Rationale Background

During its December 9th call, the CORE Code Combinations Task Group agreed to re-poll 4 code combinations that were submitted during the market-based review period and received requisite support for addition to the *CORE-required Code* Combinations but were flagged by CCTG Participants for perceived CARC and RARC mismatch and potential incompatibility with the CORE-defined Business Scenario. (see the Call Summary for the August 5th Task Group call here.)

These 4 code combinations will be included on the Compliance and Market-based Review (CBR & MBR) Follow-up Straw Poll (FSP) opening on December 22, 2025. To support the review, CCTG Participants were asked to voluntarily submit any **RATIONALE** in support or not in support of the addition of each code combination. A summary of respondents is included in **Table 1**.

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

Number of Active Task Group Participating Entities	25
Total Number of responses	11 (44%)
Number of Health Plan/Health Plan Association Responses	4 (36%)
Number of Provider/Provider Association Responses	1 (9%)
Number of Vendor/Clearinghouse Responses	3 (27%)
Number of Government Responses	1 (9%)
Number of Other Stakeholder Type Responses	2 (18%)

Note: *Active participants are those that have attended most meetings and responded to most CCTG Straw Polls.*

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

Task Group Participants agreed for the November 2025 CBR & MBR FSP Poll to include:

- **4** code combinations identified for repolling on the November 2025 CBR & MBR 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*.

Code Combinations for Addition to be Included in November 2025 CCTG CBR & MBR FSP

Table 2: Code Combinations for Repolling in the November 2025 CCTG CBR & MBR 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	**96** Non-covered Charges	**M122** Missing/incomplete/invalid level of subluxation	CO, PI, or PR	• One organization agreed that this could classify as a non-covered scenario. • One organization highlighted that the inability to verify requirements results in the plan's non-coverage decision. • Another organization submitted support for the code combination.	• Two organizations indicated that CARC 16 is more appropriate, and since this is already in BS2, the CCTG should not improve its inclusion in BS3. • Two additional organizations indicated the appropriateness for this messaging to exist in BS2, not BS3, given its communication of missing or invalid information.

Line	Business Scenario	CARC	RARC	ASC X12 CAGC	Support For	Not in Support For
2	**3** Billed Service Not Covered by Health Plan	**272** Coverage/program guidelines not met	**N521** Mismatch between the submitted provider information and the provider information stored in our system	CO, PI or PR	• One organization agreed that this could classify as a non-covered scenario. • One organization stated that discrepancies between stored provider information and what was submitted on the claim reinforces the non-coverage decision. • Another organization submitted support for the code combination.	• Five organizations highlighted that this is a mismatch of information and belongs in BS2. Two of these organizations extended that the RARC may be more appropriate for pairing with CARC 16. • One organization suggested potentially requesting a new RARC to cover this situation.
3	**3** Billed Service Not Covered by Health Plan	**272** Cover/program guidelines not met	**N819** Patient not enrolled in Electronic Visit Verification System	CO, PI or PR	• Three organizations supported inclusion due to Medicaid and Federal program requirements stating that a patient must be in the EVV system to meet coverage requirements. • One organization agreed this could be a non-covered scenario. • Another organization submitted support for the code combination.	• One organization indicated that there is a mismatch of messaging between the CARC and RARC and that communication referring to the EVV system does not have to do with coverage/program. The submitter believes the RARC does not align to any of the existing business scenarios. • One organization highlighted that this is a billing error and is not an appropriate request under BS3.
4	**3** Billed Service Not Covered by Health Plan	**272** Cover/program guidelines not met	**N820** Electronic Visit Verification System units do not meet requirement of visit	CO, PI or PR	• Two organizations supported inclusion due to Medicaid and Federal program requirements stating that a patient must be in the EVV system to meet coverage requirements. • One organization agreed this could be a non-covered scenario. • Another organization submitted support for the code combination.	• One organization indicated that there is a mismatch of messaging between the CARC and RARC and that communication referring to the EVV system does not have to do with coverage/program. The submitter believes the RARC does not align to any of the existing business scenarios. • One organization highlighted that this is a billing error and is not an appropriate request under BS3. • One organization indicated that this seems to be an error in the units or excess of units and a different CARC would better explain the situation.

Note: *2 organizations submitted forms to go on record, but did not register an opinion.*

CAQH Committee on Operating Rules for Information Exchange (CORE) – Code Combinations Task Group
Rationale for *Task Group Follow-up Straw Poll on Potential Compliance and Market-based Adjustments to the CORE Code Combinations v3.9.2 October 2025*

Next Steps

- November 2025 CCTG CBR & MBR FSP will open to CCTG Participants on December 22 and close on January 9, 2026. 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 & MBR FSP will be reviewed during the next CCTG call on Tuesday, January 20 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 v3.10.0 February 2025* inclusive of CCTG-approved compliance and market-based adjustments will be published by February 1, 2026, to ensure compliance is met.