

## Standards and Operating Rules Maintenance Process

Margaret Weiker  
ASC X12N Chair  
Director, Hewlett-Packard Company



## About ASC X12

---

- Chartered by the American National Standards Institute more than 30 years ago
- Develops and maintains EDI standards, technical reports, and XML schemas which drive business processes globally
- ASC X12 membership includes technologists and business process experts, encompassing health care, insurance, transportation, finance, government, supply chain and other industries.
- For additional information, visit [www.x12.org](http://www.x12.org).

# Benefits of Current Process

---

- Open – anyone can submit a request
- Public – comments and dispositions are posted
- Timing – consistent and well documented
- DSMO requests are vetted via an informed panel
  - DSMO members represent a wide cross-section of the industry
- Multiple entry points – accessibility

# Benefits of Current Process

---

- Consensus driven
- Transparent and documented
- Proven
  - Continue to evaluate and improve
- It Works
  - Over 500 change requests submitted between Version 4010A1 and Version 5010 implementation specifications
  - 641 change requests have been incorporated into the Version 006020™ Technical Report Type 3 documents



# Challenges/Problems of Current Process

---

- Awareness of mechanisms and process for requesting changes
- Requester doesn't clearly communicate the requested change
- Timing
  - Coordination between regulatory authorities and SDOs
- Perception that it takes too long

# Recommendations

---

- ASC X12N committed to working with DSMO to gain efficiencies
  - Support DSMO recommendations
- ASC X12N continues to streamline processes
- Interim Final Rule criteria for operating rules verses standards and TRs is clear, uses language contained in existing documents and incorporates industry input
  - SDO must control data content and business rules required to support the data content in the technical reports
- Effective dates of operating rules must coincide with effective dates of HIPAA mandated transactions

# Recommendations

---

- Operating rule entity must collaborate with SDOs and Data Content Committees
  - Determination of requested modification
  - Adoption **must** follow the existing and established DSMO → NCVHS → HHS processes
- Establish a predictable versioning process to permit planning and budgeting for HIPAA transaction modification as maintenance
- Education and outreach
  - Promote comment periods
  - “How to make a change” advertising

