



CAQH CORE Review Work Group (RWG)

Call #2

September 23, 2021

2:00-3:30 pm ET

Agenda

Time*	Agenda Item	Discussion Item or Action Required
2:00 PM	1. Antitrust Guidelines	<i>Discussion</i>
2:02 PM	2. Roll Call and Administrative Items	<i>Discussion</i>
2:05 PM	3. Summary of 8/26/21 RWG Call <ul style="list-style-type: none"> Reviewed CAQH CORE Attachments Initiative and RWG Scope/Schedule. Reviewed Draft CAQH CORE Attachments Operating Rules Sets. Agreed to Next Steps. 	<u>Action Required:</u> <ul style="list-style-type: none"> Approve 08/26/21 Call Summary
2:10 PM	4. RWG Timeline Level Set	<i>Discussion</i>
2:15 PM	5. Review Results of Straw Poll including: <ul style="list-style-type: none"> Respondent Breakdown and Percent Support for Draft Requirements & Certification Test Scenarios. Comments Received on Draft Attachments 275/278 PA Rules & Certification Test Scenarios. Comments Received on Draft Attachments 275/837 Claims Rules & Certification Test Scenarios. Agree to adjustments, as necessary. 	<i>Discussion</i>
3:00 PM	6. Review Draft Updates to the CAQH CORE Eligibility & Benefits Data Content Rule	<i>Discussion</i>
3:20 PM	7. RWG Next Steps <ul style="list-style-type: none"> CAQH CORE Review Work Group: <ul style="list-style-type: none"> Participate in the next RWG Call: <u>Thursday, 10/21/21 at 2:00 PM ET.</u> Complete RWG Straw Poll #2 <u>by end of day Friday, 10/22/21.</u> CAQH CORE Co-chair & staff: <ul style="list-style-type: none"> Draft a summary for today's call. Send RWG Straw Poll #2 by, <u>Friday, 10/08/21.</u> 	<u>Action Required:</u> <ul style="list-style-type: none"> Agree to Next Steps

*EDT

Review Work Group Call #1 Summary

Motion to Approve

CAQH Committee on Operating Rules for Information Exchange (CORE)
Review Work Group (RWG)
Call #1 Summary: Thursday, August 26th, 2021, 2:00-3:30 pm ET Conference Call

This document contains:

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

Agenda Item	Key Discussion Points	Decisions and Actions
1. Antitrust Guidelines	<ul style="list-style-type: none">• Bob Bowman (CAQH CORE Director) opened the call and reviewed the Antitrust Guidelines, noting that they are published on the CAQH CORE Participant Dashboard along with the meeting materials.	<i>Discussion</i>
2. Roll Call and Administrative Items (Doc #1; Slides 2-4)	<ul style="list-style-type: none">• Bob Bowman (CAQH CORE Director) reviewed the focus of the call, which was to:<ul style="list-style-type: none">◦ Review the Review Work Group (RWG) Scope.◦ Review the Draft CAQH CORE Attachments Operating Rules.◦ Review the Draft updates to CAQH CORE Eligibility & Benefits Data Content Rule.◦ Discuss Next Steps.• Bob Bowman (CAQH CORE Director) reviewed the call documents:<ul style="list-style-type: none">◦ Doc #1: RWG Call 1 Slide Deck 08.26.21• Marianna Singh (CAQH CORE Senior Associate) facilitated roll call. [See call participant roster at the end of this meeting summary to view call attendees and affiliated organizations].• Donna Campbell (HCSC), Mahesh Siddanti (Centene) and Molly Reese (AMA) introduced themselves as RWG Co-chairs.	<i>Discussion</i>
3. Level Set (Doc #1; Slides 5 - 10)	<ul style="list-style-type: none">• Emily TenEyck (CAQH CORE Manager) provided a Level Set for the work group including details on the work group timeline.• Summary of RWG Discussion:<ul style="list-style-type: none">◦ No questions or comments were raised by the RWG participants.	<i>Discussion</i>
4. Overview of CAQH CORE RWG Scope (Doc #1; Slides 11 - 12)	<ul style="list-style-type: none">• Emily TenEyck (CAQH CORE Manager) reviewed the scope of work group including details around which rules the work group would be reviewing and providing input.• Summary of RWG Discussion:<ul style="list-style-type: none">◦ No questions or comments were raised by the RWG participants.	<i>Discussion</i>

CAQH CORE Participant Dashboard

The **CAQH CORE Participant Dashboard** serves as a comprehensive resource for CAQH CORE Participants to access work group information and any CAQH CORE Participant resources and events.

The screenshot displays the CAQH CORE Participant Dashboard interface. On the left is a purple sidebar with the CAQH CORE logo and a navigation menu. The main content area is titled 'Review Work Group (RWG)' and features a navigation bar with 'Overview', 'Calendar', 'Announcements', and 'Documents'. Below this is a section for 'Upcoming Events' with a 'Calendar View' link. A calendar event is shown for August 26th, titled 'RWG Call #1' with a time of 2:00 pm - 3:30 pm.

CAQH CORE

All Work Groups

Review Work Group (RWG)

Overview

Calendar

Announcements

Documents

Group Members

Global Calendar

Log out

Review Work Group (RWG)

Overview Calendar Announcements Documents

Upcoming Events [Calendar View](#)

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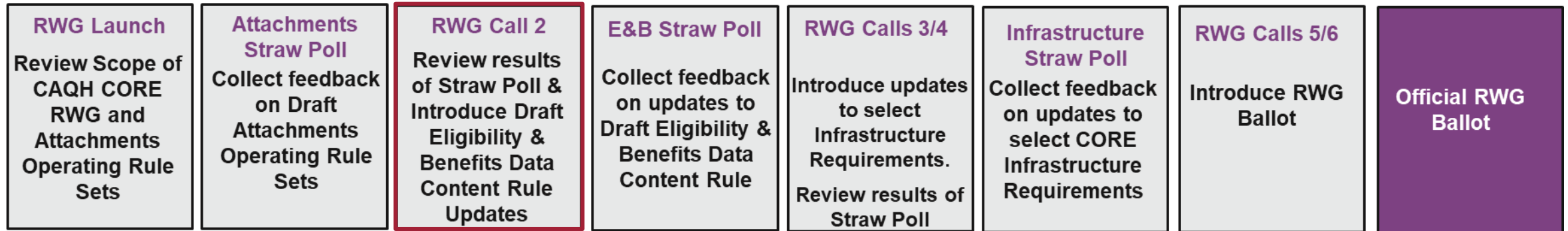
RWG Call #1
2:00 pm - 3:30 pm

- 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.

