



CAQH CORE Valuebased Payment Subgroup Meeting #2

Advancing data content requirements for benefit enrollment and claims transactions

May 18, 2023

Agenda

| Time | Topic |
|---------|--|
| 2:00 PM | Welcome, Antitrust Guidelines and Roll Call |
| 2:05 PM | Straw Poll #1 Results Support for Opportunity Areas Go-Forward Opportunities |
| 2:35 PM | X12 834 Data Content Requirements Recap of Opportunity Candidate Loops and Segments |
| 3:00 PM | X12 837 Claim Submission Introduction Health Care Claims Subgroup Collaboration Variation and VBP Use-Cases |
| 3:20 PM | Next Steps Next Meeting on June 8, 2023, 2:00-3:30pm ET Straw Poll #2 opens on May 22 |



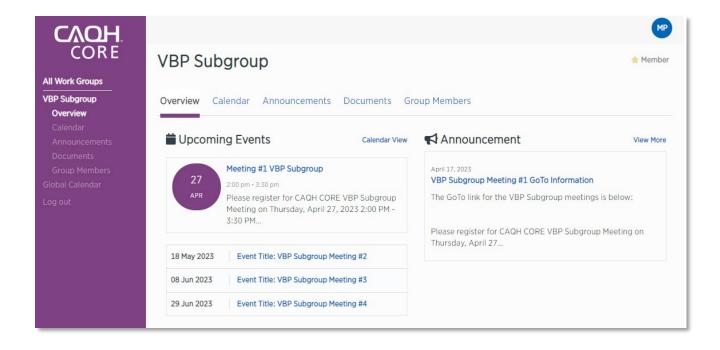
Objectives

- Understand prioritization of operating rule opportunities based on Straw Poll results.
- 2. Identify targeted loops, segments, and data elements used to support socio-demographic data exchange in the X12 834.
- 3. Review additional claim submission opportunities, understanding purpose and collaboration.
- 4. Coalesce around next steps and feel prepared for Straw Poll #2.



CAQH CORE Participant Dashboard

The **CAQH CORE Participant Dashboard** is a comprehensive resource for CAQH CORE Participants to access Subgroup information and any CAQH CORE Participant resources and events.



- The <u>dashboard</u> 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 <u>core@caqh.org</u> if you need a login.

CAQH Connect Conference



Join us for **CAQH Connect 2023**, an event bringing together healthcare industry experts, thought leaders, and executives from the nation's government, health plans, and industry associations. We will explore trends, hear innovative thinking, and discuss the future of healthcare administration, including payment integrity.

To kick off the conference, CORE will hold its first-ever in-person **CORE Participant Forum** open to all individuals from CORE Participating Organizations the afternoon of September 27th. We invite all of you to attend the forum and stay for the entire conference.



Straw Poll #1 Results

CAQH CORE VBP Subgroup

Value-based Payment Subgroup – Straw Poll #1

Straw Poll background

Purpose of Straw Poll

To provide direction on opportunity areas and rule options.

Format:

- Support for Opportunity Areas: Indicate level of support for each opportunity area.
- Direction on Potential Rule Options: Provide input on high-level rule requirements to refine opportunities.
 - Opportunities are 'moved forward' if majority of respondents 'Support' or 'Partially Support' requirements.
 - If more 'Partially Support' than 'Support' additional discussion will be undertaken to align with industry needs.

Summary of Opportunity Areas

- 1. X12 834 Socio-demographic Data Collection & Exchange: Use mandated and voluntary versions of the X12 834 to collect and exchange socio-demographic information, including granular race and ethnicity.
- 2. X12 837 Additional Claim Submission: Define standard submission for additional claims that can support value-based payment methodologies, such as risk adjustment and quality measurement.
- 3. CAQH CORE Infrastructure Rules VBP Enhancements: Potential improvements to CAQH CORE Infrastructure Rules to support the administration of VBP programs.
- **4. Semantic Interoperability in VBP:** Common industry definitions for VBP contractual terms that can unify language and minimize proprietary implementations.

