

Standards and Operating Rules Maintenance Process

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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.

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

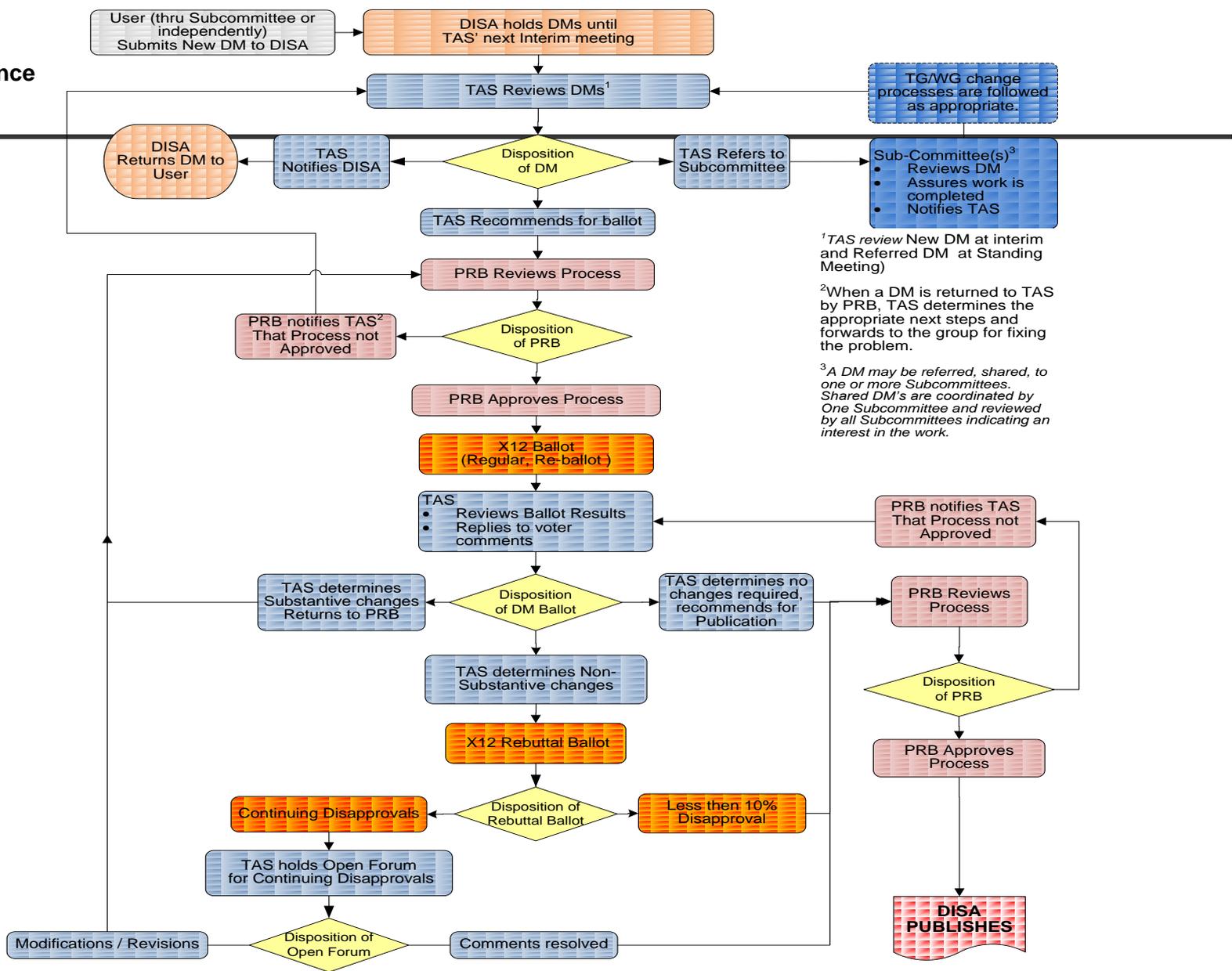
Process – Submitting Modifications

- 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

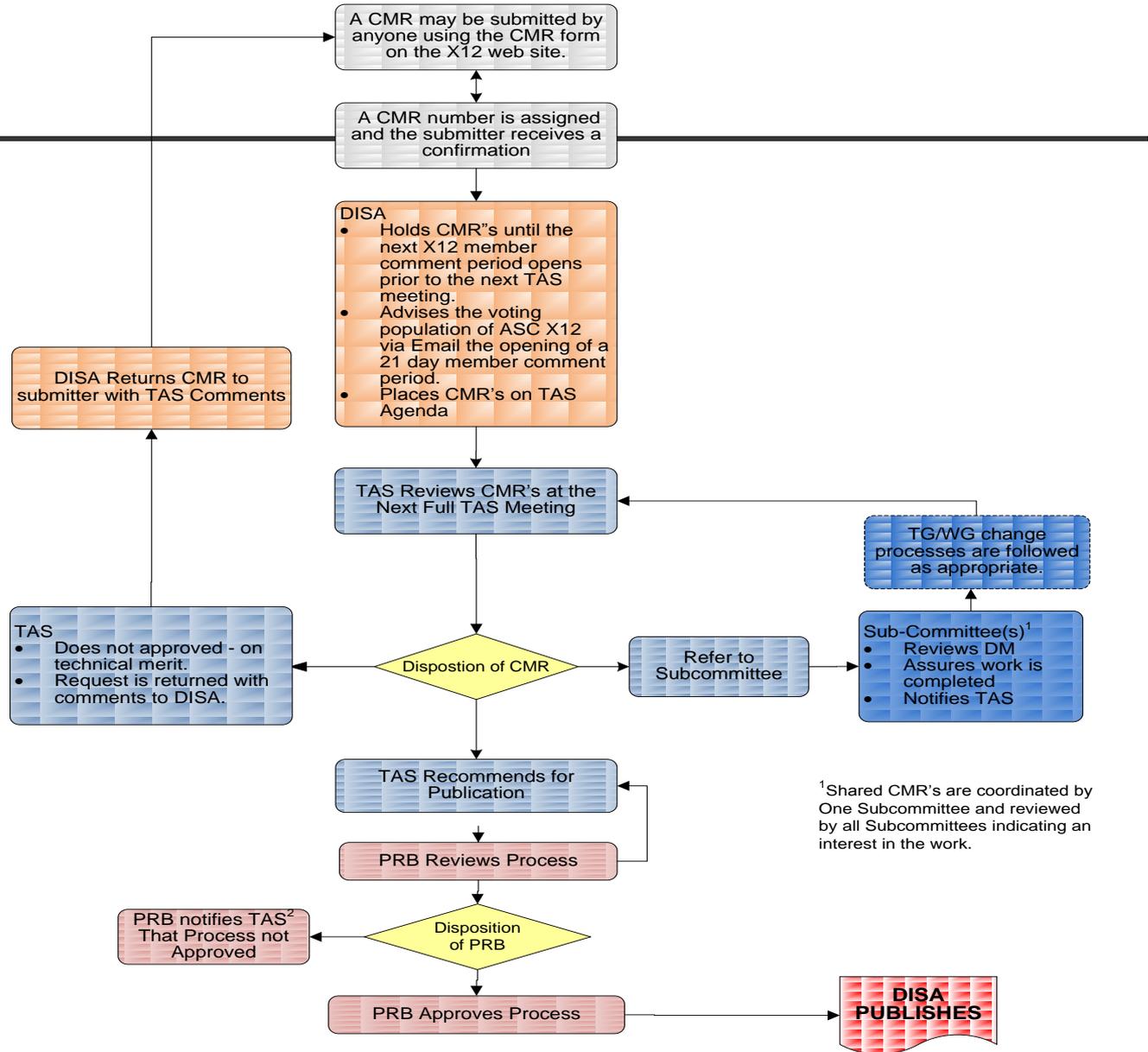


ASC X12 Code Maintenance Process

