# 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** | *Discussion* |
| 2:02 PM | **2. Roll Call and Administrative Items** | *Discussion* |
| 2:05 PM | **3. Summary of 8/26/21 RWG Call**<br>• Reviewed CAQH CORE Attachments Initiative and RWG Scope/Schedule.<br>• Reviewed Draft CAQH CORE Attachments Operating Rules Sets.<br>• Agreed to Next Steps. | Action Required:<br>• Approve 08/26/21 Call Summary |
| 2:10 PM | **4. RWG Timeline Level Set** | *Discussion* |
| 2:15 PM | **5. Review Results of Straw Poll including:**<br>• Respondent Breakdown and Percent Support for Draft Requirements & Certification Test Scenarios.<br>• Comments Received on Draft Attachments 275/278 PA Rules & Certification Test Scenarios.<br>• Comments Received on Draft Attachments 275/837 Claims Rules & Certification Test Scenarios.<br>• Agree to adjustments, as necessary. | *Discussion* |
| 3:00 PM | **6. Review Draft Updates to the CAQH CORE Eligibility & Benefits Data Content Rule** | *Discussion* |
| 3:20 PM<br><br>*EDT | **7. RWG Next Steps**<br>• CAQH CORE Review Work Group:<br>  ○ Participate in the next RWG Call: **Thursday, 10/21/21 at 2:00 PM ET**.<br>  ○ Complete RWG Straw Poll #2 **by end of day Friday, 10/22/21**.<br>• CAQH CORE Co-chair & staff:<br>  ○ Draft a summary for today's call.<br>  ○ Send RWG Straw Poll #2 by, **Friday, 10/08/21**. | Action Required:<br>• Agree to Next Steps |





CAQH CORE

# 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**

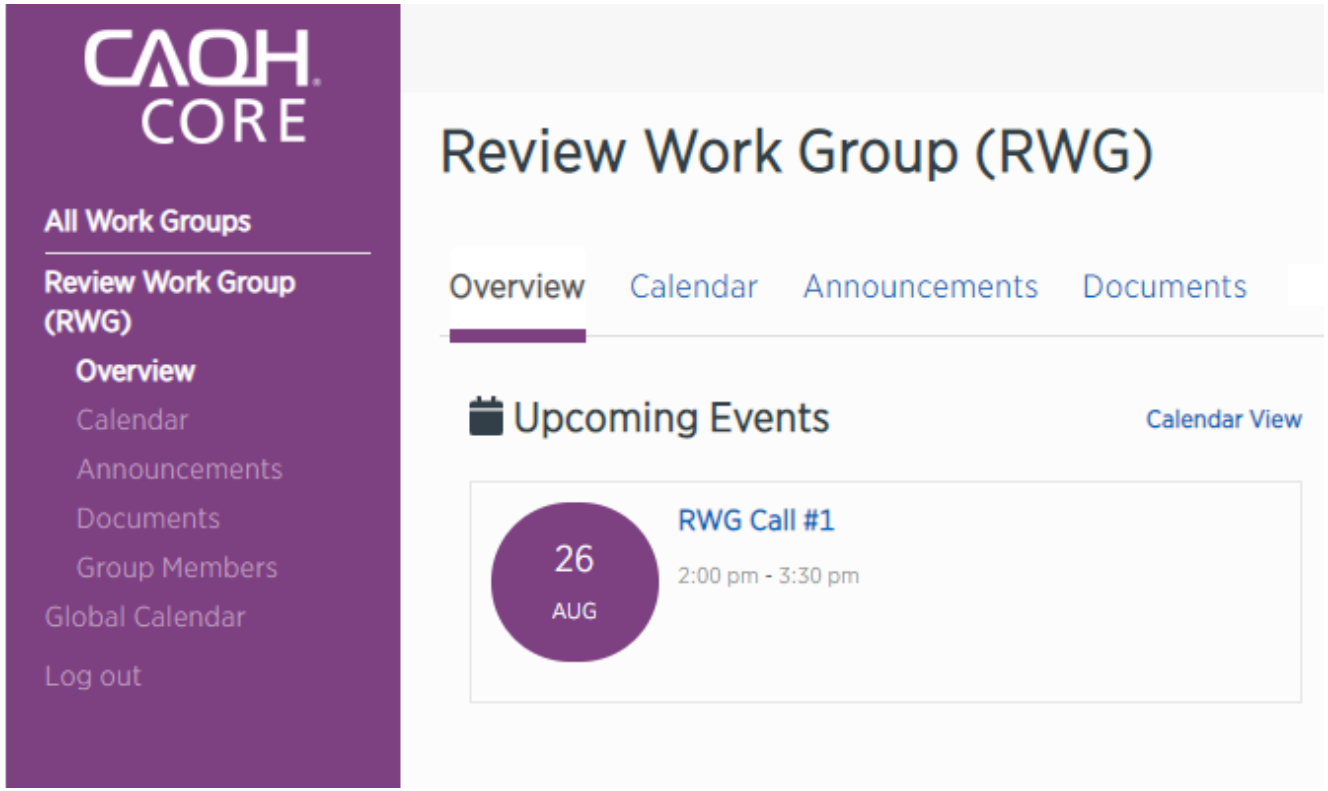
This document contains:

- 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** | • 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. | *Discussion* |
| **2. Roll Call and Administrative Items** (Doc #1; Slides 2-4) | • Bob Bowman (CAQH CORE Director) reviewed the focus of the call, which was to:<br>o Review the Review Work Group (RWG) Scope.<br>o Review the Draft CAQH CORE Attachments Operating Rules.<br>o Review the Draft updates to CAQH CORE Eligibility & Benefits Data Content Rule.<br>o Discuss Next Steps.<br>• Bob Bowman (CAQH CORE Director) reviewed the call documents:<br>o Doc #1: RWG Call 1 Slide Deck 08.26.21<br>• 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].<br>• Donna Campbell (HCSC), Mahesh Siddanti (Centene) and Molly Reese (AMA) introduced themselves as RWG Co-chairs. | *Discussion* |
| **3. Level Set** (Doc #1; Slides 5 - 10) | • Emily TenEyck (CAQH CORE Manager) provided a Level Set for the work group including details on the work group timeline.<br>• **Summary of RWG Discussion:**<br>o No questions or comments were raised by the RWG participants. | *Discussion* |
| **4. Overview of CAQH CORE RWG Scope** (Doc #1; Slides 11 - 12) | • 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.<br>• **Summary of RWG Discussion:**<br>o No questions or comments were raised by the RWG participants. | *Discussion* |

# 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 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*

| RWG Launch | Attachments Straw Poll | RWG Call 2 | E&B Straw Poll | RWG Calls 3/4 | Infrastructure Straw Poll | RWG Calls 5/6 | Official RWG Ballot |
|---|---|---|---|---|---|---|---|
| Review Scope of CAQH CORE RWG and Attachments Operating Rule Sets | Collect feedback on Draft Attachments Operating Rule Sets | Review results of Straw Poll & Introduce Draft Eligibility & Benefits Data Content Rule Updates | Collect feedback on updates to Draft Eligibility & Benefits Data Content Rule | Introduce updates to select Infrastructure Requirements. Review results of Straw Poll | Collect feedback on updates to select CORE Infrastructure Requirements | Introduce RWG Ballot | |