---

# REFERENCE MATERIAL

## SLIDES 9 - 20

# Process – Submitting Modifications

---

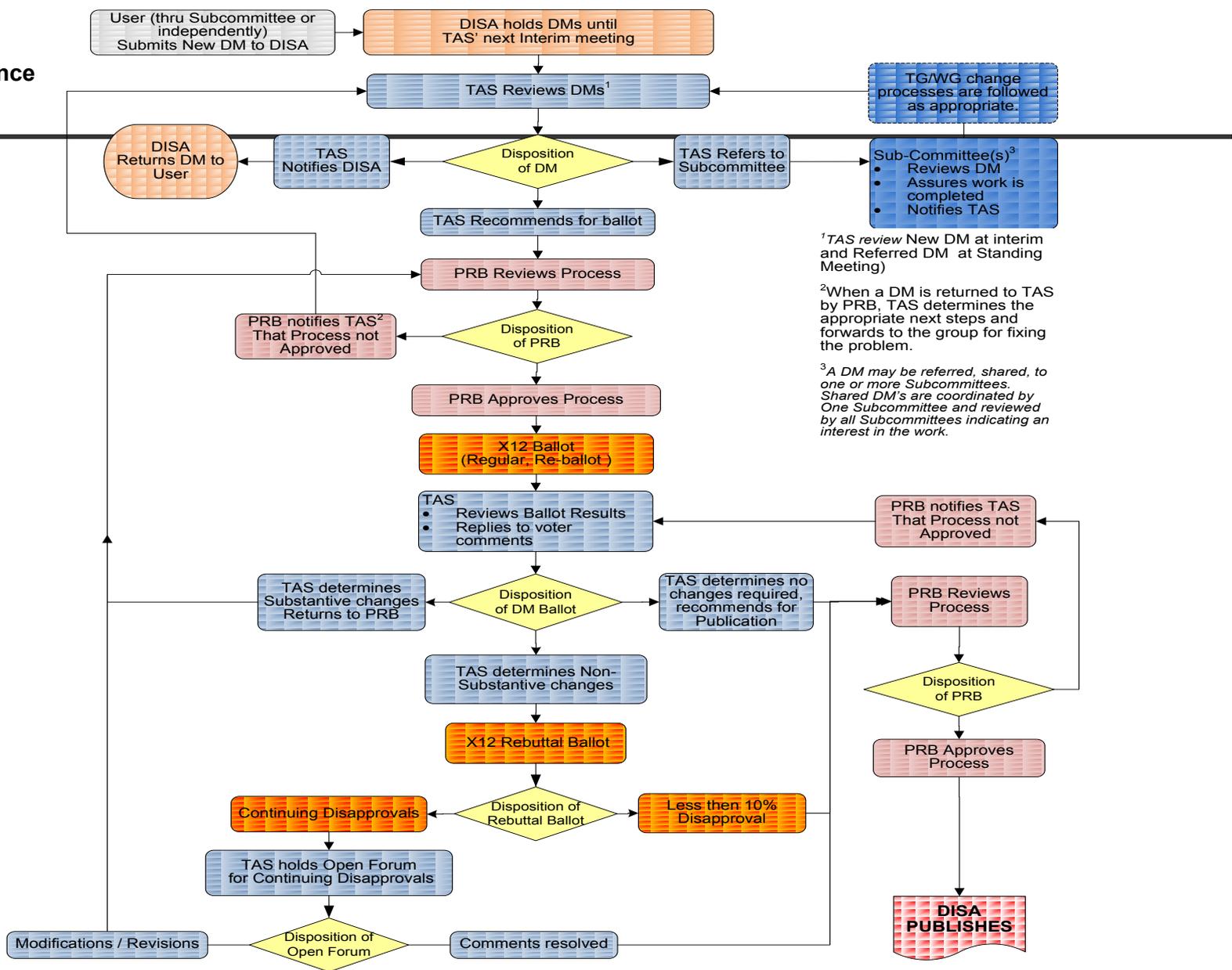
- Direct
  - Project Proposal Request
  - Data Maintenance Request
  - Code Maintenance Request
  - DSMO Request
  - X12 website: <http://www.x12.org/TR3ChangeRequest/>
  - Work Group
  - Email or paper document to Secretariat
- Indirectly
  - Comment from a NPRM or IFR
  - RFI Portal

# Direct Submission: Project Proposal

---

- Project Proposal (PP) form must be submitted by an X12 Subcommittee.  
*Note: A Data Maintenance (DM) form can result in submission of a PP from a Subcommittee*
- **Assignment:** Secretariat assigns tracking number for request
- **Approval:** Procedures Review Board (PRB) approves development  
PRB assigns subcommittees
- **Work:** Work groups conduct work  
Task group and Subcommittee (s) review and approve  
TAS reviews and approves  
PRB reviews process
- **Ballot:** Applicable for standard changes only

