



CAQH CORE Advanced Explanation of Benefits (EOB) Advisory Group

Call #1

Call Doc #1

August 19, 2021

Agenda

Time	Agenda Item	Discussion Item or Action Required
2:02	1. Antitrust Guidelines	<i>Discussion</i>
2:05	2. Roll Call and Administrative Items <ul style="list-style-type: none"> • Roll call • Focus of today's call: <ul style="list-style-type: none"> – Level set – Background – Discussion on Good Faith Estimate Exchange Methods – Next Steps 	<i>Discussion</i>
2:10	3. CAQH CORE Level Set <ul style="list-style-type: none"> • Advisory Group Goals and Scope • CAQH CORE Rule Development Process • Advisory Group Roadmap • Advisory Group Participant Expectations 	<i>Discussion</i>
2:15	4. Background on No Surprises Act <ul style="list-style-type: none"> • No Surprises Act: Policy Overview • Review of Good Faith Estimate and Advanced EOB Requirements • Industry Collaboration and Interest 	<i>Discussion</i>
2:25	5. Discussion on Methods of Good Faith Estimate Data Exchange <ul style="list-style-type: none"> • Good Faith Estimate Scope and Goals • Connectivity and Security Methods • Leveraging the X12 Standards • Indicator and Data Elements 	<i>Discussion</i>
2:55	6. Next Steps <ul style="list-style-type: none"> • CAQH CORE Advanced EOB Advisory Group Co-Chairs & Staff: <ul style="list-style-type: none"> – Distribute Advisory Group Straw Poll #1 to participants by Monday, 08/23/21, end of day. – Draft a call summary for today's Advisory Group call. – Analyze results of Advisory Group Straw Poll #1 in preparation for Call #2 on Wednesday, September 8, 2021. • Advanced EOB Advisory Group Participating Organizations: <ul style="list-style-type: none"> – Complete Straw Poll #1 by Friday, 08/27/21, end of day. – Participate in the next CAQH CORE Advanced EOB Advisory Call on Wednesday, 09/08/21 from 2:00 - 3:30 PM ET. 	<u>Action Required</u> Agree to next steps.

CAQH CORE Participant Dashboard

The **CAQH CORE Participant Dashboard** was created to serve as a comprehensive resource for CAQH CORE Participants to access work group information and any Participant-specific resources and events.

The screenshot shows the CAQH CORE Participant Dashboard interface. On the left is a purple sidebar with the CAQH CORE logo and navigation links: All Work Groups, Advanced EOB Advisory Group (AEOB AG), Overview, Calendar, Announcements, Documents, Group Members, Global Calendar, and Log out. The main content area has tabs for Overview, Calendar, Announcements, and Documents. Under the Overview tab, there is a section for 'Upcoming Events' with a 'Calendar View' link. A calendar icon shows the date 19 AUG. Below this, a list of events is displayed:

23 - 28 Aug 2021	Event Title: AEOB AG Straw Poll #1
08 Sep 2021	Event Title: AEOB AG Call #2
15 - 21 Sep 2021	Event Title: AEOB AG Straw Poll #2

- The [dashboard](#) is accessible only to CAQH CORE Participants.
- Participants can view the work groups they are currently involved in and add themselves to new groups.
- Participants can view upcoming events, documents, announcements, and group member information.
- Email core@caqh.org if you need a login.

CAQH
CORE

CAQH CORE Level Set

Broad Interest in Advanced EOB

Strong Advisory Group Representation Across Stakeholders



CAQH CORE Operating Rule Overview

Published Rules to Date

Rule Set	Infrastructure	Connectivity Rule Application	Data Content	Other
Eligibility & Benefits	Eligibility (270/271) Infrastructure Rule	Connectivity Rule vC1.0.0 Connectivity Rule vC2.0.0	Eligibility (270/271) Data Content Rule	Single Patient Attribution Data Rule
Claim Status	Claim Status (276/277) Infrastructure Rule	Connectivity Rule vC2.0.0		
Payment & Remittance	Claim Payment/ Advice (835) Infrastructure Rule		EFT/ERA 835/CCD+ Data Content Rule	EFT/ERA Enrollment Data Rules
Prior Authorization & Referrals	Prior Authorization (278) Infrastructure Rule	Connectivity Rule vC3.0.0	Prior Authorization (278) Data Content Rule	Prior Auth Web Portal Rule
Health Care Claims	Health Care Claim (837) Infrastructure Rule			
Benefit Enrollment	Benefit Enrollment (834) Infrastructure Rule			
Premium Payment	Premium Payment (820) Infrastructure Rule			
Attributed Patient Roster	Attributed Patient Roster (834) Infrastructure Rule	Connectivity Rule vC4.0.0*	Attributed Patient Roster (834) Data Content Rule	

Rules in purple boxes are federally mandated.