Value-based Payment Subgroup Straw Poll #1

Breakdown of responses by stakeholder type

23 out of 32 unique organizations responded to Straw Poll #1 (72%).

| Distribution of Responses | Total Straw Poll Responses | Percent of Respondents |
|--------------------------------------|-------------------------------|------------------------|
| Provider/Provider Associations | 4 | 17% |
| Health Plan/Health Plan Associations | 6 | 26% |
| Vendor/Clearinghouses | 6 | 26% |
| Government/Other | 7 | 31% |

Prioritization and Support for X12 834 Opportunity Areas

| | Support for Rule Development Opportunities Within the X12 834 Transaction | | | | | |
|---|---|---------|-------------------|---------|-----------------------------|----------------|
| | Opportunity | Support | Partially Support | Neutral | Partially Do Not Support | Do Not Support |
| 1 | Member Preferred Language Collection and Exchange (2 abstentions) | 71% | 19% | 10% | 0% | 0% |
| 2 | Race and Ethnicity Data Collection Exchange (2 abstentions) | 67% | 19% | 14% | 0% | 0% |
| 3 | Gender Identity Data Collection and Exchange (2 abstentions) | 52% | 24% | 19% | 0% | 5% |
| 4 | Member Marital Status Collection and Exchange (2 abstentions) | 62% | 14% | 24% | 0% | 0% |
| 5 | Sexual Orientation Collection and Exchange (3 abstentions) | 45% | 15% | 25% | 5% | 10% |
| 6 | Member Citizenship Status Collection and Exchange (3 abstentions) | 30% | 20% | 25% | 5% | 20% |
| 7 | Exchange to providers using Plan Member Reporting Transaction (3 abstentions) | 60% | 10% | 25% | 5% | 0% |

Rows may not add to 100% due to rounding.

Comment Categorization

Substantive, point of clarification and non-substantive

- Three categories of comments
 - Substantive: May impact rule requirements; some comments require Subgroup discussion on potential adjustments to draft requirements.
 - **Points of clarification:** Pertain to areas where more explanation or the Subgroup 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.
- The VBP Subgroup will address substantive comments, points of clarification and CAQH CORE Cochair and staff recommendations.
- No non-substantive comments were received.

X12 834 Opportunity: Substantive Comments and Points of Clarification

| Substantive Comments | Co-chair and CAQH CORE Response |
|---|--|
| One organization acknowledged the cumbersome nature of supporting >900 race and ethnicity concepts, highlighting challenges of implementation. | AGREE: Collecting the entirety of the Race and Ethnicity Code Set may be unrealistic and supports establishing a <i>minimum</i> collection requirements based on the OMB Directive 15. Organizations should support exchange of any race and ethnicity concept using the unique identifiers contained in the code set. |
| 2. Five organizations highlighted the potential divisiveness of collecting citizenship status and self-reported sexual orientation citing potential privacy concerns and member harm. One organization suggested that, in lieu of citizenship, "place of birth" could be collected. | 2. AGREE: Recommend not moving forward with the collection of citizenship information given its sensitive nature. The Subgroup will reconsider the collection of sexual orientation to ensure that viable, agreed upon use-cases are determined prior to including in operating rule requirements. |
| 3. Two organizations supported that all socio-demographic information should be shared voluntarily at the discretion of the member. | AGREE: Methods to support voluntary disclosure should be included in the operating rule requirements. |



X12 834 Opportunity: Points of Clarification

| Point of Clarification | Co-chair and CAQH CORE Response |
|---|--|
| 1. Two organizations submitted that data elements from USCDI vocabulary standards are not included in the X12 standard and a maintenance request or request to reference an external code set should be submitted to X12 to support this information prior to inclusion in an operating rule. | Based on review of the TR3 and on-going liaison with X12, exchange of race and ethnicity data using the CDC Race and Ethnicity Code Set is indicated for use in the X12 TR3 as the external code set supporting select demographic fields. Though not referenced as external code sets, exchange of gender identity and sexual orientation can be facilitated using alphanumeric reference fields within the transaction. |
| 2. One organization expressed concern over differing versions of the USCDI standard, stating that the industry has just begun coalescing around version 2 and referencing version 3 may be premature or conflict with current priorities. | 2. Versioning of USCDI will be discussed by the Subgroup when determining rule requirements. Whenever possible, CAQH CORE encourages rule development that references 'most recent' or 'current' versions as a method to address dynamic industry requirements. CAQH CORE also acknowledges the recent proposal of USCDI v3 in an ONC Proposed Rule. If finalized, an operating rule could aid alignment, implementation, and conformance with this requirement. |
| 3. One organization believes that exchange would be better accomplished using the X12 270/271 allowing point-of-care review and use of socio-demographic information. | 3. CAQH CORE will take this under advisement and use it to inform opportunities for the upcoming CAQH CORE Eligibility and Benefits Task Group, launching later this year. |
| 4. One organization supports the harmonization of OMB and CDC Race and Ethnicity Code Sets. Another organization highlighted the existence of the OMB Directive 15 for consideration. | 4. The OMB Directive 15 is fulfilled by exchange of unique identifiers in the CDC Race and Ethnicity Code Set. |
| 5. One submitter acknowledges that some socio-demographic information is collected using web applications and other standards. | 5. Consideration of other standards and submission methods is necessary when developing operating rules. One goal of this Subgroup is to ensure uniform exchange across multiple methods and standards. |
| 6. One organization acknowledged potential implementation challenges but recognized that the indicated data collection aligns with internal and industry priorities. | 6. The Subgroup will consider the resources necessary for implementation during rule development. |
| 7. One submitter recommended adding social screening date and time. | 7. This information is required for collection in demographic data segments in the X12 standard. |
| 8. One organization acknowledged the benefit of the proposed collection at the point of enrollment and renewal. | 8. N/A |
| 9. One organizations pointed out the voluntary nature of the Member Plan Reporting transaction in limiting its implementation. | 9. Though implementation may be limited, this transaction is a strong method for sharing actionable information with providers. It aids the industry in standardizing exchange in VBP, reducing reliance on proprietary approaches. |