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>



¹Shared 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>

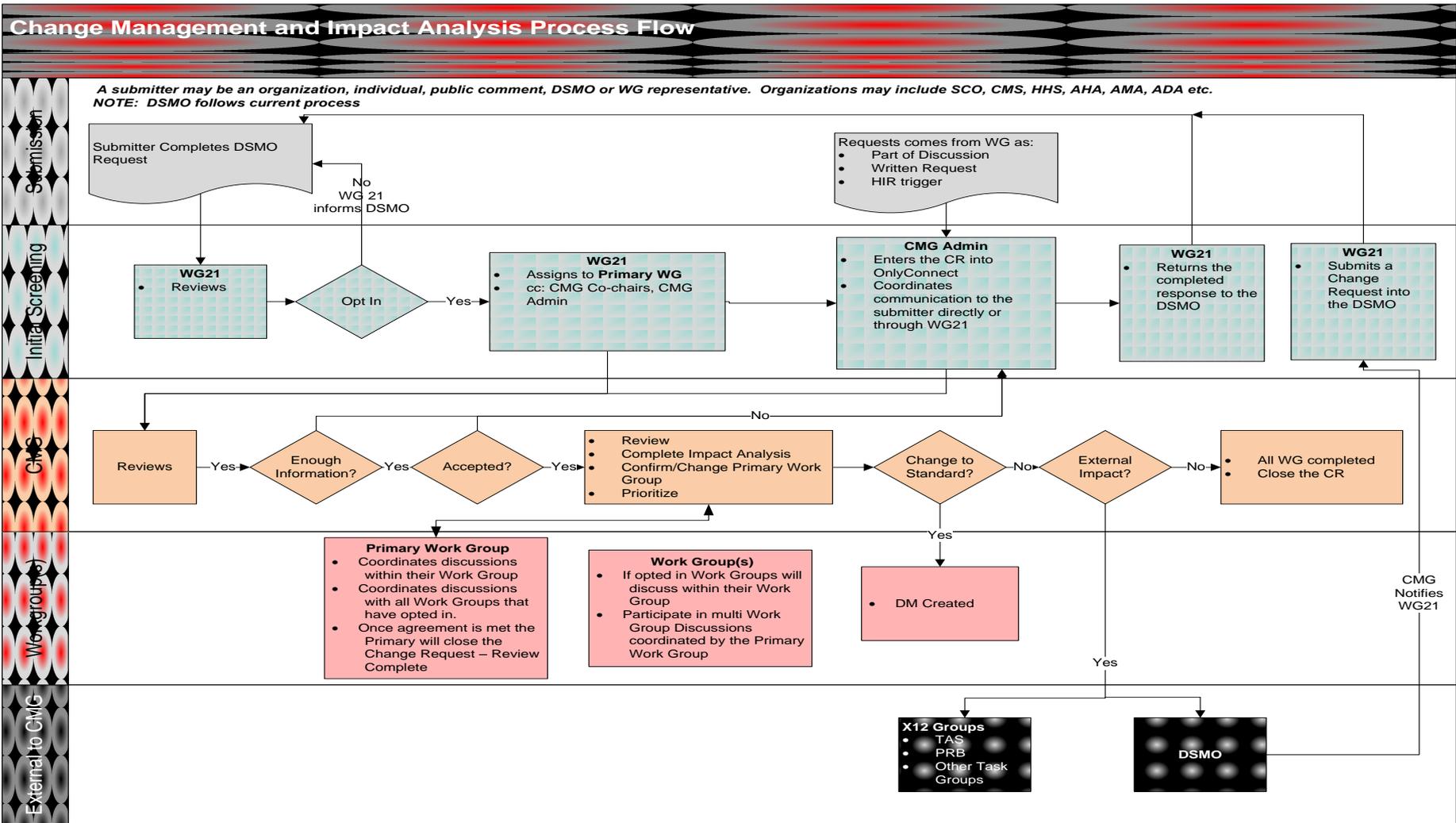
DSMO Request



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