# ASC X12 Data Maintenance Process

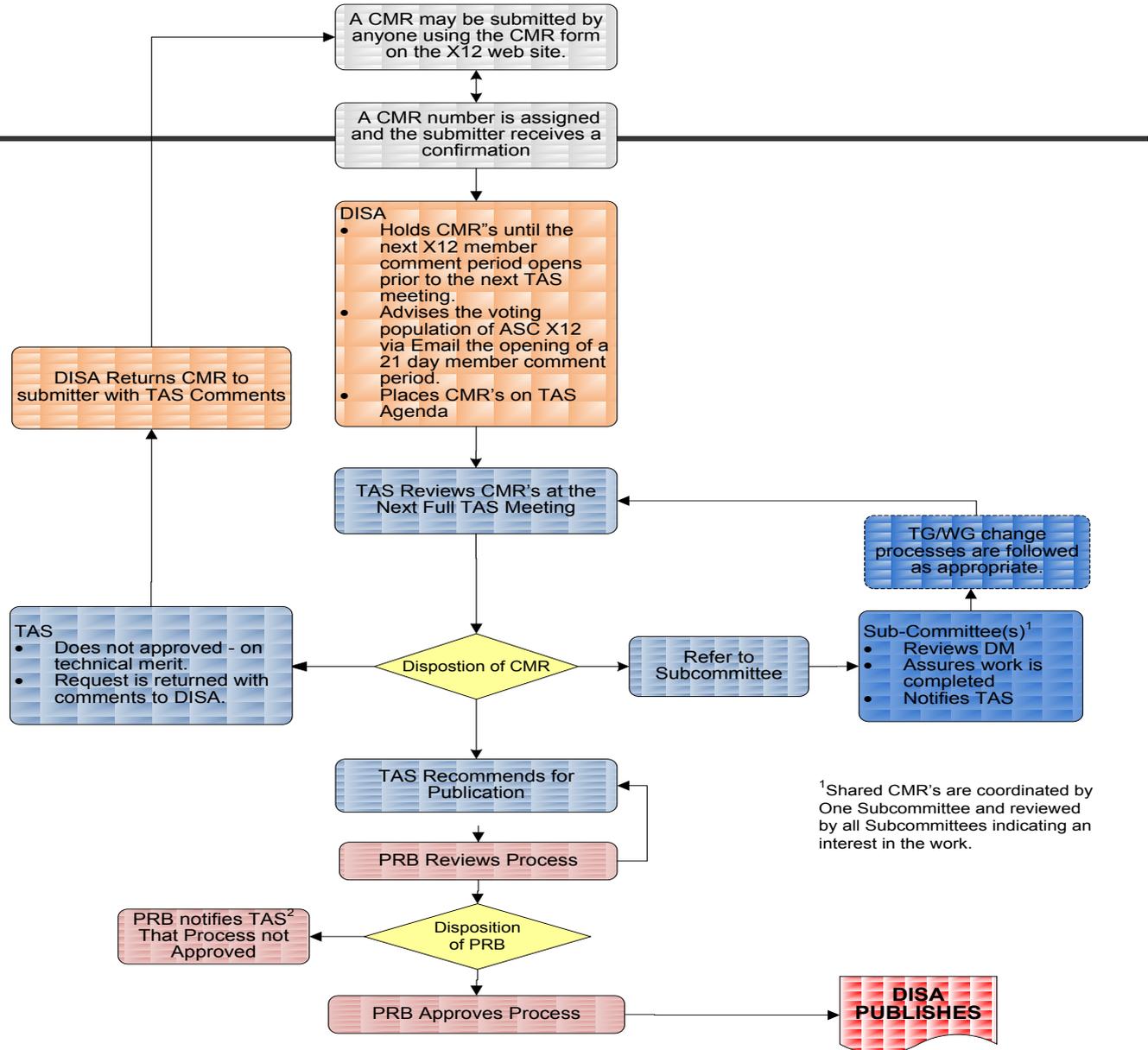


# ASC X12 Code Maintenance Process

The CMR tool is only used for a simple code addition. The proposed code can point to an existing Code Source.

The submitter prepares and submits the CMR according to instructions on the ASC X12 Website:

<http://www.x12.org/x12org/X12Standards/CMR/SubmitterInformation.cfm>



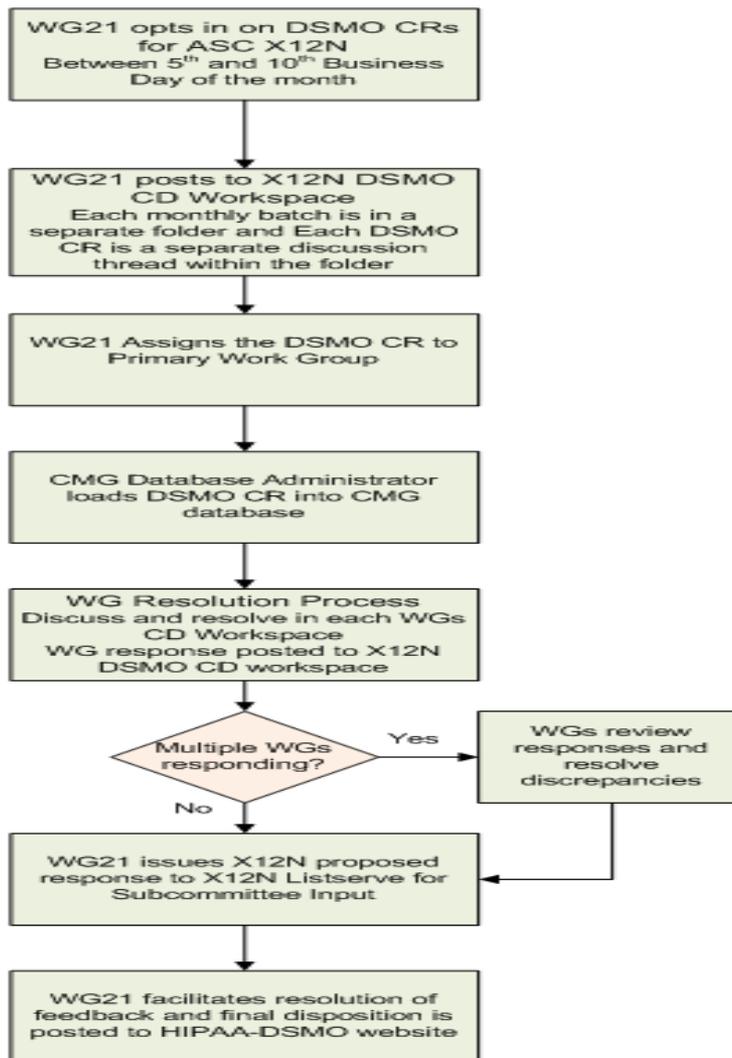
<sup>1</sup>Shared CMR's are coordinated by One Subcommittee and reviewed by all Subcommittees indicating an interest in the work.

# Publication Schedules

---

- X12 Transaction and Code Set Standards
  - Fixed, unvarying schedule
  - Three time-sequences each year
  - Materials published
    - Primary Release ≈ January
    - Sub-releases ≈ March and July
  - <http://x12.org/x12org/subcommittees/dev/PDF/X12RELEASESCHEM.pdf>

