

February 16, 2016

**NATIONAL COMMITTEE ON VITAL AND HEALTH STATISTICS**

**Subcommittee on Standards  
Review Committee**

CLAIMS ATTACHMENTS

**Comments from  
Department of Veterans Affairs  
as Health Care Provider**

As the largest integrated healthcare system in the US, VA sent and received over 65 million healthcare transactions in 2014. VA's experience with electronic transactions under HIPAA shows VA is typically ahead of the curve in developing internal software solutions to meet electronic standards and early specification is critical for the Agency.

In reviewing the June 2013 NCVHS recommendation letter to the Secretary of HHS, VA, as a health care provider, has concerns and disagreements. Most notable, Recommendation 2, *"Take an incremental, flexible approach to the adoption of attachment standards, implementation specifications and operating rules, and transition period for industry adoption within the roadmap noted above."*

VA's opinion is that it is critical that the following is taken into consideration when making the final recommendation on Claims Attachments:

1. The recommendation should be sizable for any type of organization or provider and needs to be seamless. Large integrated organizations and small single practice providers will both need to be able to comply. Consideration must be given to one solution that allows connectivity between provider and payer using the standard and NOT using web portals, secure emails or other methods for transferring this data. If payers are able to pick and choose how they want to handle Claims Attachments, the entire administrative simplification process becomes far less simple and more onerous for providers who must meet the varied needs of many payers. This would significantly affect VA which currently connects to over 700 payers in any given month from over 120 VAMCs.

2. The recommendation should ensure privacy and security regulations are met. As a federal entity, protecting the personal health information of Veterans is a priority. VA needs to ensure these standards are met and the use of web portals and secure emails do not always protect this key information for Veterans so VA would not be able to comply with any standard or type of attachment that would not assure privacy and security compliance.

VA has presented on different panels in the past encouraging the efficiency of specificity, and Claims Attachments is no different. While the original recommendation was a worthwhile one, too much flexibility allows for too many varied methods for Claims Attachments, creating a much greater level of effort and costs to provide information requested as Claims Attachments to payers, with too much room for interpretation and discretion leading to time-consuming manual discussions with other stakeholders about differences in interpretation which defeats the stated purpose of administrative simplification. VA's position is the more specific, the better.

I hope these remarks have been helpful, and I thank you for the opportunity to submit these comments.

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