Review Work Group Milestones

Level Set for Today's Call

We are here



Today

- **Review Results of RWG Straw Poll 1, including:**
 - Respondent support for Draft CAQH CORE Attachments Operating Rules (Prior Authorization & Claims Use Cases)
 - Respondent support for Draft CAQH CORE Attachments Certification Test Scenarios (Prior Authorization & Claims Use Case)
- **Agree to adjustments** to the draft requirements, as necessary.
- **Provide an overview** of the Draft Eligibility & Benefits Data Content Rule Update that will be surveyed in the upcoming RWG Straw Poll 2.
- **Agree to Next Steps.**

Upcoming

- **Straw Poll #2**
 - Indicate level of support for Draft CAQH CORE Eligibility & Benefits Data Content Rule Updates.
 - Indicate level of support for Draft CAQH CORE Eligibility & Benefits Certification Test Scenarios Updates.
- **RWG Call 3.**

RWG Straw Poll 1 Results: Draft Attachments Operating Rules

Mahesh Siddanati
RWG Co-chair, Centene

RWG Straw Poll 1 Results

Background

Purpose of Straw Poll: To collect feedback and level of support on the Draft CAQH CORE Attachments Operating Rules and Certification Test Scenarios prior to the RWG Ballot.

Draft CAQH CORE Attachments Rules and Certification Test Scenarios Include:

1. **Part A:** Draft CAQH CORE Attachments (275/278) Prior Authorization Infrastructure Rule
2. **Part B:** Draft CAQH CORE Attachments (275/278) Prior Authorization Data Content Rule
3. **Part C:** Draft CAQH CORE Attachments (275/278) Prior Authorization Certification Test Scenarios
4. **Part D:** Draft CAQH CORE Attachments (275/837) Claims Infrastructure Rule
5. **Part E:** Draft CAQH CORE Attachments (275/837) Claims Data Content Rule
6. **Part F:** Draft CAQH CORE Attachments (275/837) Claims Certification Test Scenarios

RWG Straw Poll 1 Results

Respondent Breakdown

Respondent Breakdown: Responses were received from **27** respondents representing **68%** of RWG Participating Organizations.

Number of RWG Participating Organizations	40
Total Number of RWG Participating Organization Responses	27 (68% of RWG Entities)
Number of Provider / Provider Association Responses	2 (7% of respondents)
Number of Health Plan / Health Plan Association Responses	10 (37% of respondents)
Vendor / Clearinghouse Responses	10 (37% of respondents)
Number of Government / 'Other' Responses (includes SDOs)	5 (19% of respondents)

All sections of the Draft Attachments Operating Rule Requirements and Certification Test Scenarios received $\geq 87\%$ support.

RWG Straw Poll 1 Results

Draft CAQH CORE Attachments (275/278) PA Rule Set

- Draft CAQH CORE Attachments (275/278) Infrastructure Rule
- Draft CAQH CORE Attachments (275/278) Data Content Rule
- Draft CAQH CORE Attachments (275/278) PA Test Scenarios

Mahesh Siddanati
RWG Co-chair, Centene

Robert Bowman
Director, CAQH CORE

RWG Straw Poll 1 – Results by Section

Draft CAQH CORE Attachments (275/278) PA Infrastructure Rule

#	Draft Requirement	% Support		
		Yes (%)	No (%)	Abstain
1	§ 1-2.1 CAQH CORE Attachments Rule: Background*	24 (92%)	2 (8%)	1
2	§ 2.2 Business Requirement Justification and Focus	23 (96%)	1 (4%)	3
3	§ 3 Scope	23 (96%)	1 (4%)	3
4	§ 4.1 Processing Mode Requirements*	23 (96%)	1 (4%)	3
5	§ 4.2 Connectivity Requirements for X12 275 Attachments*	24 (96%)	1 (4%)	2
6	§ 4.3 System Availability and Reporting Requirements*	23 (92%)	2 (8%)	2
7	§ 4.4 Payload Acknowledgements and Response Time Requirements*	22 (96%)	1 (4%)	4
8	§ 4.5 Data Error Handling Requirements for Attachments*	23 (96%)	1 (4%)	3
9	§ 4.6 File Size*	24 (96%)	1 (4%)	2
10	§ 4.7 Companion Guide Requirements*	25 (100%)	0 (0%)	2
11	§ 5 Infrastructure Requirements for Attachments Using the Non-X12 Method	22 (92%)	2 (8%)	3

*Requirements in the Draft Attachments (275/278) Prior Authorization Infrastructure Rule that are identical to the requirements in the Draft Attachments (275/837) Claims Infrastructure Rule were only straw polled **once**. These requirements are indicated in the table above with an asterisk (*).

Reminder: Many of the draft requirements included in the non-X12 section of the rules (Section 5) are **identical** to the draft requirements in the X12 section (Section 4) of the rules. Identical requirements were only straw polled once.

RWG Straw Poll 1 – Results by Section

Draft CAQH CORE Attachments (275/278) PA Data Content Rule & Certification Test Scenarios

#	Draft Requirement	% Support		
		Yes (%)	No (%)	Abstain
1	§ 2.2 Business Requirement Justification and Focus	23 (96%)	1 (4%)	3
2	§ 3 Scope	22 (96%)	1 (4%)	4
3	§ 4.1 Reassociation Requirements Using the X12 275 Transaction	20 (87%)	3 (13%)	4
4	§ 5.1 Reassociation Requirements Using the Non-X12 Method	20 (91%)	2 (9%)	5
5	§ 6 Appendix: X12 TR3 Data Elements and Reference Identification Mapping	21 (91%)	2 (9%)	4

#	Draft Certification Test Scenarios	% Support		
		Yes (%)	No (%)	Abstain
1	CAQH CORE Attachments (275/278) PA Certification Test Scenarios	18 (95%)	1 (5%)	8

NOTE: No Points of Clarification or Substantive comments were received in response to the Draft CAQH CORE Attachments (275/278) Prior Authorization Certification Test Scenarios. Non-substantive comments are summarized in Doc 3: RWG Straw Poll 1 Results for offline review.

