

September 23, 2014

The Honorable Sylvia M. Burwell
Secretary, Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: ASC X12 XML Schemas

Dear Madam Secretary,

The National Committee received a letter on April 30th, 2014 from the Accredited Standards Committee (ASC) X12 standards development organization explaining the need for having national standardized World Wide Web Consortium (W3C) Extensible Markup Language (XML) Schema Definition (XSD) compliant XML schemas that accurately represent and comply with the ASC X12 administrative transaction electronic data interchange (EDI) standards adopted under HIPAA.

XSD is used to express a set of rules that an XML instance document must conform to in order to be considered valid. In the case of ASC X12 XML Schemas, those rules are the same as the rules for ASC X12 EDI formatted content. Consequently, an XML document that is valid according to an ASC X12 XML Schema is also valid from an EDI content perspective because there is a one to one correlation between the EDI and the XML representation.

To reduce the variability when independent organizations create their own schemas, ASC X12 XML Schemas can be used by the industry for two primary purposes:

1. To translate and convert ASC X12 HIPAA EDI transaction standards into XML instance documents that are used in subsequent processes by the receiver.
2. To validate an XML instance document prior to transmitting directly to trading partners enabling near-real-time business transactions. For example, a provider can transmit an XML formatted eligibility request and while still connected to a payer system receive an XML formatted response. That XML formatted response can be transformed into a web page by all web browsers for example.

In order to facilitate standardized industry use of XML instance documents and a wider provider adoption of HIPAA administrative transactions, ASC X12 has developed and published a standard set of schema templates that can be used by vendors and end users to implement XML-based HIPAA transaction products and applications that are compliant with the mandated standards. There are several use cases where standardized XML instance document may be used by the industry and the potential of real-time transactions is one of the more compelling. ASC X12 had approached NCVHS and OESS in past years to raise this issue.

In the ASC X12 April 2014 letter and at the June 2014 NCVHS meeting, representatives from ASC X12 explained that in the last few years, organizations have created their own XSD based on their interpretation of the adopted ASC X12 HIPAA standards. ASC X12 believes that this XSD was not always compliant with the HIPAA standards. In addition, they indicated that there have been inquiries from entities attempting to implement an XML solution, looking for a standardized XSD to assist in implementing the ASC X12 HIPAA standards.

Recognizing the need, value and benefits of standardized XSD across the industry that are compliant with HIPAA transaction standards, and after discussing with CMS/OESS on possible approaches to address this issue, NCVHS makes the following recommendations:

- Recommendation 1: CMS/OESS should post guidance in the form of a Frequently Asked Question (FAQ) providing overall, general parameters and characteristics of a HIPAA-standard-compliant XML Schema.
- Recommendation 2: CMS/OESS should recognize via an FAQ that, an XML instance document that is valid according to an ASC X12 XML Schema meets the general parameters and characteristics from a content perspective of a transmission that is compliant with the HIPAA transaction standards.
- Recommendation 3: ASC X12 should make available their XML Schema to the public through its online store alongside the ASC X12 HIPAA transaction standards.

NCVHS believes that the recommendations will mitigate the concerns raised by ASC X12 until a new standard version is adopted in the future. NCVHS does not expect the recommendations will affect existing operating rules.

Please let us know if we can be of further assistance.

Sincerely,

/s/

Larry A. Green, M.D. Chairperson,
National Committee on Vital and Health Statistics

Cc: HHS Data Council Co-Chairs
ASX X12 Chair
ASC X12N Chair