*Connectivity Rule vC4.0.0 can be used to support all rule sets for CORE Certification.

CAQH CORE Operating Rule Development Process

Identify Opportunities

Advisory Groups

e.g., Attachments Advisory Group.

Advisory Groups research opportunities for potential rules and may provide industry guidance, prior to a Subgroup commencing rule writing.

Draft Rules

Subgroups

e.g., Attachments Subgroup

Subgroups develop and straw poll draft Operating Rules for review by assigned Work Groups.

Work Groups vote on draft rules developed by assigned Subgroup(s).

Review Work Group

Ballot Participants

CAQH CORE Participants

Full CAQH CORE Voting Membership vote requires for a quorum that 60% of all Full CORE Voting Member organizations (i.e., CAQH CORE Participants that create, transmit, or use transactions) vote on the proposed rule at this stage **with a 66.67% approval vote.**

CAQH CORE Board

Once CAQH CORE Participants have reached quorum, the **CAQH CORE Board will vote for final approval.**


Task Groups


Task Groups convene to update/maintain existing Operating Rules.


e.g., CAQH CORE Code Combinations Task Group

CAQH Advanced EOB Advisory Group


Goals and Scope

 **Goal: Publish a guidance document** illustrating how industry can meet Advanced EOB requirements leveraging uniform frameworks and industry standards, with a focus on the exchange of Good Faith Estimates.

 **Scope:** The initial scope of work will aim to help organizations demonstrate a good faith effort to meet Advanced EOB requirements by January 01, 2022, by providing guidance on **how industry should implement connectivity protocols, messaging standards, and related data content to support provider to payer exchanges of Good Faith Estimates.**

 **Additional use cases** for Advanced EOB requirements may be considered by the Advisory Group in the **future:**

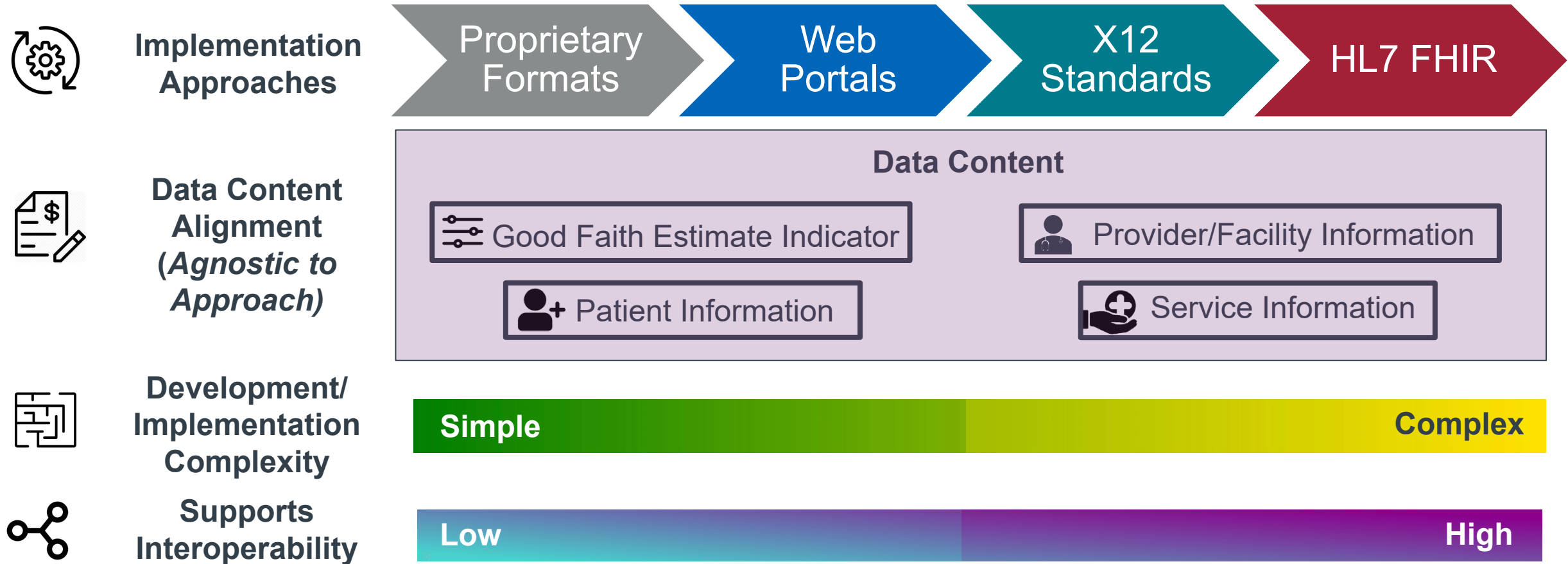
- Provider/Payer Aggregation of Service Estimates
- Plan to Member Advanced EOB Exchange
- Plan to Provider Advanced EOB Exchange
- Comprehensive Advanced EOB Data Set

