

**National Committee on Vital and Health Statistics  
(NCVHS)**

**Subcommittee on Standards**

**Industry Preparations for the updated HIPAA  
Standards and Code Sets**

**Panel 5: Testing**

**Thursday, December 10, 2009**

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Chief Technology Officer,  
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# Presenters

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## Jerry C. Connors

- President, Data Interchange Standards Association (DISA)
- DISA is official secretariat for Accredited Standards Committee (ASC) X12, authors of the 5010 standard transactions

## Edward A. Hafner

- Chief Technology Officer, Foresight Corporation
- Workgroup for Electronic Data Interchange (WEDI):
  - Member, Board of Directors
  - SNIP Transaction co-chair, including Acknowledgement and 5010 Sub-workgroups
  - Former co-chair of Testing Sub-workgroup



# Objective

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- Provide an Industry/Private Partnership perspective:
  - Apply experience from the industry at large
  
- Focus on these questions:
  - What are key issues that will impact testing between trading partners?
  - How should testing be scheduled?
  - Should there be collaboration between entities –i.e. a large group of providers?
  - If so, what kinds of entities should collaborate, and how?
  - What are the challenges for testing collaboration?

# Background

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- Lessons learned from 4010A1 migration experience:
  - Identify authoritative interpretation of the changes
  - Highlight specific conditional changes in the standard
  - Consider common-use case scenarios
  - Address business-specific tests
  
- Compliance dates are fast approaching:
  - Level I Compliance: January 1, 2011
  - Level II Compliance: January 1, 2012



# What issues will impact testing between partners?

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- Achieving Level I Compliance:
  - Some waiting for clearinghouses & vendors
  - Others are not as far along as they should be
  - WEDI has learned some clearinghouses & vendors are targeting 5010-readiness on December 31, 2010
  
- Inconsistent Level I testing will introduce problems during Level II
  
- Many are not considering partner migration project planning
  
- Challenges in tracking partner Level I compliance
  
- **Recommendation:**
  - Set earlier date for clearinghouses & vendors to be 5010-ready
  - Recommend certification solutions to automate consistent testing



# How should testing be scheduled?

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- **Take Level II planning seriously**, especially for multiple partners
- Schedule early: Mid-2010
- Develop pilot partner migrations
  - Apply lessons learned for full migration
- Aggressively schedule Level II migration
  - Load heavily in first half of 2011
- Monitor partner progress to Level I Compliance
  - Proactively adjust schedule, as necessary
- Exchange testing criteria early
  - Partners anticipate Level II testing during Level I compliance phase
- **Recommendation:**
  - Heavily stress: An organization is not Level II compliant until *all* its partners are migrated by the end of 2011



# Should there be collaboration between entities?

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- Yes.
  - Collaboration by provider organizations will raise awareness.
- Payer organizations (e.g. AHIP, BCBSA)
  - Stress importance of 5010/ICD-10 time tables
- Traditional collaboration examples:
  - Some regional communities
  - Hub (payer) & Spoke (provider) model
- **Recommendation:**
  - Enlist aid of provider organizations (e.g. AMA, MGMA) and payer organizations (e.g. BCBSA, AHIP)
  - Consider collaboration through certification organizations and payer/provider organizations (e.g. WEDI)



# What kind of entities should collaborate, and how?

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- Vendors & Clearinghouses
  - Collaborate with their customers to enable compliance
  
- Regional Trading Partners
  - Critical for payers to take the lead with trading partner communities
  
- Provider Organizations / National Organizations
  - Critical to be a key vehicle to aid organizations (i.e., WEDI) achieve 5010 mandates
  
- **Recommendation:**
  - Inspire leadership by payers
  - Engage associations help to raise awareness and help their membership succeed



# What are the challenges for testing collaboration?

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- Regional differences
  - Inconsistent levels of applied validation edits
  - Vendor / Clearinghouse readiness
  - Companion guide edits
    - Will we have them?
    - When will they be ready?
  