RWG Straw Poll 1

Comment Categorization

Comments received on the RWG Straw Poll were grouped into three categories.

- **Substantive Comments** – May impact rule requirements; some comments require Work Group discussion on potential adjustments to the draft requirements.
- **Points of Clarification** – Pertain to areas where more explanation for the Work Group is required; *may* require adjustments to the rule which do not change rule requirements.
- **Non-substantive Comments** – Pertain to typographical/grammatical errors, wordsmithing, clarifying language, addition of references; do not impact rule requirements.

On today's call, we will discuss comments received that may **require adjustments to the draft rules or where additional explanation is required** before proceeding with adjustments. All comments received were summarized in a separate document for offline review (*Doc 3 RWG Straw Poll Comments*). RWG participants are encouraged to review this document as there were adjustments for clarity recommended by straw poll respondents that will not be discussed on the call today.

RWG Straw Poll 1 Results – Comments Received

Draft CAQH CORE Attachments (275/278) Prior Authorization Operating Rules

Summarized Comments

1 **Scope:** One entity recommended several adjustments to the scope of the Draft Attachments (275/278) Prior Authorization Operating Rules.

Draft Attachments (275/278) Prior Authorization Infrastructure Rule:

- Change the wording in line 158 describing the benefits of the draft rule and the use of CORE Connectivity.

Draft Attachments (275/278) Prior Authorization Data Content Rule:

- Add clarifying language stating pharmacy is out of scope.
- Add a footnote addressing FHIR to FHIR exchanges and providing specific examples of exchange methods for non-X12 payload types.
- The also asked for how these rules apply if a provider is only compliant with the federally mandated [CORE Connectivity vC2.2.0](#).

CAQH CORE RWG Co-chair & Staff Response

1 **Adjust for clarity.** RWG Co-chairs and CORE staff recommend adjusting Section 3 Scope, to describe the benefits of the draft rule as recommended by the commenter.

NOTE: Adjustments for clarity to the CORE Connectivity language will be made in the Section 4.2 CORE Connectivity of the draft rule (see *Supplemental Document: RWG Straw Poll Results* for additional details).

Adjust for clarity. A footnote will be added to clarify that pharmacy is out of scope, consistent with the existing CAQH CORE Prior Authorization (278) Data Content Rule.

Do not adjust. The Draft Attachments 275/278 Prior Authorization Data Content Rule addresses attachments exchanged with an X12 275 or without using an X12 275 using CORE Connectivity. The draft rule does not address attachments sent using FHIR to FHIR exchanges.

NOTE: The draft rules specify the use of [CORE Connectivity vC4.0.0](#). However, adoption of these draft rules is currently voluntary.

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/278) Prior Authorization Infrastructure Rule

Summarized Comments

CAQH CORE RWG Co-chair & Staff Response

2 Processing Mode: One entity suggested that health plans should be required to support both Real Time and Batch Processing when sending attachments to support an X12 v5010 278.

2 Do not adjust. Given 96% of RWG straw poll respondents voted in support of the Draft Processing Mode Requirements, and to remain consistent with the CAQH CORE Prior Authorization (278) Infrastructure Rule, CAQH CORE RWG Co-chairs and CORE staff recommend continuing to support the requirement as drafted. As such, a health plan or its agent must implement either Batch Processing **or** Real-Time Processing Mode for the X12 v6020 275.

Optionally, a health plan and its agent may elect to implement both Real Time and Batch Processing Modes.

3 System Availability: One entity noted that the Draft System Availability Requirements should also pertain to the X12 v6020 824 transaction.

3 Adjust for clarity*. RWG Co-chairs and CORE staff recommend adjusting Section 4.3 System Availability and Reporting Requirements to include support for X12 v6020 275, X12 v6020 999 and **X12 v6020 824**, as recommended by the commenter.

4 File Size: One entity recommended adding language to clarify that multiple attachments may be sent within a single instance of the X12 v6020 275 transaction and that the requirement minimum file size that must be supported applies to the transaction, not per loop.

4 Adjust for clarity*. RWG Co-chairs and CORE staff recommend including a footnote explaining that the 64MB maximum applies to the entire content of the BDS segment of the X12 v6020 275 transaction and therefore, multiple attachments may be included in a single X12 v6020 275.

* Adjustment will also be made in Draft CAQH CORE Attachments (275/837) Claims Infrastructure Rule for consistency.

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/278) Prior Authorization Infrastructure Rule

Summarized Comments

5 Data Error Handling: One entity commented that there is no timing requirement on the X12 v6020 824 receiver for when an X12 v6020 999 must be returned.

CAQH CORE RWG Co-chair & Staff Response

5 Do not adjust. Given this draft requirement received 96% support from RWG straw poll respondents and in alignment with Data Error Handling Requirements in existing CAQH CORE Infrastructure Rules, RWG Co-chairs and CORE staff do not recommend adjusting the draft requirement. As such, the Draft Data Error Handling Requirements do not address response times for return of the X12 824 or X12 999 transactions.

Given the focus of the draft requirement is to standardize the error message(s) that must be returned, the draft requirement intentionally does not provide response time guidance for the X12 999 transaction sent by the provider or its agent after receiving the X12 824. For additional context, the draft requirement requires the receiver (client) to return an X12 v6020 824 to notify providers and their agents of the acceptance, acceptance with error, or rejection of the X12 275 transaction and the content of the BDS segment. It does not specify timing for the return of the X12 v6020 824 given this requirement follows the specification to send an X12 999 response within 20 seconds for Real-Time and two business days for Batch Processing Mode after receiving the initial X12 275 transaction.

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/278) Prior Authorization Data Content Rule

Summarized Comments

6 Reassociation (General): One entity suggested adding language to clarify when a reassociation requirement applies to the solicited workflow vs. the unsolicited workflow.

They also recommended incorporating Footnote 7 into the main body of the rule text given the footnote establishes a requirement for health plans to provide additional clarity regarding which stakeholder type is responsible for supporting the reassociation requirements.