 With further vetting via the CAQH CORE rule development process, **recommendations from the guidance document could be developed into operating rules in the future.**

CAQH Advanced EOB Advisory Group

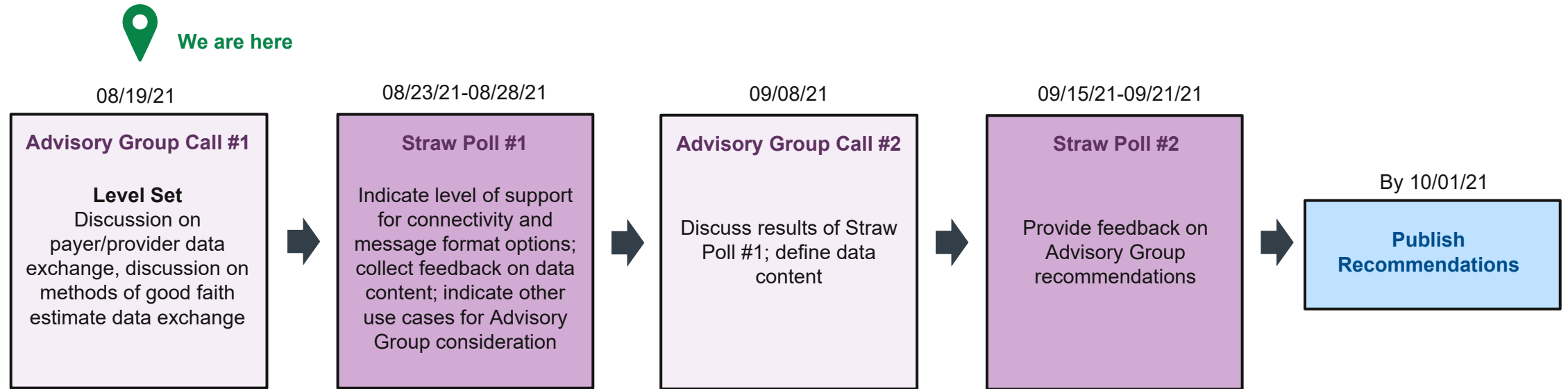
Implementation Approaches

Today, there are a variety of approaches the industry could implement to support Advanced EOB requirements. CAQH CORE is seeking to coalesce the industry towards a common approach to promote uniform implementations and to support interoperability.



CAQH CORE Advanced EOB Advisory Group Roadmap

Overall Timeline



**Timeline may be subject to adjustments based on Advisory Group needs.*

CAQH CORE Advanced EOB Advisory Group Participants

Expectations & Responsibilities



- **Become familiar with the No Surprises Act, Good Faith Estimates, Advanced EOBs, and including:**
 - H.R. 133 – Consolidated Appropriations Act; Division BB – Private Health Insurance and Public Health Provisions, especially the No Surprises Act; CMS Hospital Price Transparency Rule; CMS Transparency in Coverage Rule.
 - Industry efforts focused on Advanced EOB/price transparency.