## 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**.





CAQH CORE

# 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 ≥ 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.





CAQH CORE

# 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 | CAQH CORE RWG Co-chair & Staff Response |
|---|---|
| 1 **Scope:** One entity recommended several adjustments to the scope of the Draft Attachments (275/278) Prior Authorization Operating Rules.<br><br>**Draft Attachments (275/278) Prior Authorization Infrastructure Rule**:<br>- Change the wording in line 158 describing the benefits of the draft rule and the use of CORE Connectivity.<br><br>**Draft Attachments (275/278) Prior Authorization Data Content Rule**:<br>- Add clarifying language stating pharmacy is out of scope.<br>- Add a footnote addressing FHIR to FHIR exchanges and providing specific examples of exchange methods for non-X12 payload types.<br>- The also asked for how these rules apply if a provider is only compliant with the federally mandated CORE Connectivity vC2.2.0. | 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.<br><br>**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).<br><br>**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.<br><br>**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.<br><br>**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.<br><br>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 | CAQH CORE RWG Co-chair & Staff Response |
|---|---|
| 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. | 5 **Do not adjust.** Given this draft requirement received 96% support from RWG straw poll respondents and the Draft Data Error Handling Requirements do not address response times for return of the X12 824 or X12 999 transactions 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.<br><br>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 | | CAQH CORE RWG Co-chair & Staff Response |
|---|---|---|---|
| 6 | **Reassociation (General):** One entity suggested adding language to clarify when a reassociation requirement applies to the solicited workflow vs. the unsolicited workflow.<br><br>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. | 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.<br><br>**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 | CAQH CORE RWG Co-chair & Staff Response |
|---|---|
| 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*.<br>- 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).<br>- 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. | 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.<br>- **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.<br>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 | CAQH CORE RWG Co-chair & Staff Response |
|---|---|
| 8 **Reassociation Requirements – Non-X12 Method (Section 5):** Three entities suggested adjustments for clarity to Section 5.<br>- Two of these recommended adjustments to the Patient Name and Subscriber/Dependent First & Last Name fields.<br>- 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.<br>- 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.<br>- 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.<br>- Another further explained that 'NPI' should be further specified (e.g., billing provider, servicing provider, etc.). | 8 **Adjustments for clarity.** RWG Co-chairs and CORE Staff suggest the following changes to the rule language:<br>- Adjust 'Patient Last Name' to 'Patient Name'.<br>- Adjust Section 5 of the rule to clarify that the draft requirements apply to both solicited and unsolicited workflows.<br>- Remove 'unsolicited' from the introduction language in this section to align with the Draft Attachments 275/837 Data Content Rule.<br>**Do not adjust.** RWG Co-chairs and CORE Staff do not recommend making the following adjustments to the rule language.<br>- **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.<br>- **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 | CAQH CORE RWG Co-chair & Staff Response |
|---|---|
| 9 **Appendix (Table 6.1 – X12 TR3 Data Elements and Reference Identification Mapping):** Three entities suggested adjustments to Appendix Table.<br>- 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'.<br>- 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.<br>- 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. | 9 **Adjustments for clarity.** RWG Co-chairs and CORE Staff suggest the following changes to the rule language:<br>- 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.<br>- Adjust 'Case Reference ID' to 'Case Reference Number/Case ID Number' for clarity.<br>**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.<br><br>**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.<br>**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 | CAQH CORE RWG Co-chair & Staff Response |
|---|---|
| 1 **Scope:** Two entities provided comments specific to the scope of the Draft Attachments (275/837) Health Care Claims Infrastructure Rule.<br>- One of these entities noted that the X12 837 guide numbers are not listed.<br>- 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. | 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.<br>- 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.<br>- 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 | CAQH CORE RWG Co-chair & Staff Response |
|---|---|
| 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.*<br>- One of these suggested that there should be a significant increase to the maximum file size of 64MB.<br>- Another asked if the rule should include guidance on the maximum number of LX loops that can be submitted within a BDS Segment. | 2 **Do not adjust.** RWG Co-chairs and CORE staff do not recommend adjusting the draft language in this section.<br>- 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.<br>- 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 | CAQH CORE RWG Co-chair & Staff Response |
|---|---|
| 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.<br>- 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.<br>- Another asked why the dental claim format does not apply to Draft Section 4.1.1, which specifies the use of Code EL. | 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.<br>**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*

The CAQH CORE Eligibility & Benefits (270/271) Data Content Rule previously had
**52 CORE-Required STC Codes**

The Task Group voted to add:
**71 New Discretionary STC Codes**
**&**
**55 New Mandatory SCT Codes**

The Rule Update now has
**178 CORE-Required STC 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.**