CAQH CORE RWG Co-chair & Staff Response

6 Adjust for clarity. RWG Co-chairs and CORE staff recommend making edits to this section to ensure the draft language specifies that the requirements apply to solicited and unsolicited workflows.

Adjust for clarity. RWG Co-chairs and CORE staff do not recommend moving Footnote 7 to the body of the text as it clarifies that entities are not required to use the X12 275, given it is not federally mandated. However, an adjustment will be made to clarify that entities (including health plans, providers and their agents) *should* use the reassociation requirements.

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/278) Prior Authorization Data Content Rule

Summarized Comments

- 7 Common Reference Data for Reassociation Using the X12 Method (Section 4):** Two entities recommended adjustments to *Draft Section 4.1.1.1 – Common Reference Data Used to Reassociate an X12 275 and an X12 278 Request*.
- One noted that for reassociation to be successful, common reference data such as DOB or DOS must be present in both transactions (X12 v6020 275 and X12 v5010 278).
 - Another explained Section 4.1.1.1 provides recommendations rather than requirements, which may add confusion if not aligned with requirements established by health plans. They note that the section conflicts with later requirements that specify a provider must send all available data elements.

CAQH CORE RWG Co-chair & Staff Response

- 7**
- **Adjust for clarity.** RWG Co-chairs and CORE staff recommend adjusting Draft Section 4.1.1.1 to specify that the common reference data is included *in* the X12 v6020 275 and its associated payload rather than *on* the X12 v6020 275.
 - **Do not adjust.** Given Section 4.1 of the draft rule received 87% support from RWG straw poll respondents, RWG Co-chairs and CORE staff do not recommend adjusting the draft rule section.

Additionally, the common reference data listed in the draft requirement are only required *if available* to the provider at the time of attachment submission. The list is not intended to be prohibitive or exhaustive; it represents commonly available data that, after several reviews, Attachments Advisory Group and Attachments Subgroup participants (including providers, health plans and vendors) ranked most useful in assisting document management systems with reassociation of an attachment to its original prior authorization submission.

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/278) Prior Authorization Data Content Rule

Summarized Comments

8 Reassociation Requirements – Non-X12 Method (Section 5): Three entities suggested adjustments for clarity to Section 5.

- Two of these recommended adjustments to the Patient Name and Subscriber/Dependent First & Last Name fields.
- One further commented that ‘unsolicited’ was removed in the intro language for the Draft Attachments Claims Data Content Rule, but not the Draft Attachments PA Data Content Rule.
- Another recommended clarifying what a provider *must* do vs. what a provider *can* do and further highlighting which requirements apply to solicited vs. unsolicited attachments.
- This entity also suggested establishing a minimum set of data elements rather than requiring providers to include all available data elements to assist with reassociation. They also questioned the responsibility of the health plan if a provider does not send all listed data elements, as providers should not need to send additional information to support reassociation.
- Another further explained that ‘NPI’ should be further specified (e.g., billing provider, servicing provider, etc.).

CAQH CORE RWG Co-chair & Staff Response

8 Adjustments for clarity. RWG Co-chairs and CORE Staff suggest the following changes to the rule language:

- Adjust ‘Patient Last Name’ to ‘Patient Name’.
- Adjust Section 5 of the rule to clarify that the draft requirements apply to both solicited and unsolicited workflows.
- Remove ‘unsolicited’ from the introduction language in this section to align with the Draft Attachments 275/837 Data Content Rule.

Do not adjust. RWG Co-chairs and CORE Staff do not recommend making the following adjustments to the rule language.

- **NPI:** The data elements included in this section are recommendations and are not intended to be exhaustive or prohibitive, meaning providers may submit more (or more specific) data elements than are listed. Further specification of NPI would require billing departments to assign unique ID systems.
- **Minimum Data Set:** The data elements are included by the provider *if available*, establishing a minimum data set without placing undo burden on providers to include elements that are not available. Additionally, given the list is a recommendation to assist with reassociation, the provider is not required to send the elements. Agreements between trading partners are outside the scope of CAQH CORE Rules.

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/278) Prior Authorization Data Content Rule

Summarized Comments

- 9 Appendix (Table 6.1 – X12 TR3 Data Elements and Reference Identification Mapping):** Three entities suggested adjustments to Appendix Table.
 - One noted that Attachment Control Number is not the same as a Prior Auth Control Number. They also suggested adding a definition for ‘Internal Medical Facility Number’.
 - Another commented that there is no Case Reference ID in the UM Segment of the X12 278, but it is included as a data element in the table.
 - Another noted that some fields do not have values in the X12 275 column and asked why they are included in the table. They also note that ‘PA Tracking Number’ is only assigned by the health plan, not the provider.

CAQH CORE RWG Co-chair & Staff Response

- 9 Adjustments for clarity.** RWG Co-chairs and CORE Staff suggest the following changes to the rule language:
 - Remove ‘Payer’s Auth Control Number’ from the definition of Attachment Control Number and draft a definition for ‘Internal Medical Facility Number’. CORE Staff will ensure adjustments align across the Attachments (275/278) PA Data Content Rule and Attachments (275/837) Data Content Rule, as needed.
 - Adjust ‘Case Reference ID’ to ‘Case Reference Number/Case ID Number’ for clarity.
- NOTE:** The table included in Section 6 Appendix includes X12 elements that may assist with reassociation when using the **X12 Method only**. The elements listed are neither exhausted nor prohibitive and only serve as a reference.
- Do not adjust.** RWG Co-chairs and CORE Staff do not recommend adjusting the definition of ‘PA Tracking Number’ given the PA Tracking Number can be assigned by both health plan and provider. Therefore, the definition in the Appendix Table includes both options as reference.
- NOTE:** The clarification for field values of ‘NA’ was made in Section 4.1.1.1 of this rule. See comment 7 in this deck for additional information.