Prioritization and Support for X12 837 Opportunity Areas

| | Support for Rule Development Opportunities Within the X12 837 Transaction | | | | | | |
|---|---|---------|-------------------|---------|-----------------------------|----------------|--|
| | Opportunity | Support | Partially Support | Neutral | Partially Do Not Support | Do Not Support | |
| 1 | Quality / Outcome Measurement (2 abstentions) | 76% | 10% | 14% | 0% | 0% | |
| 2 | Risk Adjustment / Stratification (3 abstentions) | 85% | 0% | 15% | 0% | 0% | |
| 3 | Social Determinants of Health Using ICD- 10 Z-codes (1 abstention) | 73% | 9% | 18% | 0% | 0% | |
| 4 | Patient Attribution / Assignment (2 abstentions) | 71% | 5% | 14% | 5% | 5% | |
| 5 | Payment Determination / Incentives (2 abstentions) | 71% | 5% | 24% | 0% | 0% | |

Rows may not add to 100% due to rounding.

X12 837 Opportunity: Substantive Comments and Points of Clarification

| Substantive Comments | Co-chair and CAQH CORE Response | |
|---|---|--|
| One organization suggested splitting out certain terms, such as quality measurement, to differentiate between outcomes and process adherence. | AGREE: Additional refinement of terminologies and use-cases is necessary as the Subgroup gets deeper into rule development. | |
| 2. Three organizations made suggestions for other use-cases; including: Use of richer SDOH data sets. Use for public health and economics. Use of the X12 837 for data integrity checks. | 2. FOR DISCUSSION: More specificity on these recommended use-cases is needed. | |

| Point of Clarification | Co-chair and CAQH CORE Response |
|---|---|
| One organization expressed that submission of these diagnosis codes should be voluntary. | 3. An operating rule would not require submission of diagnosis codes. The purpose of this polling is to identify VBP-centered use-cases that can be applied to an operating rule for uniform additional claim submissions. This opportunity was identified through industry environmental scanning and research. |
| 4. Two organizations suggested that 12 diagnosis codes on a professional claim is too limiting and is a hindrance to the submission of certain diagnoses, such as Z-codes. | 4. This comment aligns with what was found through CAQH CORE research and environmental scanning and is the basis for why operating rule requirements for a uniform additional claim submission are being pursued collaboratively between the CAQH CORE Health Care Claims Subgroup and CAQH CORE Value-based Payment Subgroup. |
| 5. Two organizations indicated that other or updated standards and exchange methods should be considered in rule development. Importantly: Maintaining the ability to exchange information outside the claim submission. Supporting newer versions of the X12 837 standard. | 5. The intent of this rule making process is not to disallow other methods of submission, whether accommodated through web portals or through other electronic standards, such as HL7 FHIR. If the X12 837 standard is updated, CAQH CORE can update operating rules to be inclusive of new or edited requirements. |
| 6. One organization expressed unfamiliarity with the claims use-cases presented, requesting more information. | 6. Time allowing, each use-case will be reviewed during this presentation. |
| 7. Two organizations express their support for this work. | 7. N/A |



Prioritization and Support for VBP Infrastructure Opportunity Areas

Support for Rule Development Opportunities for CAQH CORE Infrastructure Rules

| | Opportunity | Support | Partially Support | Neutral | Partially Do Not Support | Do Not Support |
|---|---|---------|-------------------|---------|-----------------------------|----------------|
| 1 | Electronic Policy Access Requirements (3 abstentions) | 60% | 5% | 30% | 5% | 0% |
| 2 | Minimum Frequency for Report and/or Data Sharing (4 abstentions) | 63% | 0% | 32% | 5% | 0% |
| 3 | Maximum File Size Requirements (3 abstentions) | 55% | 5% | 30% | 0% | 10% |
| 4 | VBP Contract Template (2 abstentions) | 52% | 0% | 29% | 5% | 14% |

Rows may not add to 100% due to rounding.