- Lack of progress towards Level I compliance
  - Places short time-frame pressures on many healthcare organizations



# Window to Achieve Compliance Is Closing

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- Considering:
  - Current industry slow progress towards Level I
  - Inconsistent testing across industry
  
- Recommendation:
  - Aid industry with consistent, automated certification approach, backed by industry experts
    - Places higher probability to achieve Level I on time
    - Achieves more consistent 5010 implementation



# DISAcert 5010 Certification Service

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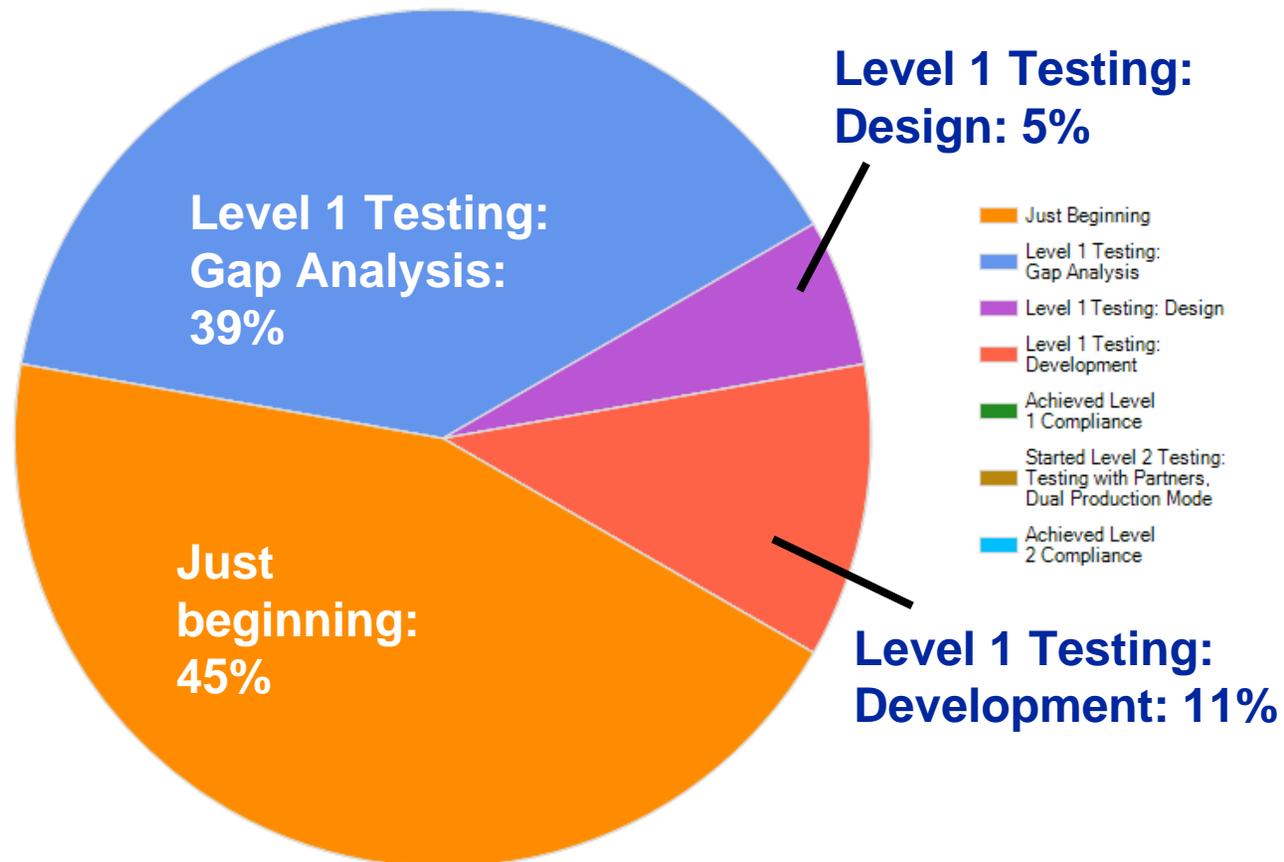
- Partnership Evolution
  - DISA
  - Foresight Corporation
  - e-Emergence
  
- DISAcert represents
  - Established foundation for migrating the industry
  - Scenario-based testing
  - KnowledgeBase of shared questions / answers



# DISA Membership Survey Results

## ■ Where are you in the migration process?

What stage are you in for your 5010 migration process? (Please mark all that you have completed.)