RWG Straw Poll 1 Results

Draft CAQH CORE Attachments (275/837) Claims Rule Set

- Draft CAQH CORE Attachments (275/837) Infrastructure Rule
- Draft CAQH CORE Attachments (275/837) Data Content Rule
- Draft CAQH CORE Attachments (275/837) Claims Test Scenarios

Emily TenEyck
Manager, CAQH CORE

RWG Straw Poll 1 – Results by Section

Draft CAQH CORE Attachments (275/837) Claims Infrastructure Rule

#	Draft Requirement	% Support		
		Yes (%)	No (%)	Abstain
1	§ 2.2 Business Requirement Justification and Focus	25 (100%)	0 (0%)	2
2	§ 3 Scope	23 (92%)	2 (8%)	2
3	§ 4.6.3 Use of Multiple LX Loops on an X12 275 Transaction when Sending Multiple Attachments for a Single Claim	23 (92%)	2 (8%)	2
4	§ 4.8 Electronic Policy Access	24 (100%)	0 (0%)	3
5	§ 5 Infrastructure requirements for Additional Documentation using the Non-X12 Method	21 (91%)	2 (9%)	4

RWG Straw Poll 1 – Results by Section

Draft CAQH CORE Attachments (275/837) Claims Data Content Rule & Certification Test Scenarios

#	Draft Requirement	% Support		
		Yes (%)	No (%)	Abstain
1	§ 2.2 Business Requirement Justification and Focus	24 (96%)	1 (4%)	2
2	§ 3 Scope	23 (92%)	2 (8%)	2
3	§ 4.1 Reassociation Requirements Using the X12 275 Transactions	22 (88%)	3 (12%)	2
4	§ 5.1 Reassociation Requirements Using the Non-X12 Methods	22 (92%)	2 (8%)	3
5	§ 6 Appendix: X12 TR3 Data Elements and Reference Identification Mapping	23 (92%)	2 (8%)	2

#	Draft Requirement	% Support		
		Yes (%)	No (%)	Abstain
1	CAQH CORE Attachments (275/837) Claims Certification Test Scenarios	20 (91%)	2 (9%)	5

NOTE: No Points of Clarification or Substantive comments were received in response to the Draft CAQH CORE Attachments (275/278) Prior Authorization Certification Test Scenarios

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/837) Health Care Claims Infrastructure Rule

Summarized Comments

- 1 Scope:** Two entities provided comments specific to the scope of the Draft Attachments (275/837) Health Care Claims Infrastructure Rule.
- One of these entities noted that the X12 837 guide numbers are not listed.
 - Another asked for clarification as to why the version of the X12 277 RFAI that is include in the rule is v6020 rather than v5010. They explained that if a health plan receives a claim in the v5010 format, they would respond with a v5010 277 RFAI.

CAQH CORE RWG Co-chair & Staff Response

- 1 Do not adjust.** RWG Co-chairs and CORE staff do not recommend adjusting the scope section of the Draft Attachments Claims (275/387) Infrastructure Rule.
- The draft language includes X12 837 Professional, Institutional, and Dental transactions in *Draft Section 3.1 What the Rule Applies to* and states that the X12 837 transactions are collectively referenced as X12 837 after one occurrence of listing the full transaction names including guide numbers.
 - Additionally, given the X12 v6020 277 RFAI supports the use of LOINC in the STC01-1270-04 data elements, and this capability is incorporated into the Draft Attachments (275/837) Health Care Claims Data Content Rule reassociation requirements, RWG Co-chairs and CORE staff do not recommended changing the version supported.

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/837) Health Care Claims Infrastructure Rule

Summarized Comments

- 2 File Size – Use of Multiple LX Loops:** Two entities provided recommendations for *Draft Section 4.6.3 Use of Multiple LX Loops on an X12 275 Transaction when Sending Multiple Attachments for a Single Claim*.
- One of these suggested that there should be a significant increase to the maximum file size of 64MB.
 - Another asked if the rule should include guidance on the maximum number of LX loops that can be submitted within a BDS Segment.

CAQH CORE RWG Co-chair & Staff Response

- 2 Do not adjust.** RWG Co-chairs and CORE staff do not recommend adjusting the draft language in this section.
- Like prior CAQH CORE Operating Rule requirements, this requirement 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 must accept files **at least** as large as 64MB. Smaller file sizes can be accepted.
 - The TR3 has semantic requirements for the number of LX Loops allowable (the X12 v6020 275 supports >1 LX Loops, with each LX Loop supporting one BDS Segment per loop) and the CORE rules do not repeat requirements found in standards. As such, RWG Co-chairs and CORE staff do not recommend establishing the maximum number of LX Loops that can be submitted within a BDS Segment.

- 3 Electronic Policy Access:** One entity commented that while they support the draft requirement requiring a health plan to offer an electronic method for identifying the attachment-specific data needed to support claim adjudication, there should be additional guidance on how readily available the method is and that it can be located by any trading partner.

- 3 Adjust for clarity.** RWG Co-chairs and CORE staff recommend adjusting the draft language to specify that the electronic method should be readily available to any trading partner, as recommended by the commenter.

RWG Straw Poll Results – Comments Received

Draft CAQH CORE Attachments (275/837) Health Care Claims Data Content Rule

Summarized Comments

- 4 Reassociation Requirements – X12 Method (Section 4):** Two entities provided comments in response to *Draft Section 4.1 Reassociation Requirements Using the X12 Method* that were specific to supporting Health Care Claims.
- One of these asked for additional clarification pertaining to the unsolicited attachment requirements. They provided the example that health plans require the Individual Claim Number to be submitted as the attachment control number and given the Individual Claim Number is not always available at time of submission, it leads to additional burden on trading partners.
 - Another asked why the dental claim format does not apply to Draft Section 4.1.1, which specifies the use of Code EL.

CAQH CORE RWG Co-chair & Staff Response

- 4 Adjust for clarity.** RWG Co-chairs and CORE staff recommend adjusting the draft reassociation requirement language to ensure it specifies that the requirements apply to solicited and unsolicited workflows and that adjustments align with the suggested edits to the Draft Attachment Prior Authorization Data Content Rule.
- Do not adjust.** To align with the CAQH CORE (837) Health Care Claims Infrastructure Rule, which includes support for Professional, Institutional, and Dental Claims, the Draft Attachments (275/837) Claims Data Content Rule includes support for Professional Institutional and Dental Claims. However, given the X12 v6020 277 is not used with Dental Claims, it was placed out of scope for this specific requirement only.