- **Attend and actively participate in calls.**
 - Read materials ahead of time whenever possible.
 - CAQH CORE staff will draft call documents and ensure they are made available on the CAQH CORE Participant Dashboard.
 - Call summaries are created after each call and approved by the participants.



- **Work with your organization's subject matter experts (SMEs), as appropriate. SMEs should have:**
 - Knowledge of their organization's business processes with respect to the implementation of Good Faith Estimates, Advanced EOBs, and/or be a price transparency expert.



- **Provide regular updates on Advisory Group's progress to Executive Sponsors.**
 - SMEs should regularly update their Executive Sponsors on the Advisory Group's progress.
- **Participate in Straw Polls.**

Background: No Surprises Act

CAQH CORE Advanced EOB Advisory Group Background

No Surprises Act, Advanced EOB, & Good Faith Estimate



- The **No Surprises Act**, signed into law as part of the Consolidated Appropriations Act of 2021, addresses surprise medical billing at the federal level.



- Section 111 of the Act requires health plans to provide an **Advanced EOB** for scheduled services one to three business days in advance, dependent on date of intended service/item, to give patients transparency into which providers are expected to provide treatment, the expected cost, and the network status of providers.



- Section 112 requires health care providers and facilities to verify what type of coverage the patient is enrolled in and provide notification of a **good faith estimate** of charges to the payer/patient at least three days in advance of service/item and no later than one day after scheduling the service.



- Mandate compliance begins January 1, 2022*.

*An [Interim Final Rule](#) has been issued focusing on implementing provisions of the No Surprises Act. The rule does not directly address Advanced EOBs, noting that additional rulemaking and guidance will be issued in the near future. However, per the rule, stakeholders are expected to implement the requirements using a good faith, reasonable interpretation of the statute by 01/01/22.

CAQH CORE Advanced EOB Advisory Group Background

Advanced EOB & Good Faith Estimate Requirements

- **The Advanced EOB must be shared with the member/patient by mail or electronically, depending on the individual's preference, and include the following information:**
 - If a provider/facility is in- or out-of-network with respect to the item/service.
 - If the provider/facility is in-network, the contracted rate based on billing and diagnostic costs sent by the provider.
 - If the provider/facility is out-of-network, a description on how the individual can find contracted providers/facilities, if any.
 - A Good Faith Estimate of expected charges based on billing and diagnostic codes.
 - A Good Faith Estimate of the plan's payment responsibility and member's cost sharing responsibilities for the item/service.
 - A Good Faith Estimate of the amount the member has incurred toward meeting their financial responsibility limit (including deductibles and out-of-pocket maximums) under the plan.
 - Disclaimers that the coverage is subject to medical management requirements and that the estimates are subject to change.
 - Any other information health plans deem appropriate to include consistent with other requirements.



CAQH CORE Advanced EOB Advisory Group Background

Industry Collaboration and Interest



CAQH CORE is collaborating with and complementing the efforts of industry initiatives working on various aspects of the No Surprises Act.

CAQH CORE

The CAQH CORE Advanced EOB Advisory Group will develop initial guidance on how the industry can best demonstrate a good faith effort to meet the Advanced EOB requirements, with a focus of Good Faith Estimate exchanges between providers to payers.

Da Vinci Project

Da Vinci is working to define standard FHIR-based methodology (data input, data output, and format) to support real-time requests and responses for patient cost; ability to communicate good faith estimates for single service, collection of services, and items; and ability to communicate cost estimates in advance of scheduled service upon request. Targeting ballot in January 2022.

WEDI

WEDI is focused on understanding business challenges with the No Surprises Act and providing feedback to HHS, CMS, and other agencies.

CARIN Alliance

CARIN is developing a consumer payer data set and corresponding implementation guide for the set of HL7 FHIR Resources that payers can display to consumers via a FHIR API.

