

# **CLAIM ATTACHMENT STANDARDS and OPERATING RULES**

## **WEDI Testimony to NCVHS Subcommittee on Standards November 17, 2011**

Presented by  
Don Bechtel  
WEDI Chair  
Patient Privacy Officer  
Siemens Health Services

## What is WEDI?

- ◆ **Workgroup for Electronic Data Interchange**
  - Established 1991
  - Named advisor to HHS under HIPAA
  - Represents broad cross-section of healthcare industry
  - Objective collaborative approach to addressing issues

## Summary observations

### ◆ Main Points

- SDOs write business rules for data content and usage
- Operating Rule entities write operational business rules not associated with data content
- Claim Attachments need to be implemented to reduce costs and time to process claims benefits providers and payers
- Need acknowledgements too
- Developing SDOs are harmonizing standards together today
- Many meaningful use documents will be useful to health plans as claim attachment, and can be shared in the same format
- Need to support the Patient Information Unstructured Content
- WEDI can be a valuable agent identifying new or modified requirements for Claim Attachment standards and operating rules

**What is the current status of development of standards for attachments and implementation specifications? What is the timing for development and testing standards?**

- ◆ WEDI defers to the SDOs for specifics on this point, although we do understand that:
  - The ASC X12 275 and 277 transactions v5010 are ready
  - HL7 Attachment –Information Specifications for CDA Release 2 are near completion
  - Two pilots were done
    - Earlier pilot used CDA Release 1 and PDF documents (Empire)
    - Second pilot used CDA Release 2 (Mayo and WPS)
    - There is a pilot running now at UHIN for Prior Authorization
  - Both the Empire and Mayo/WPS pilots have demonstrated positive returns to both the provider and payers
    - Reduces cost and time to payment

## Where do you see the standards for attachments going? How are these standards being harmonized with the standards developed/adopted for exchange of clinical information under the Meaningful Use program?

- ◆ Claim Attachments will continue to be needed
  - New attachment types, many are already identified
  - Use with Authorizations and Referrals
- ◆ Harmonization between standards
  - Is currently being done between the SDOs
  - Has been a joint effort between X12, HL7, NCPDP, DeCC
- ◆ Other uses with Meaningful Use and ...
  - The actual attachment information in the BIN Segment being a CDA allows for a variety of uses
  - Is consistent with document exchanges defined for MU today
  - Use of CDA Templates offers future opportunities
  - Use of Unstructured Documents, e.g., PIUC or CDA with unstructured documents defined by Consolidated Guide & LOINC

Are all the “priority” areas identified by provider and payers being addressed in the development of the standards?

## ◆ High priority areas

- It would seem that 80% of the high priority items have been identified
- During our Fall Conference attachment types were identified that would be most useful; many among those are already defined:
  - Lab Results
  - X-Ray Report
  - Sterilization Forms
  - Information on Modifiers
  - OB Claims supporting doc
  - Discharge statements
  - Emergency Room Records
  - Care Plans (medical home)
  - Progress Reports (Rehab)
  - First Report of Injury (W/C)

Which areas might not be addressed? What other gaps have been identified? How can those gaps be addressed?

- ◆ Areas not addressed and how to address them
  - Suggest the use of the PIUC
    - Add LOINC codes to support new needs without changing the standards
    - Unstructured documents can be a short term solution
      - Allows an opportunity to learn more about requirements
      - Can be used while a structured CDA can be developed
      - A good stop gap tool to consider for adoption for this purpose
    - Pharmacy and Dental requirements
  - Future requirements – claim vs attachment
    - Needs an industry process
    - WEDI could play a valuable role in this work

## What is the current status of common business rules (operating rules) for the requirement or submission of attachments in the industry?

- ◆ Currently there are no Operating Rules other than the Implementation Specifications defined by X12 and HL7
  - These business rules primarily define data content rules
  - Operational rules are missing
  - Acknowledgements (999, 277 and 824)
- ◆ For HIEs and NwHIN and DSNs we are seeing the equivalent of operating rules for document exchanges that might include attachment types
  - Direct and IHE



What are the areas where national standard business rules/operating rules for requiring/submitted attachments would be most beneficial?

## ◆ National Operating Rules

- Would be helpful in defining operational business rules
  - Communication protocols
  - Security requirements
  - Hours of operation
  - Other business rules not associated with data content or data structure
    - Define when claim attachments should be sent or not sent
    - Help with the timing of solicited versus unsolicited attachments



**One of the responsibilities of the Committee is to identify an authoring entity for national operating rules for claim attachments; would you be pursuing designation as an authoring entity?**

- ◆ WEDI is not pursuing the designation of an authoring operating rule entity
- ◆ WEDI believes it can provide a valuable role to the SDOs and the Operating Rules entities by:
  - Bringing the industry together for topic forums
  - Identifying areas needing attention
  - Providing outreach and education on implementation
- ◆ Whoever the entity is for Claim Attachments
  - They must be collaborative and work together with the SDO
  - The SDOs and the Operating Rule Entities must have a delineation of responsibilities to avoid conflicting rules

## Closing

- ◆ Thank you for the opportunity to testify
- ◆ WEDI offers our support
- ◆ WEDI web site: [www.wedi.org](http://www.wedi.org)
- ◆ My contact info:  
[donald.bechtel@siemens.com](mailto:donald.bechtel@siemens.com)