- 5 Appendix (Table 6.1 – X12 TR3 Data Elements and Reference Identification Mapping):** One entity explained that ‘Patient Control Number’ included in the Appendix Table of the Draft Attachments Claims Data Content Rule is included in X12 v6020 277 RFAI and in the X12 v6020 275, but the table indicates they are not included.

- 5 Adjust for clarity.** RWG Co-chairs and CORE staff recommend adjusting the Draft Appendix Table to further specify the use of Patient Control Number for clarity and accuracy, as recommended by the commenter.

Draft Updates to the CAQH CORE Eligibility & Benefits Data Content Rule

Donna Campbell
RWG Co-chair, HCSC

CAQH CORE Eligibility & Benefits Data Content Rule

Overview of Existing Rule Requirements

The **CAQH CORE Eligibility & Benefits Data Content Rule** requires the submission and return of certain uniform data elements in real time for electronic eligibility, coverage, and benefit transactions.

- Support requests for benefit information **at least 12 months into the past and up to the end of the current month.**
- Inclusion of the following in response to both generic and explicit inquires:
 - **Name of the health plan** covering the individual.
 - Patient financials for **co-insurance, co-payment, and base and remaining deductibles.**
 - If financial responsibility is different for **in-network** vs. **out-of-network**, both amounts must be returned.
- Return of CORE-required eligibility & benefits data for **52 specific Service Type Codes.**
- Requires health plans and providers to uniquely identify patients (subscribers, members, beneficiaries) for the purpose of ascertaining the eligibility of the patient for health plan benefits via **last name normalization.**
- Defines a standard way for health plans to report errors in the event they are not able to respond to a provider with eligibility information for the requested patient or subscriber through **AAA error code reporting requirements.**
- Vendors must be able to **detect and extract all data elements** to which the data content rule applies as returned by the health plan in the X12 271 response.

CAQH CORE Eligibility & Benefits Data Content Rule Update

Scope

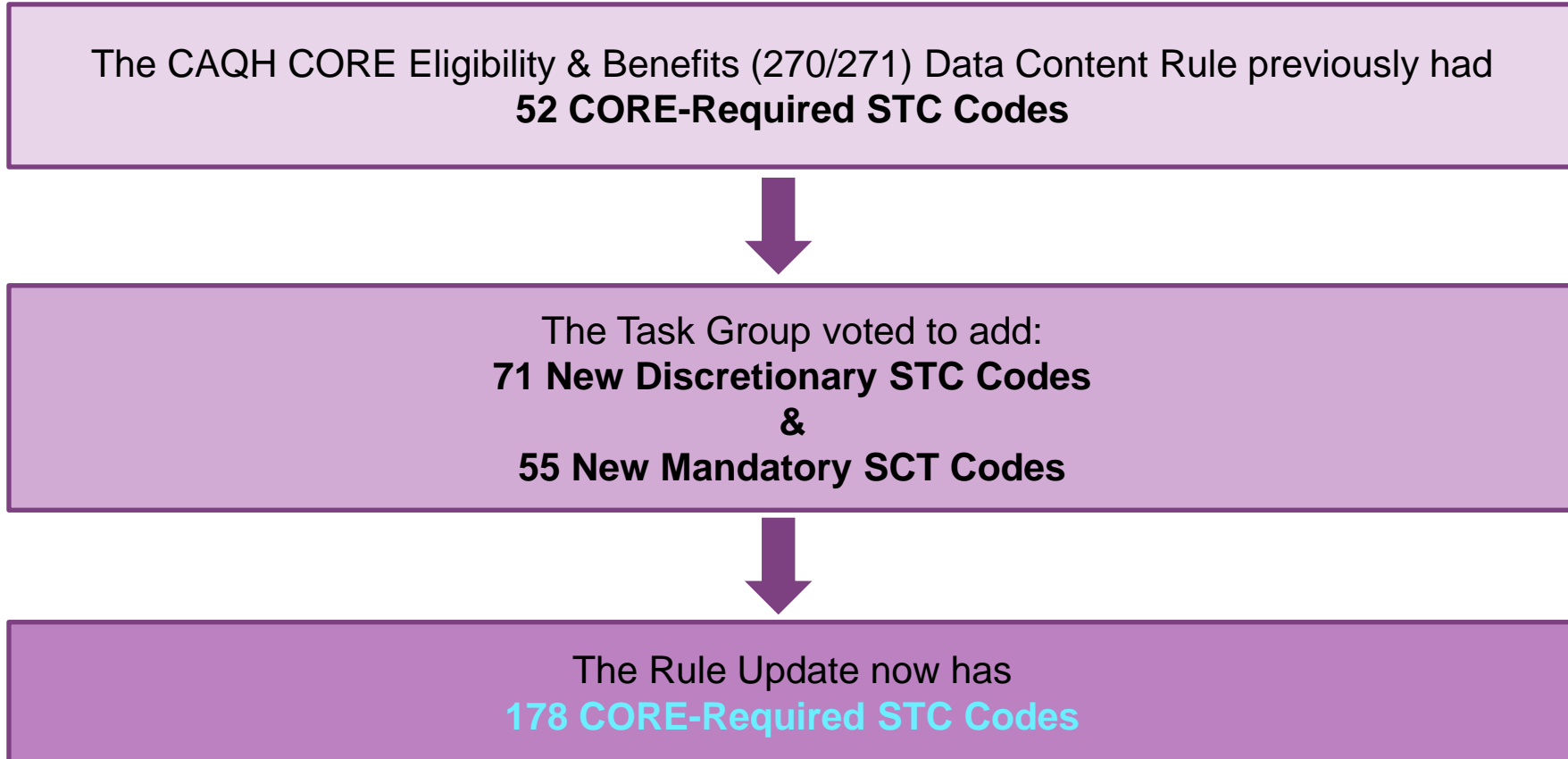
The **Draft CAQH CORE Eligibility & Benefits Data Content Rule Update** enhances the exchange of eligibility information between health plans and providers through requirements including providing financial information, especially co-insurance, co-payment, deductible, remaining deductible amounts, and coverage information for a set of service types in real time.

