

CAQH Committee on Operating Rules for Information Exchange (CORE) – Code Combinations Task Group

Task Group Rationale for *Task Group Follow-up Straw Poll on Potential Compliance-based Adjustments to the CORE Code Combinations v3.9.1 June 2025*

Rationale Background

At its August 5th call, the CORE Code Combinations Task Group reviewed the results of the *Task Group Initial Straw Poll on Potential Compliance-based Adjustment to the CORE-required Code Combinations for CORE-defined Business Scenarios v3.9.1 June 2025*. Based on the Initial Straw Poll results and the Task group's consensus reached on the call, the Task Group accepted three Compliance-based adjustments to the CORE-required Code Combinations v3.9.1, *June 2025*. (see the Call Summary for the August 5th Task Group call [here](#).)

On the call, the Task Group also agreed to conduct a Compliance-based Review (CBR) Follow-up Straw Poll (FSP) to obtain participant feedback on three code combinations written-in by Task Group Participants. Task Group Participants were asked to submit any **RATIONALE** in support or not in support of the addition of each code combination. The *Task Group CBR Follow-up Straw Poll Rationale Submission Period* opened on Thursday, August 7, and closed on Friday, August 15. CORE received rationale from 52% of active CCTG participating organizations. Active participants attend most Task Group calls and respond to most Task Group Straw Polls, or are new members of the Task Group as of 2025. A summary of respondents is included in **Table 1**.

Table 1: Summary of Respondents to July 2025 CBR FSP Rationale Submission Form by Stakeholder Type

Stakeholder Type	25 (52%) Respondents
Total # of Responses	13 (100%)
Number of Health Plan/Health Plan Association Responses	2 (15%)
Number of Provider/Provider Association Responses	2 (15%)
Number of Vendor/Clearinghouse Responses	5 (38%)
Number of Government Responses	2 (15%)
Number of Other Stakeholder Type Responses	2 (15%)

Note: Percentages may not add up to exactly 100 due to rounding.

Code Combinations Proposed by CCTG Participants Included in the Follow-up Straw Poll

Task Group Participants proposed for the July 2025 Compliance-based Review (CBR) Follow-up Straw Poll to include:

- **3** code combinations written-in on the July 2025 CBR Initial Straw Poll (ISP) by CCTG Participants.

Descriptions of these code combinations are included in **Table 2**. The descriptions include rationale comments submitted by participants for and against their addition to the *CORE Code Combinations*.

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Code Combinations for Addition to be Included in July 2025 CCTG CBR FSP

Table 2: Write-in Code Combinations submitted for inclusion on the July 2025 CCTG CBR FSP with Participant Rationale

Line	Business Scenario	CARC	RARC	ASC X12 CAGC	Support For	Not in Support For
1	3 Billed Service Not Covered by Health Plan	B12 Services not documented in patient's medical records.	N912 Our records indicate that this beneficiary did not elect hospice.	CO or PI	<ul style="list-style-type: none"> Two organizations noted that this combination provides sufficient clarity. One organization explained that RARC912 refers to information typically found in medical records. One organization noted their support for the addition of this combination so that payers can use it. Two organizations noted their general support for this combination. 	<ul style="list-style-type: none"> One organization noted that it is not logical to associate missing services in medical records with a patient not electing hospice.
2	3 Billed Service Not Covered by Health Plan	96 Non-covered charge(s). At least one Remark Code must be provided (may be comprised of either the NCPDP Reject Reason Code, or Remittance Advice Remark Code that is not an ALERT.) Usage: Refer to the 835 Healthcare Policy Identification Segment (loop 2110 Service Payment Information REF), if present.	N915 Predetermination of services is not allowed under the member's plan.	CO, PI or PR	<ul style="list-style-type: none"> One organization noted their support for the addition of this combination so that payers can use it. Two organizations noted their general support for this combination. 	<ul style="list-style-type: none"> One organization suggested CARC 95 (Plan procedures not followed) is a better option for RARC N915, explaining that if payers do not permit any predetermination for a service, it was not provided, and therefore cannot be billed. Two organizations noted confusion regarding predetermination being considered a non-covered charge. One wrote that the CARC and RARC seem contradictory.
3	3 Billed Service Not Covered by Health Plan	299 The billing provider is not eligible to receive payment for the service billed.	N916 The third party will render payment to the provider, and they will reimburse you for covered services.	CO, PI or PR	<ul style="list-style-type: none"> One organization noted their support for the addition of this combination so that payers can use it. Two organizations noted their general support for this combination. 	<ul style="list-style-type: none"> One organization suggested CARC 95 (Plan procedures not followed) is a better option for RARC N916, explaining that this combination indicates payment from another entity other than the health plan. Three organizations commented that this combination does not provide logical information, noting that the CARC indicates that the billing provider is not eligible for payment, but the RARC indicates that they are eligible.

Note: Eight organizations submitted a response to be on record but did not provide a rationale.

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Next Steps

- July 2025 CCTG CBR FSP will open to CCTG Participants on August 25 and close on September 5. Please coordinate within your organization to submit only one response. Please consider the rationale submitted by Task Group Participants while formulating your response.
- Results of the CCTG CBR FSP will be reviewed during the next CCTG call on Tuesday, September 16 from 3:00 - 4:00 pm ET. A Zoom meeting invite and documents will be distributed to the Task Group Participants before the call.
- The *CORE-required Code Combinations v3.9.2 October 2025* inclusive of CCTG-approved compliance-based adjustments will be published by October 1, 2025, to ensure compliance is met.