Infrastructure Opportunity: Substantive Comments and Points of Clarification

| Substantive Comments | Co-chair and CAQH CORE Response |
|---|--|
| Three organizations expressed concern over development and use of a VBP contract template, citing that VBP is progressive, fast-moving and innovative. A template may not contemplate all business scenarios. | 1. FOR DISCUSSION : The intent of a VBP Contract Template would not be to inhibit program innovation or iteration. Instead, the intent of a contract template is to provide a template that could help the industry with predictable and reproducible implementations, similar to how the CORE Master Companion Guide Template defines a flow and format to support EDI implementations. The template would not seek to override proprietary methodologies. |

| Point of Clarification | Co-chair and CAQH CORE Response |
|--|--|
| 2. One organization expressed concern over maximum file size requirements, requesting more information about what this would entail to better gauge support. | 2. CAQH CORE refers to attachment operating rules that contain this requirement. In those rules, CAQH CORE and its participating organizations noted unnecessary rejections of submissions because file sizes were too large. An operating rule requirement compelled health plans to accept a higher maximum file size to avoid rejections. Given the sometimes-extensive reporting requirements in VBP, this requirement could be co-opted to support more streamlined submissions between providers and health plans. |
| 3. One organization expressed desire for clarification of the proposals. | 3. CAQH CORE realizes that additional clarification is necessary when pursuing infrastructure rules. These opportunities were derived from a myriad of existing infrastructure requirements for their potential to be coopted into VBP. The opportunities will be discussed in greater detail at future meetings. |



Prioritization and Support for Semantic Interoperability

| | Support for Rule Development Opportunities for Semantic Interoperability | | | | | |
|----|--|---------|-------------------|---------|-----------------------------|----------------|
| | Opportunity | Support | Partially Support | Neutral | Partially Do Not Support | Do Not Support |
| 1 | High-level Definition (4 abstentions) | 74% | 16% | 11% | 0% | 0% |
| 2 | When Definitions are not Applicable* (4 abstentions) | 68% | 16% | 16% | 0% | 0% |
| 3 | Minimum Inclusion Requirements (4 abstentions) | 58% | 21% | 21% | 0% | 0% |
| | Fulsadia Ossa | | | | | |
| 4 | Episodic Care (2 abstentions) | 76% | 10% | 14% | 0% | 0% |
| 5 | Payment (2 abstentions) | 81% | 5% | 14% | 0% | 0% |
| 6 | Risk Adjustment / Stratification (3 abstentions) | 75% | 10% | 15% | 0% | 0% |
| 7 | Patient Attribution / Assignment (2 abstentions) | 71% | 14% | 14% | 0% | 0% |
| 8 | Quality / Outcome Measurement (2 abstentions) | 71% | 14% | 14% | 0% | 0% |
| 9 | Population Health Program (2 abstentions) | 71% | 14% | 10% | 5% | 0% |
| 10 | Inclusion / Exclusion (2 abstentions) | 71% | 14% | 14% | 0% | 0% |
| 11 | Patient (3 abstentions) | 75% | 5% | 15% | 5% | 0% |
| 12 | Participant (3 abstentions) | 70% | 10% | 20% | 0% | 0% |

Rows may not add to 100% due to rounding.



Semantic Interoperability: Substantive Comments and Points of Clarification

| Substantive Comments | Co-chair and CAQH CORE Response |
|--|--|
| Two organizations suggested CAQH CORE consider existing work in this space to ensure industry alignment. | AGREE: The Subgroup will not duplicate but may build on existing work. Common definitions have been consistently identified as a pain point through environmental scanning and research since CAQH CORE released its initial report on value-based payments in 2018. |
| 2. One organization suggested splitting quality measurement between outcomes and processes, and further recommended adding terms for remote patient care (e.g., telehealth); types of models; financial outcomes (e.g., penalties, bonuses), and provider. Another organization advocated for the definition of value-based reimbursement, care and payments. Yet another organization encouraged alignment of terms that are used in different context outside of value-based care. | 2. FOR DISCUSSION : Additional refinement and additions to the definition lists are necessary and will be explored by the Subgroup as we advance further into rule and content development. |

| Point of Clarification | Co-chair and CAQH CORE Response |
|--|---|
| 3. One organization submitted that this should be at the discretion of the health plans. | 3. The intent of defining these terms is not to override proprietary methodologies but rather to unify industry around a common vernacular for common terms in VBP, a point identified by industry stakeholders as a frequent challenge in CAQH CORE's environmental scanning and research. |
| 4. One organization submitted detailed feedback about the example definition for patient attribution that was used to illustrate the concept of the semantic interoperability framework on the straw poll. | 4. This feedback will be taken it into consideration as the Subgroup seeks to finalize definitions for patient attribution. |