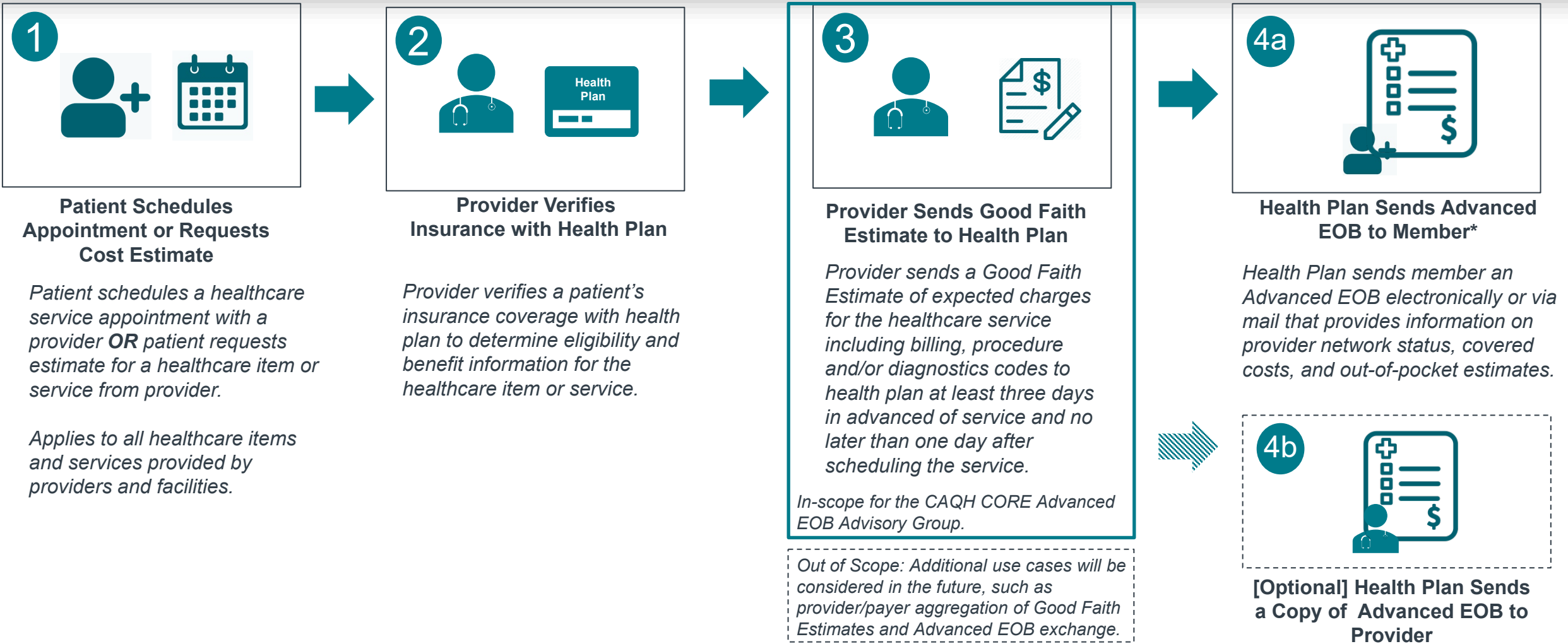
NCVHS

NCVHS is currently looking at issues of industry standardization to achieve efficiency, simplicity, and burden reduction in the U.S. health care system in their Convergence 2.0 initiative.

Discussion on Good Faith Estimate Exchange Methods

Advanced EOB Workflow

Scope for Advisory Group



*Advanced EOB's must be issued within one business day after receiving Good Faith Estimate for services scheduled three to nine days before intended service date.
 *Advanced EOB's must be issued within three business days after receiving Good Faith Estimate for serviced scheduled more than 10 days from intended service date.

Industry Guidance on Good Faith Estimate Exchanges

Goal for Advisory Group

Goal: Publish a guidance document illustrating how industry can support Advanced EOB requirements by January 1, 2022, with an initial focus on the exchange of Good Faith Estimates between providers and payers.

Industry Guidance: Good Faith Estimate Exchanges

Connectivity & Security

Align on a common framework to promote uniform, secure, and interoperable approaches for exchanging Good Faith Estimates.

Messaging Standards

Build consensus on which messaging standards should be leveraged for building and sending Good Faith Estimates from provider to payer.

Data Content






Identify necessary data elements that may be required to be sent on a Good Faith Estimate so a health plan may generate an Advanced EOB.

CAQH CORE Participants will continue to advance and build on the progress the CAQH CORE Advanced EOB Advisory Group at regular intervals over time to align with policy updates, industry initiatives, and participating organization priorities.