# DSMO Request

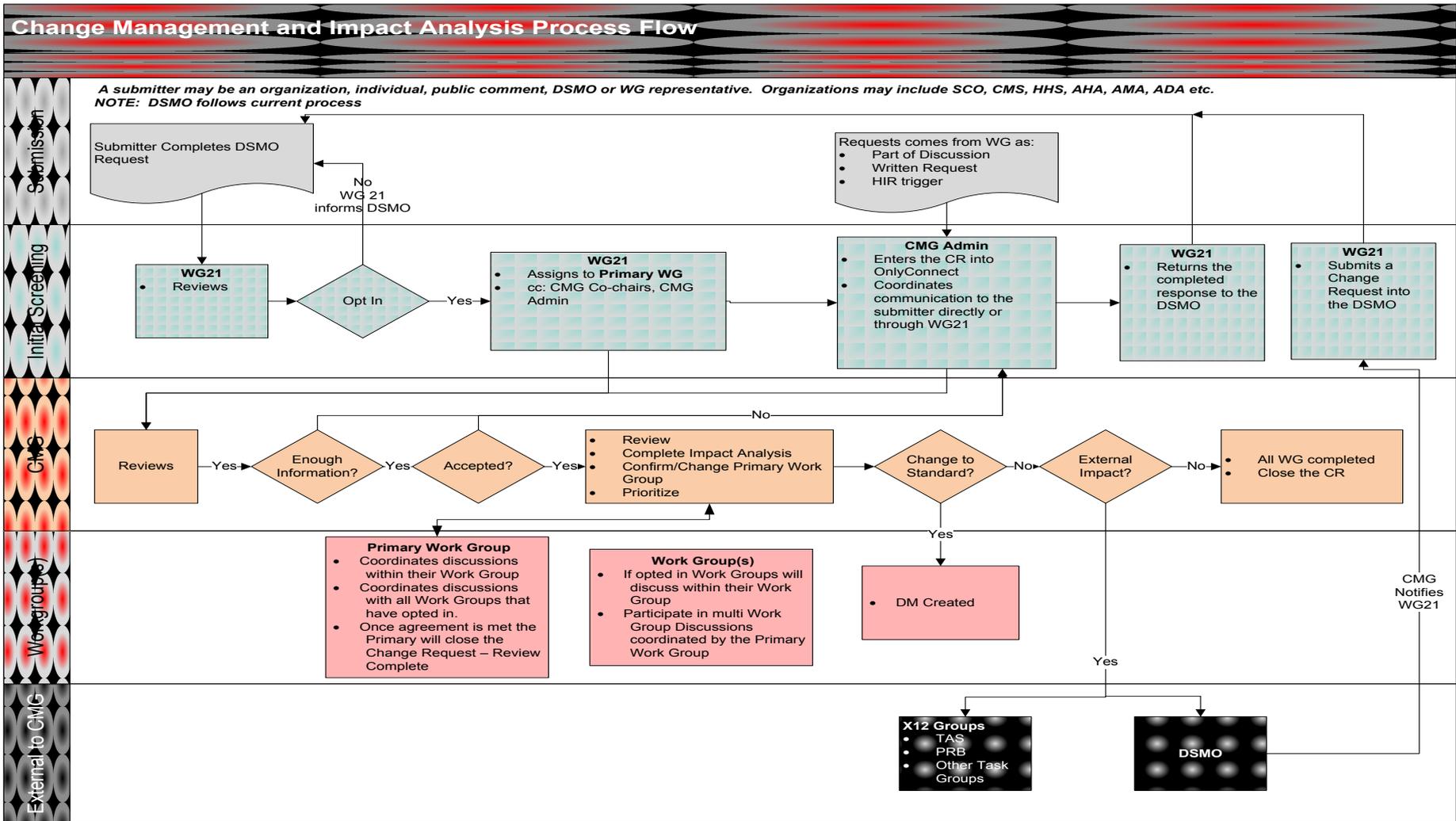


# Direct Submission Process

---

- X12 Website
  - Enter a Change Request:
    - Name, email, organization, phone, business case, suggestion, and indicate applicable TR3
  - Document is generated and fed into the Change Management Group (CMG) process
- Work Group
  - Change Management Group (CMG) process
- Secretariat
  - Determines type of change requested
  - Assigns to appropriate process

# CMG Process



## Indirectly submitted via NPRM or IFR

---

- Follows the Work Group Change Management Group Process

# Indirectly via: Request for Interpretation (RFI)

---

- ◆ Secretariat functions:
  - Receives and documents RFI request
  - Assigns and records RFI number
  - Submits request to appropriate subcommittee
  - Notifies submitter of status
- ◆ Subcommittee or appropriate body functions:
  - If work is accepted, identifies a Project Delegate (has one year from assignment data)
  - Schedules and performs work on RFI
  - Corresponds with submitter for clarification
  - Any standard change follows DM or CMR process
  - Any technical report change follows CMG process
- ◆ Subcommittee presents the RFI and response to TAS for evaluation
- ◆ PRB functions
  - Reviews response and process
  - Approves response
- ◆ Provides Secretariat approved interpretation to submitter

# TR3 (Implementation Guide) and TR2 (Reference Model)

---

- Project Proposal submitted
- WG/Committee begins work
- Cut-off change requests
- Finalize draft document
- WG/Committee vote to approve draft
- Public Comment
- WG/Committee processes comments
- Publish responses to comments
- Informational Forum
- WG/Committee modifies document and performs final review
- Approvals
- Publish

# Communications for Technical Reports

---

- Public announcement of draft technical reports ready for review and comment
  - X12 Listserves
  - Industry groups
  - OESS
  - Press release
- Anybody can comment
- Comments are processed and responses posted
- Informational Forum announced using same methods as original public announcement
  - Forum is a face-to-face and virtual meeting
- Press release announces publication