Summary of Go-Forward Opportunities

| Broad Support | Support, with Considerations | Need Clarification/Uncertain | Low Support |
|--------------------|---------------------------------|---------------------------------|--------------------|
| Race and ethnicity | Gender Identity | Sexual Orientation | Citizenship Status |
| Preferred Language | Plan Member Reporting | Infrastructure Requirements | |
| Marital Status | ALL claims use-cases | | |
| | ALL semantic interoperability | | |

Key insights

- Accepted vocabulary and standards should be incorporated into rulemaking – perhaps with edits.
- We need a compelling case to collect and exchange sensitive information.
- Subgroup should not undertake activities that could lead to misuse of sensitive information.
- Points of clarification are needed for topics outside of X12 834 – will begin with Claims Submission today.



Potential Operating Rule Requirements

X12 834 Benefit Enrollment and Maintenance
X12 Plan Member Reporting

Recap of Socio-demographic Data Variance

Demonstrating business need for uniformity using the HIPAA-mandated X12 834

Race and Ethnicity

Limitations of X12 v5010 Standard

- Situational usage.
- Coding incompatibilities.
- "Rolled-up" categories.

Limitations of CDC Race and Ethnicity

- Limited industry uptake.
- Hierarchical and UID code confusion.
- Extremely comprehensive.

Potential Solution

Develop operating rule requirements that require the exchange of race and ethnicity data using unique identifiers included in the CDC Race and Ethnicity Code Set. Align industry around a minimum set of concepts.

Gender Identity

Limitations of X12 v5010 Standard

- Uses non-comprehensive concepts
 - Female
 - Male
 - Unknown

Limitations of USCDI v3 Standard

- Multiple USCDI versions.
- References multiple standards.
- Requires use of free-text in X12.

Potential Solution

Develop operating rule requirements that support enhanced exchange of self-reported gender identity concepts using a combination of structured and reference fields in the X12 834 transaction.

Sexual Orientation

Limitations of X12 v5010 Standard

- Completely unstructured.
- Reportable in REF segments.
- Not currently in standard.

Limitations of USCDI v3 Standard

- Multiple USCDI versions.
- References multiple standards.
- Variable privacy/consent rules.

Potential Solution

Utilize mutually defined 'REF' data segments in the X12 834 transaction to support the exchange of self-reported sexual orientation, potentially helping to fulfill emerging regulatory requirements.

Other data concepts, such as member preferred language, can be collected solely using structured fields in X12 834.



Operating Rules Advance the Exchange of Socio-demographic Information

Business rules leverage existing structures and industry priorities

Observed variation around the collection and exchange of race and ethnicity and other socio-demographic data justifies the development and publication of operating rules for the HIPAA-mandated and voluntary X12 834 transactions.

Best Practices

Industry best practices for data collection exist but are not uniformly implemented across stakeholders.

Capable Standard

An accepted standard accommodates collection and exchange of best practice data and code sets.

Industry Support

Collection of social information is an industry priority and empowers future VBP initiatives that improve and streamline healthcare for all.

Summary Opportunities for Rule Development

HIPAA-mandated X12 834: Benefit Enrollment and Maintenance

| | High-level Requirements | Application in X12 v5010 |
|---|---|--|
| Collection and exchange of Race and Ethnicity Data | Collection of race and ethnicity data as two questions data. Use of unique identifier CDC Race and Ethnicity Code Set. | Loop 2100A - Member Name DMG – Member Demographics DMG05-01 thru 03 Multiple instances up to 10x repeat |
| Collection and exchange of marital status and preferred language | 3. Require collection of structured demographic fields in X12.4. Align reporting of member language with ISO 639. | Loop 2100A - Member Name DMG – Member Demographics DMG04 LUI – Member Language LUI01 & 02 |
| Collection and exchange of sexual orientation and gender identity (SOGI) data | 5. Collection of SOGI using elements of USCDI vocabulary standards.6. Use combo of structured and mutually defined reference fields. | Loop 2100A - Member Name DMG – Member Demographics DMG03 (Gender only) Loop 2750 – Reporting Category REF – Reporting Category Ref REF01 & 02 |