Good Faith Estimate Data Exchange Methods

Connectivity & Security Approaches

The **CAQH CORE Connectivity Rule vC4.0.0** is positioned to support the exchange of Good Faith Estimates between providers and payers:

-  Addresses **connectivity and security of administrative and clinical data exchange** and **establishes a national base guiding healthcare communication.**
-  Aligns to support frameworks outlined in the **CMS and ONC Interoperability Rules for modernized connectivity and security requirements.**
-  Using the Internet as a delivery option establishes a **Safe Harbor connectivity method** that application vendors, providers, and health plans can be assured will be supported by any HIPAA covered entity, meaning that the entity is capable and ready to exchange data at the time of a request by a trading partner using the CAQH CORE Connectivity Rule.
-  **Payload agnostic** as supports the exchange of X12 and non-X12 data over **SOAP Web Services** and **REST API's.**
-  Ensures **secure transmission of information** by requiring the use of TLS 1.2 or higher for encryption, X.509 Digital Certificates for authentication, and OAuth 2.0 of authorization.

Good Faith Estimate Data Exchange Methods

Leveraging the X12 Standards

The X12 Claim (837) Transaction(s) have the capacity to facilitate the exchange of Good Faith Estimates between Providers and Health Plans.

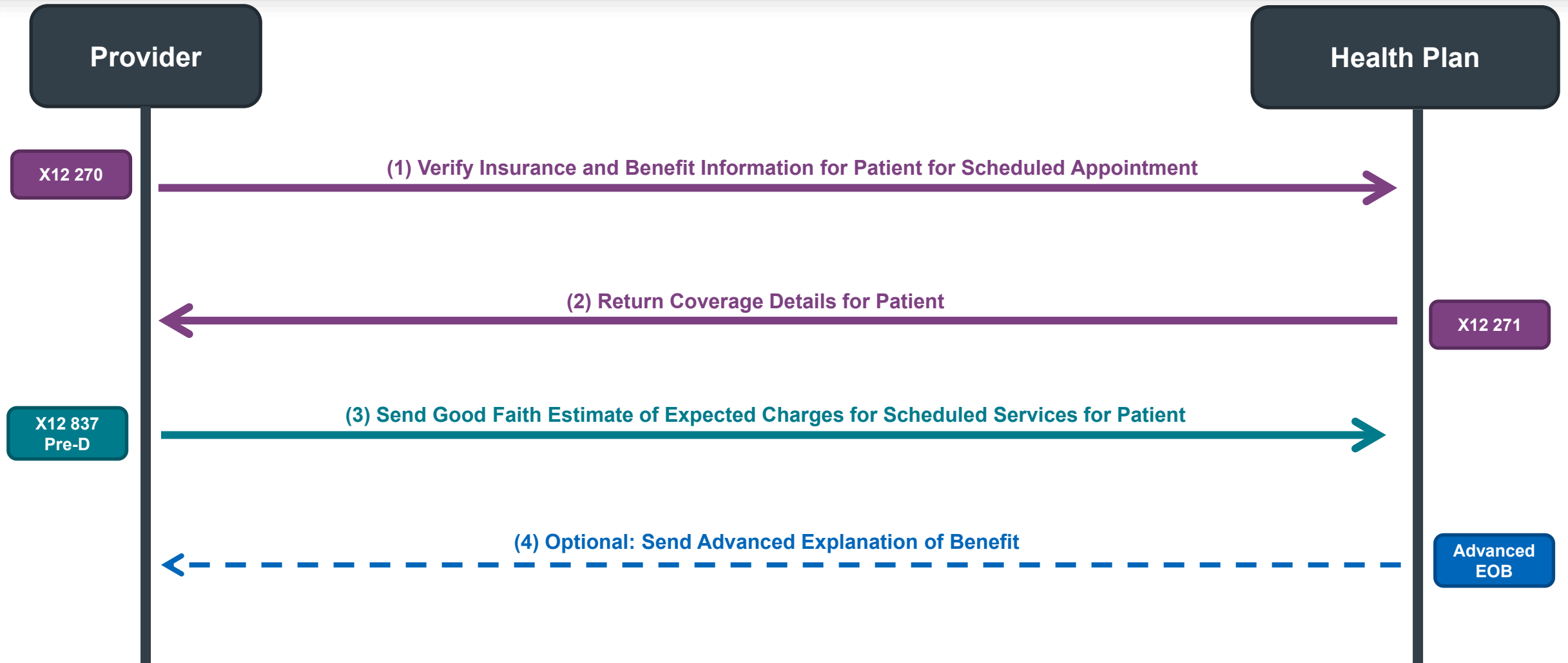
- A predetermination claim could be submitted by a provider to a health plan, outlining the scheduled service with associated billing, procedure, and/or diagnostic codes and associated charges.
- The health plan could then review, process and adjudicate the pre-determination claim to generate an Advanced EOB.