- In Fall 2020, CAQH CORE participants identified the eligibility and benefits business process as an area for CAQH CORE to prioritize for operating rule development in 2021 given evolving business needs since rule was first developed.
- In Spring 2021, CAQH CORE launched a Task Group to evaluate opportunity areas for operating rule enhancement for the CAQH CORE Eligibility & Benefits Data Content Rule. The Task Group evaluated numerous opportunity areas and drafted operating rules for the following areas:
 1. **Telemedicine:** Address the emergent need to communicate telemedicine-specific eligibility and benefit information
 2. **Service Type Codes:** Include adding additional SCT Codes beyond the current 52 CORE-required STC codes
 3. **Remaining Coverage Benefits:** Support the communication of the number of remaining visits/services left on a benefit
 4. **Procedure Codes:** Ability to respond to eligibility and benefit requests at the procedure level (e.g., CPT, HCPCS)
 5. **Prior Authorization/Certification:** Ability to communicate if prior authorization/certification is required for a specific procedure or service
 6. **Tiered Benefits:** Provision of more granular level data for members of tiered benefit plans

NOTE: The CAQH CORE Eligibility & Benefits Task Group completed its draft of the updated requirements in its last Straw Poll and agreed to forward the updated draft rule to this Review Work Group for further review and refinement.

CAQH CORE Eligibility & Benefits Data Content Rule Update

Service Type Codes



Work Group Next Steps

Donna Campbell
RWG Co-chair, HCSC

Review Work Group Straw Poll #2

Instructions, Guidelines & Due Date

- Objectives:**
1. Indicate support for each section of the DRAFT CAQH CORE Eligibility & Benefits Data Content Rule Update
 2. Indicate support for updates to the DRAFT CAQH CORE Eligibility & Benefits Certification Test Scenarios

RWG Straw Poll #2 Format

- ❑ **Support for Draft CAQH CORE Eligibility & Benefits Data Content Rule Update:** Respondents will be asked to indicate whether their organization supports the Draft Section being straw polled.
- ❑ **Support for Draft updates to the CAQH CORE Eligibility & Benefits Certification Test Scenarios:** Respondents will be asked to indicate whether their organization supports the updated Certification Test Scenario, as drafted.
- ❑ If applicable, respondents may provide comments relating to their responses. When providing comments, please indicate the **specific Subsection and line number(s)** to which your organization's comments apply.
- ❑ As always, Respondents may choose to abstain from responding to a given question, if they desire.

Additional Guidance

- Straw Poll #2 responses are due **via the online submission form by Friday, 10/22/21, end of day.**
- The form is to be completed by CAQH CORE RWG Participants only; **please coordinate to submit one response for your organization.**
- Questions should be directed to Kaitlin Powers, CORE Associate, at kpowers@caqh.org.
- **NOTE:** In accordance with CAQH CORE policy, all responses will be kept strictly confidential and will be reported in aggregate at the stakeholder level.

Review Work Group Next Steps



CAQH CORE Review Work Group Participants:

- Complete Straw Poll #2 by **Friday, 10/22/21, end of day** on the Draft CAQH CORE Eligibility & Benefits Data Content Rule Updates.
- Participate in the next CAQH CORE RWG Call, Call 3, on **Thursday, 10/21/21 from 2:00-3:30 PM ET** where the group will review the results of the **CAQH CORE Infrastructure Rule Requirement Update Survey**.



CAQH CORE Staff & Co-Chairs:

- Distribute Straw Poll #2 to participants by **Friday, 10/08/21, end of day**.
- Draft a call summary for today's call.

Contact CORE@caqh.org with any questions.

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Appendix

Today's Call Documents

Document Name
Doc #1 RWG Call 2 Deck 09.23.21
Doc #2 RWG Call 1 Summary 08.26.21
Doc #3 Supplemental Document: RWG Straw Poll 1 Results 09.23.21

CORE Staff*	Email Address
Bob Bowman, <i>Director</i> , CORE	rbowman@caqh.org
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Kaitlin Powers, <i>Associate</i> , CORE	kpowers@caqh.org

*CAQH CORE Staff supporting each RWG call may be adjusted based on the primary topic(s) covered on the call (e.g., Attachments, Eligibility & Benefits, Infrastructure Update).

CAQH CORE Review Work Group

Activity Schedule

Work Group Activity	Date	Topic
Work Group Call #1 TOPIC(S): Attachments; Eligibility; Infrastructure	Thursday 8/26/21 2:00 – 3:30 PM ET	<ul style="list-style-type: none"> ▪ Level Set ▪ RWG Scope <ul style="list-style-type: none"> • Draft CAQH CORE Attachments Rules (Prior Authorization and Claims Use Cases) and Draft CAQH CORE Eligibility Data Content Update. • CAQH CORE Infrastructure Update ▪ Next Steps including RWG Straw Poll #1.
Work Group Straw Poll #1 TOPIC(S): Attachments	Monday 8/30/21 – Friday 9/10/21	<ul style="list-style-type: none"> ▪ Indicate level of support for Draft CAQH CORE Attachments Operating Rules & Test Scenarios (Prior Authorization and Claims Use Cases).
CAQH CORE Infrastructure Update Survey	Wednesday 9/1/21 – Friday 9/17/21	<ul style="list-style-type: none"> ▪ Collect feedback from CAQH CORE Participants on priority topics for CAQH CORE Infrastructure Update.
Work Group Call #2 TOPIC(S): Attachments; Eligibility; Infrastructure Update	Thursday 9/23/21 2:00 – 3:30 PM ET	<ul style="list-style-type: none"> ▪ Review results of Straw Poll #1 on Draft CAQH CORE Attachments Rules & Test Scenarios. ▪ Review updates to Draft CAQH CORE Eligibility & Benefits Data Content Requirements. ▪ Discuss high-level results of CAQH CORE Participant Infrastructure Update Survey. ▪ Next Steps including RWG Straw Poll #2.
Straw Poll #2 TOPIC(S): Eligibility	Friday 10/8/21 – Friday 10/22/21	<ul style="list-style-type: none"> ▪ Indicate level of support for Draft CAQH CORE Eligibility & Benefits Data Content Rule Update.