Option to NOT DISCLOSE must be available to all members



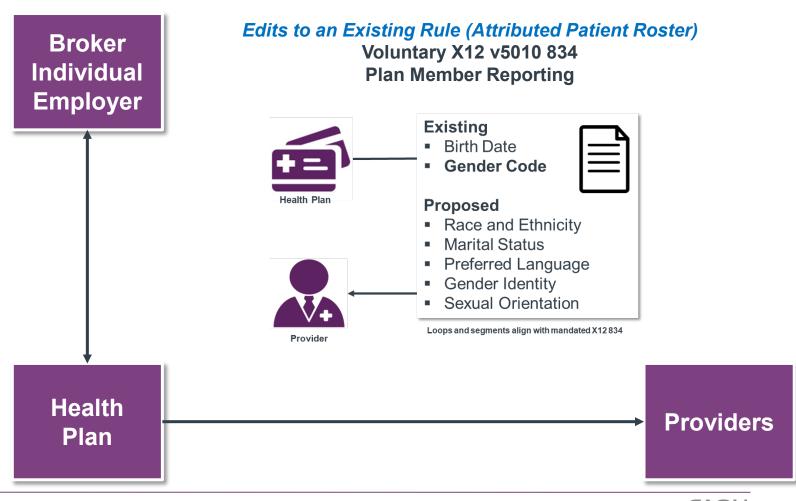
Closing the Data Exchange "Loop" in the X12 834

Leveraging voluntary X12 834: Plan Member Reporting

CAQH CORE Operating Rules can assist in making socio-demographic information actionable in VBP contracts.

HIPAA-mandated X12 v5010 834 Enrollment / Disenrollment / Maintenance Existing Variable Proposed Race and Ethnicity Marital Status Preferred Language Gender Identity Sexual Orientation Loops and segments align with mandated X12834

Creation of a New Rule





Legality of Collecting & Exchanging Socio-demographic Information

Collection of sensitive information must conform to regulation...and common sense

SOGI Data

Concerns about privacy

- SOGI data is a federal-level priority (<u>Executive</u> Order 14075).
- Collection is advantageous, but privacy requirements are ambiguous.
- There is no blanket federal law outlining permissible collection and exchange of SOGI data and state statutes are variable.

Race and Ethnicity Data

Legal and encouraged

- No federal restrictions for health plans to request, collect or exchange race and ethnicity.
- Only 6 states prohibit collection of race and ethnicity as part of an insurance application.
- Collection of this information may complement other initiatives, such as EEO.

Respectful and consistent usage is imperative to populations impacted by collection and exchange.

Outstanding Questions and Discussions

Straw Poll #2 to will confirm DRAFT data content requirements

The second straw poll will address specific rule requirements.

The Subgroup must decide what additional information should be contemplated, in alignment with best practice collection, exchange, and use of the information.

Three Pillars of Socio-Demographic Data Exchange

| Standardized Collection | Standardized Exchange | Standardized Use |
|--|---|---|
| Consistent expectations for contents and timing of point-of-enrollment collection. | Uniform data elements used to communicate collected information. | Incorporation of actionable information to strengthen value-based care reports. |
| Statement on forms and companion guides detailing permissible use. | Alignment around data sets and information that can be used regardless of standard. | Predictability of when health plans share information for consumption. |

- 1. Is there a need to indicate **how data was** collected?
- 2. How **frequently** must information be collected?
- 3. How can an operating rule control for **misuse**?
- 4. What **minimum standards** should collection conform to?



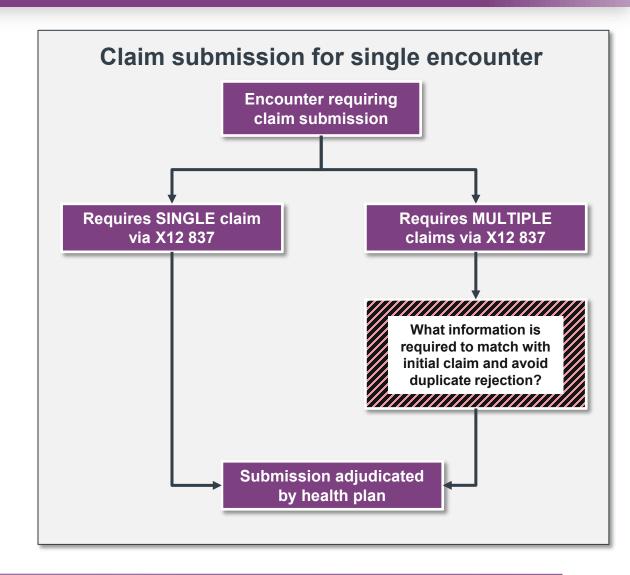
Potential X12 837 Rule Requirement

Standard Submission of Additional Diagnoses for a Single Encounter

Mechanisms of Reporting Supplementary Diagnoses

Supplemental diagnoses support VBP methodologies, coordination, and documentation

- Chronic conditions, factors influencing healthcare, and social determinants of health influence treatment decisions and support administrative components of value-based care programs.
- Diagnostic information can be de-prioritized on an X12 837 claim submission because other clinical factors are either more important or more relevant to the clinical presentation.
- Non-inclusion of supplemental diagnoses on claims is perpetuated by limited diagnosis fields on the CMS-1500 / X12 837.
- Standard pathways for the submission of additional claims that include supplementary diagnoses accommodates collection of important clinical and social conditions.