X12 Claim (837) Transaction	HIPAA-mandated	Pre-determination Support
X12 837 Institutional 005010X223	✓	
X12 837 Institutional – Pre-Determination 005010X292		✓
X12 837 Professional 005010X222	✓	
X12 837 Professional – Pre-Determination 005010X291		✓
X12 837 Dental 005010X224	✓	✓

Additionally, the Da Vinci Patient Cost Transparency Use Case is working to define a standard FHIR-based methodology to support real-time requests and responses for patient cost. Da Vinci is evaluating a hybrid X12 and HL7 FHIR model for Advanced EOBs, leveraging the X12 837 Pre-Determination transaction sets.

Good Faith Estimate Data Exchange Methods

Potential Workflow for Provider to Payer Interactions



Note: All exchanges can occur via CAQH CORE Connectivity Rule vC4.0.0

Good Faith Estimate Data Exchange Methods

Uniform Data Content Opportunities for Good Faith Estimate

Indicator

Specify how to notify a health plan that the claim transaction is for a Good Faith Estimate vs a Billable Claim for Payment.

Patient Information

Define patient demographics data needed for a health plan to identify and match member who is receiving scheduled service or has requested an estimate via Good Faith Estimate. (e.g., First Name; Last Name; Member ID; Date of Birth; Subscriber/Dependent)

Provider/Facility Information

Identify provider or facility demographics data needed for a health plan to determine who will be providing the scheduled service via Good Faith Estimate. (e.g., Provider/Facility Name; NPI; Place of Service; Service Location; Provider Taxonomy)

Service Information

Catalog data elements needed to attribute a scheduled service as indicated by Good Faith Estimate. (e.g., Procedure Codes, Diagnosis Codes, and Modifiers; Date of Scheduled Service; Unit Accumulators; Charge Amount.

Advisory Group Next Steps

CAQH CORE Advanced EOB Advisory Group Straw Poll #1

Instructions, Guidelines, and Due Date



Objectives: Collect each Participating Organization's feedback on methods of exchanging Good Faith Estimates. Feedback received will help to inform a guidance document illustrating how industry can meet Advanced EOB requirements, with a focus on Good Faith Estimates.

Advisory Group Straw Poll #1 Format

- ❑ (1) Collect feedback on connectivity methods to facilitate a Good Faith Estimate exchange.
- ❑ (2) Collect feedback on messaging standards that could be used to send Good Faith Estimates.
- ❑ (3) Collect feedback on scope of uniform data content that should be delivered as part of the Good Faith Estimate.
- ❑ (4) Indicate and prioritize other use cases for Advisory Group consideration.

Additional Guidance

- Straw Poll #1 responses are due **via the online submission form by Friday, 08/27/21, end of day.**
- The form is to be completed by CAQH CORE Advisory Group Participants only; **please coordinate to submit one response for your organization.**
- Respondents may choose to abstain from responding to a given question, if they desire.
- In accordance with CAQH CORE policy, all responses will be kept strictly confidential.
- Questions should be directed to Kaitlin Powers, CORE Associate, at kpowers@caqh.org.

CAQH CORE Advanced EOB Advisory Group

Next Steps



CAQH CORE Advanced EOB Advisory Group Participants

- Complete Straw Poll #1 by **Friday, 08/27/21.**
- Participate in the next Advisory Group Call on **Wednesday, 09/08/21 at 2:00 PM ET.**



CAQH CORE Staff

- Draft a summary for today's call.
- Send Straw Poll #1 to Advisory Group Participants by **Monday, 08/23/21.**
- Analyze Straw Poll #1 feedback and prepare results for **Wednesday, 09/08/21** call.

Contact CORE@caqh.org with any questions.