CAQH CORE Review Work Group

Activity Schedule (Continued)

Work Group Activity	Date	Topic
Work Group Call #3 TOPIC(S): Infrastructure Update	Thursday 10/21/21 2:00 – 3:30 PM ET	<ul style="list-style-type: none"> Review CAQH CORE Infrastructure Update Survey Results on CAQH CORE Infrastructure Operating Rules. Discuss scope and recommended adjustments for CAQH CORE Infrastructure Update. Next Steps including RWG Straw Poll #3.
Straw Poll #3 TOPIC(S): Infrastructure Update	Monday 10/25/21 – Friday 11/5/21	<ul style="list-style-type: none"> Indicate level of support for adjustments to CAQH CORE Infrastructure Rules.
Work Group Call #4 TOPIC(S): Eligibility; Attachments	Thursday 11/4/21 2:00 – 3:30 PM ET	<ul style="list-style-type: none"> Review results of Straw Poll #2 on Draft CAQH CORE Eligibility & Benefits Data Content Rule Updates and potential additional Attachments Infrastructure adjustments. Discuss next steps.
Work Group Call #5 TOPIC(S): Infrastructure Update	Thursday 11/18/21 2:00 – 3:30 PM ET	<ul style="list-style-type: none"> Review results of Straw Poll #3 on CAQH CORE Infrastructure Operating Rules. Next Steps including RWG Straw Poll #4.
Straw Poll #4 TOPIC(S): Infrastructure Update	Friday 11/19/21 – Wednesday 12/08/21	<ul style="list-style-type: none"> Indicate level of support for adjustments to CAQH CORE Infrastructure Rules.

CAQH CORE Review Work Group

Activity Schedule (Continued)

Work Group Activity	Date	Topic
Work Group Call #6 TOPIC(S): Infrastructure Update & Ballot	Thursday 12/16/21 2:00 – 3:30 PM ET	<ul style="list-style-type: none">Review results of Straw Poll #4 on CAQH CORE Infrastructure Operating Rules.Review Next Steps including RWG Ballot.
Ballot	Wednesday 12/22/21 – Wednesday 1/19/22	<ul style="list-style-type: none">Indicate levels of support for CAQH CORE Attachments Operating Rules Package, CAQH CORE Eligibility and Benefits Operating Rules Package, and CAQH CORE Infrastructure Operating Rules Update.
Work Group Call #7 – if needed TOPIC(S): Ballot Results	Thursday 1/27/22 2:00 – 3:30 PM ET	<ul style="list-style-type: none">Review results of Ballot and agree to any substantive adjustments prior to forwarding to Final CORE Vote.

CAQH CORE Review Work Group

Roster

Name	Organization
Janice Bakos	Aetna
Bruce Bellefeuille	Aetna
Rose Hodges	Aetna
Mark Rabuffo	Aetna
Merri-Lee Stine	Aetna
Nancy Senato	Aetna CVS Health
Heather McComas	AMA
Molly Reese	AMA
Kristina Steece	Ameritas
Mary Lynn Bushman	Anthem
Christol Green	Anthem
Shaun Grubert	Anthem/AIM Specialty Health
Brian Shaw	Anthem/AIM Specialty Health
Kevin McDermott	Anthem/AIM Specialty Health
Melissa Fiore	athenahealth, Inc.
Maeghan Oberoi-Smith	athenahealth, Inc.
Michelle Barry	Availity
Brian Beck	Availity
Justin Greer	Availity
Justin Howe	Availity
Thomas Mort	Availity
Jeremy Sacks	Availity
Steffi Silva	Availity
Susan Lippert	BCBS Michigan
Cindy Monarch	BCBS Michigan
Molly O'Malley	BCBS Michigan
Amy Turney	BCBS Michigan

Name	Organization
Heather Sammons	BCBS North Carolina
Deborah Swain	BCBS North Carolina
Sudheer Tummala	BCBS North Carolina
Susan Langford	BCBS Tennessee
Alexandra Bernard	Centene
Mahesh Siddanati	Centene
Deb McCachern	Change Healthcare
Jamie Osborne	CHOA
Megan Soccorso	Cigna
Nihal Titan	ClaimMD
Dan Medve	Cleveland Clinic
Diane Collins	CMS
Camille Haywood	CMS
Michael Johnson	CMS
Ada Sanchez	CMS
Rupinder Singh	CMS
Nick Dahl	Cognizant
Dawn Sprague	Cognizant
Bettina Vanover	Cognizant
Shilesh Nair	CSRA
Cristina Boincean	Edifecs
Nancy Buckley	Harvard Pilgrim Health Care
Gary Cole	Harvard Pilgrim Health Care
Donna Campbell	Health Care Service Corp
Racheal Washburn	Health Care Service Corp
Parag Desai	HealthEdge
Doug Hanna	HealthEdge

Name	Organization
Kathy Letendre	HealthEdge
Christopher Gracon	HEALTHeNET
Sandra Jamison	Humana
Amy Peterson	Humana
Andrea Brannan	Mayo Clinic
William Venhuizen	Mayo Clinic
Jameelah O'Neal	Medical Mutual
Melanie Combs-Dyer	Mettle Solutions
Drew Voytal	MGMA
Diana Fuller	Michigan Medicaid
C Veverka	Michigan Medicaid
Margaret Weiker	NCPDP
David Delano	NEHEN
Nancy Team	NextGen Healthcare
Jeffrey Blasinski	PriorAuthNow
Steven Koch	Security Health Plan of Wisconsin, Inc.
Althea Robinson	Tata Consultancy Services
Tracey Tillman	The SSI Group
Dean Randall	TrialCard
Michael Marchant	UC Davis Health
Maria Lagoutis	Unitedhealthcare
Sonya May	UnitedHealth Group
Kiran Kalluri	UnitedHealth Group
Janell Shamsideen	UnitedHealth Group
Barbara Vonasek	UnitedHealth Group
Robert Tennant	WEDI
June St John	Wells Fargo Bank, N.A.

CAQH CORE Report on Attachments

[The CAQH CORE Report on Attachments: A Bridge to a Fully Automated Future to Share Medical Documentation, published in May 2019](#)

examines challenges associated with the exchange of medical information and supplemental documentation used for healthcare administrative transactions. The report identifies five areas to improve processes and accelerate the adoption of electronic attachments.

[Full Report](#)

[Executive Summary](#)

[Press Release](#)