Interaction of Health Care Claims and VBP Subgroups

Collaboration to ensure operating rule language is complete and inclusive of business scenarios

The VBP Subgroup will review technical requirements and establish standard use-cases.



Health Care Claims Subgroup

- Establish technical requirements for additional claim submission.
- Indicate best practice implementation into the structure of the X12 Standard.

In addition to...

 Other use cases within the X12 837 and data content for X12 277CA.



VBP Subgroup

- Identify VBP use-cases that benefit from additional claim submission.
- Develop industry-standard definitions for VBP usecases.

In addition to...

 Streamlining point-ofenrollment data collection and administration of VBP programs.



Variation in How Supplementary Diagnoses are Submitted

Submission of greater than 12 diagnoses for a single encounter requires an additional claim

Health plans support the submission of additional claims to include supplemental ICD-10 diagnosis codes when the number of codes on an initial claim exceeds 12.

Implementation is not uniform, potentially leading to manual intervention or confusion among stakeholders.

| | X12N 837-P | | Other |
|------------------------|---|--|-----------------------------|
| Data Submission | Health Plan A | Health Plan B | Health Plan C |
| Initial Claim | - | Must include E/M CPT code | |
| | Member | | |
| Supplementary Claim | Billing Provider | | |
| Match to Initial Claim | Match to Initial Claim Rendering Provider Original claim number | Onginal daim number | Employe proprietory formate |
| | Dates of Service | | |
| Procedure Code | 99499 | 99080, if accepted, 99499, if not | Employs proprietary formats |
| Amount | \$0.00 or \$0.01 | \$0.00 or \$0.01 | |
| Claim Frequency | '1' to indicate original | '0' to indicate non-payment | |
| Primary Diagnosis | - | One clinical ICD-10 from initial claim | |
| Supplemental Diagnosis | - | Document in positions 2 through 12 | |

Generally, supplemental claims must be submitted within accepted timelines (180 days) and be supported by documentation in the medical record.

Information Included to Match an Additional Claim

Information is relatively consistent, but implementation varies

Matching

What information is necessary to match an additional claim to an initial claim submission?

Service Limitations

Can or should additional claims only be submitted for select services or product lines?

Procedure Code

What CPT must be included on additional claim to differentiate from unique encounter?

Frequency Code

Should a specific claim frequency code be used or is it situational relative to submission?

Principal Diagnosis

How are inappropriate principal diagnoses included on an additional claim?

Health Care Claims are a Basis for Value-based Methodologies

Additional claim pathways benefit performance and care coordination

Risk **Adjustment** Risk adjustment models often leverage chronic conditions that may not be immediately applicable to the current clinical presentation.

Example Hierarchical Condition Categories:

E11.9 - Type 2 Diabetes Mellitus w/o complications.

Attribution

ICD-10 defined conditions can be used for attribution or reconciliation in episodic or specialty care models when targeting a specific patient population.

Example Medicare Oncology Care Model:

C30.xx - Malignant neoplasm of nasal cavity or middle ear. Payment / **Incentives**

Quality

ICD-10 codes can be used to document conditions or services whose reporting leads to physician incentives through pay-for-reporting or pay-for-performance.

Example HEDIS Adult BMI Assessment:

Z68.51 - BMI < 5th percentile for age.

ICD-10 diagnoses are often used to identify applicable cohorts and outcomes of interest in the quality measures used in value-based care programs.

Example **Complications** following THA/TKA:

T84.033D - Mechanical loosening of internal left knee prosthetic joint, subsequent encounter.

Non-medical **Factors**

ICD-10 codes can document social risks and other non-medical factors that influence care, empowering care coordination helping quantify social risks

Example ICD-10 Zcodes for social risk:

Z59.1 – Inadequate housing.

Measurement





Next Steps

X12 834 Data Content

- Straw Poll #2: CAQH CORE send Straw Poll #2 via email on Monday, May 22 including detailed requirements for an X12 834 data content operating rule.
 - > Will contain *initial* detailed requirements for benefit enrollment and plan member reporting operating rules.
 - > Please begin engaging with your **EDI experts** to submit a response.

X12 837 Data Content

- Awaiting technical direction from the Health Care Claims Subgroup.
- VBP Subgroup will refine language and perform a secondary evaluation of technical requirements.