CAQH CORE

Appendix

Today's Call Documents

Document Name
Doc 1: AEOB AG Call 1 Deck 08.19.21

CORE Staff	Email Address
Erin Weber, <i>Director, CORE</i>	eweber@caqh.org
Bob Bowman, <i>Director, CORE</i>	rbowman@caqh.org
Taha Anjarwalla, <i>Associate Director, CORE</i>	tanjarwalla@caqh.org
Emily TenEyck, <i>Manager, CORE</i>	eteneyck@caqh.org
Kaitlin Powers, <i>Associate, CORE</i>	kpowers@caqh.org

CAQH CORE Advanced EOB Advisory Group

Activity Schedule

Date	Advanced EOB Advisory Group Activity
Thursday, August 19, 2021 Time: 2:00-3:00 pm ET	Advisory Group Call #1 <ul style="list-style-type: none">• Level-Set.• Review of No Surprises Act• Discussion on Good Faith Estimate Exchanges.
August 23-27, 2021	Advisory Group Straw Poll #1 <ul style="list-style-type: none">• Collect feedback on connectivity, messaging standards, and uniform data content.• Indicate and prioritize other use cases for Advisory Group consideration.
Wednesday, September 8, 2021 Time: 2:00 – 3:30 pm ET	Advisory Group Call #2 <ul style="list-style-type: none">• Discuss results of Straw Poll #1.• Define data content.
September 15-21, 2021	Advisory Group Straw Poll #2 <ul style="list-style-type: none">• Provide feedback on Advisory Group recommendations.
By October 1, 2021	Publish Recommendations

CAQH CORE Advanced EOB Advisory Group

Roster

Full Name	Organization
Heather Morgan	Aetna
Amy Neves	Aetna
Kellene Parthemore	Aetna
Merri-Lee Stine	Aetna
Terrence Cunningham	American Hospital Association (AHA)
Heather McComas	American Medical Association (AMA)
Molly Reese	American Medical Association (AMA)
Jen Abernathy	Anthem Inc.
Meg Kutz	Anthem Inc.
Scott Munich	Anthem Inc.
Michelle Barry	ASC X12
Tasaduk Aziz	athenahealth
Julie Rezendes	athenahealth
Vijayaganesh Sampathkumar	athenahealth
Krisi Hutson	Availity, LLC
Tom Mort	Availity, LLC
Thomas Mort	Availity, LLC
Sam Undine	Blue Cross Blue Shield Association
Ann McNeilly	Blue Cross Blue Shield of Michigan
Cindy Monarch	Blue Cross Blue Shield of Michigan
Susan Langford	Blue Cross Blue Shield of Tennessee
Brian Poteet	Blue Cross Blue Shield of Tennessee
Lorraine Doo	Centers for Medicare and Medicaid Services (CMS)
Mike Denison	Change Healthcare
Deb McCachern	Change Healthcare
Megan Soccorso	CIGNA
Shari Kosko	CMS
Nicholas Dahl	Cognizant
Hardik Patel	Cognizant

Full Name	Organization
Sree Kamakshi Devi Rachamadugu	Cognizant
Dawn Sprague	Cognizant
Bettina Vanover	Cognizant
Cristina Boincean	Edifecs
Alex Lucyk	Epic
Roger Johnson	Experian
Dan Wiens	Experian
Katherine Kilrain	Harvard Pilgrim Health Care
Parag Desai	Healthedge Software Inc
Douglas Hanna	Healthedge Software Inc
Maria Gonzalez	Kaiser Permanente
Melanie Combs-Dyer	Mettle Solutions
Drew Voytal	MGMA
Dennis Zanetti	NantHealth
Tonia Bateman	New Mexico Cancer Center
Sue Schlichtig	NextGen Healthcare Information Systems, Inc.
Nancy Team	NextGen Healthcare Information Systems, Inc.
Randy Gabel	Ohio Health
Bill Campbell	OneHealthPort
Linda Michaelson	OptumInsight
Tara Rose	OptumInsight
John Balose	PaySpan
Robert Pinataro	PaySpan
David Mistkawi	The SSI Group, Inc.
Dawn Duchek	TriZetto Corporation, A Cognizant Company
A J Johnson	TriZetto Corporation, A Cognizant Company
LiLi Liu	Tufts Health Plan
Nicole Waickman	Tufts Health Plan
Jay Eisenstock	WEDI
Robert Tennant	Work Group for Electronic Data Interchange (WEDI)