. 	<ul style="list-style-type: none"> - N/A - The data elements should only be included by the provider <i>if available</i>. They are not required by the health plan.
27	Use of PWK02 Code EL (X12 Method)	Two entities recommended adjustments for clarity. <ul style="list-style-type: none"> - One entity noted that the referenced Loop should be Loop 2400 rather than Loop 2400.1. - Another suggested that '<i>solicited</i>' should be included in the introductory section language. 	Agree. Adjust for clarity. CAQH CORE staff will adjust this section for clarity in accordance with the recommenders' comments.
28	Use of PWK02 Code EL (X12 Method)	Two entities provided explanation for their support/non-support of this section. <ul style="list-style-type: none"> - One stated that this requirement is in alignment with current PWK segment use. - Another said they do not support the 6020 standard, only the 7030 standard. 	N/A
29	Connectivity Headers for Reassociation (Non-X12 Method)	One entity stated that the draft requirement is in alignment with what is needed.	N/A
30	Data Elements for Reassociation (Non-X12 Method)	One entity stated that their organization supports the requirement.	N/A
31	Data Elements for Reassociation (Non-X12 Method)	One entity questioned if a web upload allows only one attachment at a time, how the provider would include the data elements as part of the payload.	N/A
Appendix – X12 TR3 Data Element and Reference Identification Mapping			
32	Appendix	Two entities commented that the list of data elements was appropriate and in alignment with other X12 requirements.	N/A