Next meeting

- June 8, 2023 from 2pm-3:30pm ET



Appendix



Today's Call Documents

Document Name

Doc 1 VBP Subgroup Call 2 Deck 05.18.2023

Doc 2 VBP Subgroup Call 1 Call Summary 04.27.2023

| CORE Staff* | Email Address |
|-------------------------------------|--------------------|
| Erin Weber, VP, CORE | eweber@caqh.org |
| Michael Phillips, Sr. Manager, CORE | mphillips@caqh.org |
| Kayla Cooper, Associate, CORE | kcooper@caqh.org |

CAQH CORE VBP Subgroup

Activity Schedule for Call 1 and 2

| Work Group Activity | Date | Topic |
|---|--|---|
| Subgroup Call #2 TOPIC(S): Benefit Enrollment & Claims Transactions | Thursday 5/18/2023 2:00 – 3:30 PM ET | Review results of Straw Poll #1. Review detailed benefit enrollment rule requirements. Introduce health care claims transaction. Next Steps including RWG Straw Poll #2. |
| Straw Poll #2 TOPIC(S): Benefit enrollment and health care claims | Monday 5/24/23 – Thursday 6/4/23 | Indicate level of support for detailed benefit enrollment data content rule requirements. |
| Subgroup Call #3 TOPIC(S): Benefit Enrollment & Claims Transactions | Thursday 6/8/2023 2:00 – 3:30 PM ET | Review results of Straw Poll #2. Refine benefit enrollment rule requirements. Introduce infrastructure requirements, if indicated Review detailed claims requirements Next Steps including RWG Straw Poll #3. |
| Straw Poll #2 TOPIC(S): Health care claims and infrastructure requirements | Monday 6/12/23 – Thursday 6/22/23 | ■ Indicate level of support for claims and infrastructure operating rule content |

CAQH CORE will update content as agenda clarifies between calls

CAQH CORE Value-based Payments Subgroup

Roster

| Elyse Pegler | |
|------------------|--|
| LIYSC I CBICI | Aetna |
| James Murray | Aetna |
| Alka Acari | Aetna |
| Terry Cunningham | AHA |
| Andrea Preisler | AHA |
| Linda Walsh | AMA |
| Laura Scott | AMA |
| Heather McComas | AMA |
| Robert Otten | AMA |
| Nancy Spector | AMA |
| Erica Martin | AMA |
| Era Rodriguez | Arizona Health Cost Containment System |
| Danielle Vincent | Aultcare |
| Jacob Boron | Aultcare |
| Kathy Sites | Availity |
| Health Sammons | BCBS NC |
| Troy Smith | BCBS NC |
| Natasha Sallie | BCBS MI |
| Ron Knapp | BCBS MI |
| Carol Larson | BCBS MI |
| Cynthia Monarch | BCBS MI |
| Jack Green | BCBS MI |
| Susan Langford | BCBS TN |
| Chuck Chervitz | CMS |
| Charlene Parks | CMS |
| Sadaf Ali | CMS |
| Mike Denison | Change Healthcare |
| Summerpal Kahlon | Change Healthcare |
| Annette Kemplin | CIGNA |
| Jeff Narog | CIGNA |
| Gunes Raack | Cleveland Clinic |
| Scott Dynda | Cleveland Clinic |
| Michelle Medina | Cleveland Clinic |
| Robert Jones | Cleveland Clinic |
| Adam Keating | Cleveland Clinic |
| Sanjeev Suri | Cleveland Clinic |

| Participant | Title and Organization |
|------------------------|---------------------------|
| Kyle Kroenig | Cognizant |
| Tania Mason | Cognizant |
| Vincent Carrillo | Cognizant |
| Andrew Schulz | Cognizant |
| Patricia Wijtyk | Cognizant |
| Kevin Day | Edifecs |
| Vik Sachdev | Edifecs |
| Tushar Nair | Edifecs |
| Anitha Aerabati | Elevance Health |
| Joe McGuire | Epic |
| Megan Soccorso | Gainwell Technologies |
| Rashmi Bokkasada | HealthEdge |
| Parag Desai | HealthEdge |
| Gheisa-Ly Rosario Diaz | LabCorp |
| Linda Jaeger | LabCorp |
| Denny Brennan | MHDC/NEHEN |
| David Delano | MHDC/NEHEN |
| Janice Karin | MHDC/NEHEN |
| Kenia Cruz | Montefiore |
| Charles Hawley | NAHDO |
| Amy Costello | NAHDO |
| Margaret Weiker | NCPDP |
| Nancy Team | NextGen |
| Alison Schambach | Tata Consultancy Services |
| Pinki Patel | Tata Consultancy Services |
| Dorothy Egan | Tata Consultancy Services |
| Mary Sussman | Tata Consultancy Services |
| Brian Petry | TRICARE |
| Dawn Erckenbrack | TRICARE |
| Kiran Kalluri | UnitedHealthGroup |
| Lynn Chapple | UnitedHealthGroup |
| Robert Tennant | WEDI |
| Kristina Berger | Zelis |