# 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, *Director,* CORE | rbowman@caqh.org |
| Taha Anjarwalla, *Associate Director,* CORE | tanjarwalla@caqh.org |
| Emily TenEyck, *Manager*, CORE | eteneyck@caqh.org |
| Marianna Singh, *Senior Associate,* CORE | msingh@caqh.org |
| Kaitlin Powers, *Associate,* 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**<br><br>**TOPIC(S):** Attachments; Eligibility; Infrastructure | **Thursday 8/26/21**<br>2:00 – 3:30 PM ET | ▪ Level Set<br>▪ RWG Scope<br>  • Draft CAQH CORE Attachments Rules (Prior Authorization and Claims Use Cases) and Draft CAQH CORE Eligibility Data Content Update.<br>  • CAQH CORE Infrastructure Update<br>▪ Next Steps including RWG Straw Poll #1. |
| **Work Group Straw Poll #1**<br><br>**TOPIC(S):** Attachments | **Monday 8/30/21 – Friday 9/10/21** | ▪ 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** | ▪ Collect feedback from CAQH CORE Participants on priority topics for CAQH CORE Infrastructure Update. |
| **Work Group Call #2**<br><br>**TOPIC(S):** Attachments; Eligibility; Infrastructure Update | **Thursday 9/23/21**<br>2:00 – 3:30 PM ET | ▪ Review results of Straw Poll #1 on Draft CAQH CORE Attachments Rules & Test Scenarios.<br>▪ Review updates to Draft CAQH CORE Eligibility & Benefits Data Content Requirements.<br>▪ Discuss high-level results of CAQH CORE Participant Infrastructure Update Survey.<br>▪ Next Steps including RWG Straw Poll #2. |
| **Straw Poll #2**<br><br>**TOPIC(S):** Eligibility | **Friday 10/8/21 – Friday 10/22/21** | ▪ 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**<br><br>**TOPIC(S):**<br>Infrastructure Update | **Thursday 10/21/21**<br>2:00 – 3:30 PM ET | ▪ Review CAQH CORE Infrastructure Update Survey Results on CAQH CORE Infrastructure Operating Rules.<br>▪ Discuss scope and recommended adjustments for CAQH CORE Infrastructure Update.<br>▪ Next Steps including RWG Straw Poll #3. |
| **Straw Poll #3**<br><br>**TOPIC(S):**<br>Infrastructure Update | **Monday 10/25/21 – Friday 11/5/21** | ▪ Indicate level of support for adjustments to CAQH CORE Infrastructure Rules. |
| **Work Group Call #4**<br><br>**TOPIC(S):**<br>Eligibility; Attachments | **Thursday 11/4/21**<br>2:00 – 3:30 PM ET | ▪ Review results of Straw Poll #2 on Draft CAQH CORE Eligibility & Benefits Data Content Rule Updates and potential additional Attachments Infrastructure adjustments.<br>▪ Discuss next steps. |
| **Work Group Call #5**<br><br>**TOPIC(S):**<br>Infrastructure Update | **Thursday 11/18/21**<br>2:00 – 3:30 PM ET | ▪ Review results of Straw Poll #3 on CAQH CORE Infrastructure Operating Rules.<br>▪ Next Steps including RWG Straw Poll #4. |
| **Straw Poll #4**<br><br>**TOPIC(S):**<br>Infrastructure Update | **Friday 11/19/21 – Wednesday 12/08/21** | ▪ 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**<br><br>**TOPIC(S):**<br>Infrastructure Update & Ballot | **Thursday 12/16/21**<br>2:00 – 3:30 PM ET | ▪ Review results of Straw Poll #4 on CAQH CORE Infrastructure Operating Rules.<br>▪ Review Next Steps including RWG Ballot. |
| **Ballot** | **Wednesday 12/22/21 – Wednesday 1/19/22** | ▪ 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*<br><br>**TOPIC(S):** Ballot Results | **Thursday 1/27/22**<br>2:00 – 3:30 PM ET | ▪ 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 |
| 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 |
| 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