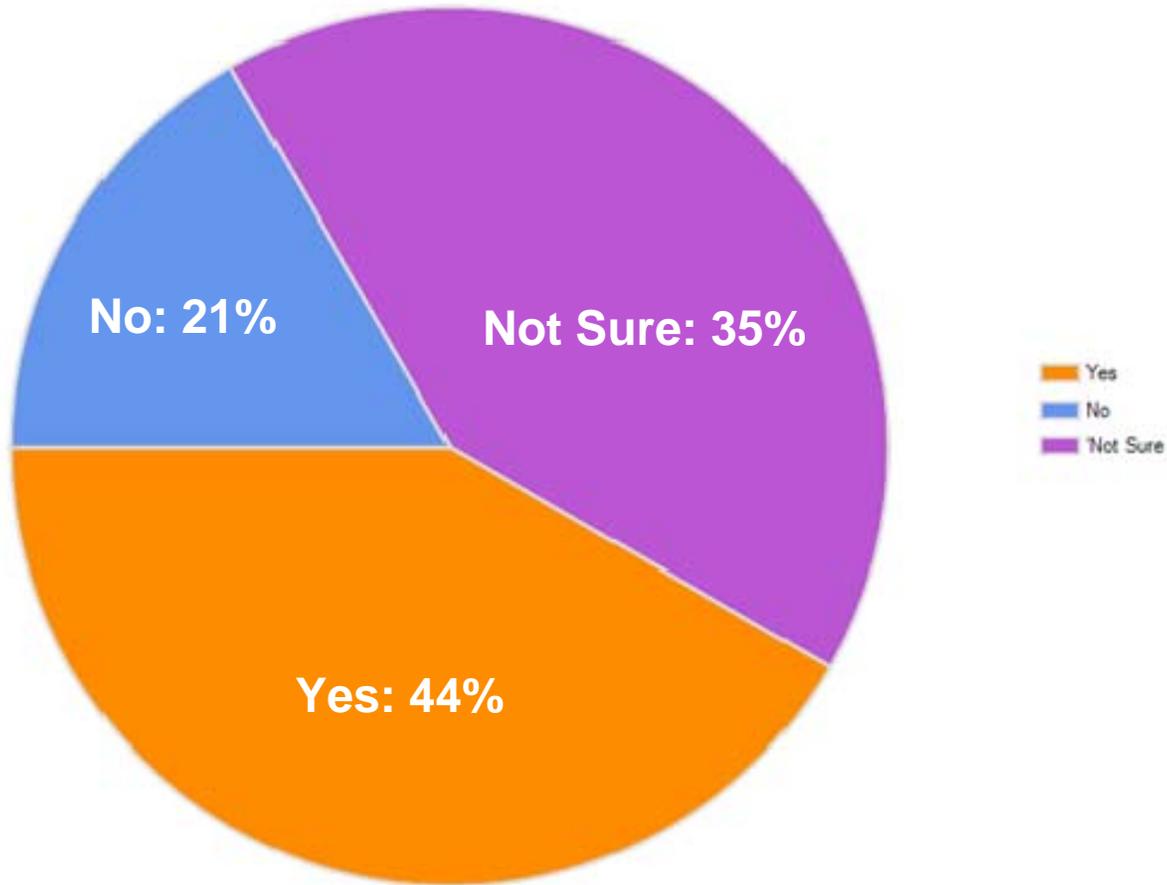


SOURCE: DISA Survey, October 2009

# DISA Membership Survey Results

- Do you plan to use a certification service?

Do you plan to use a 5010 certification service?

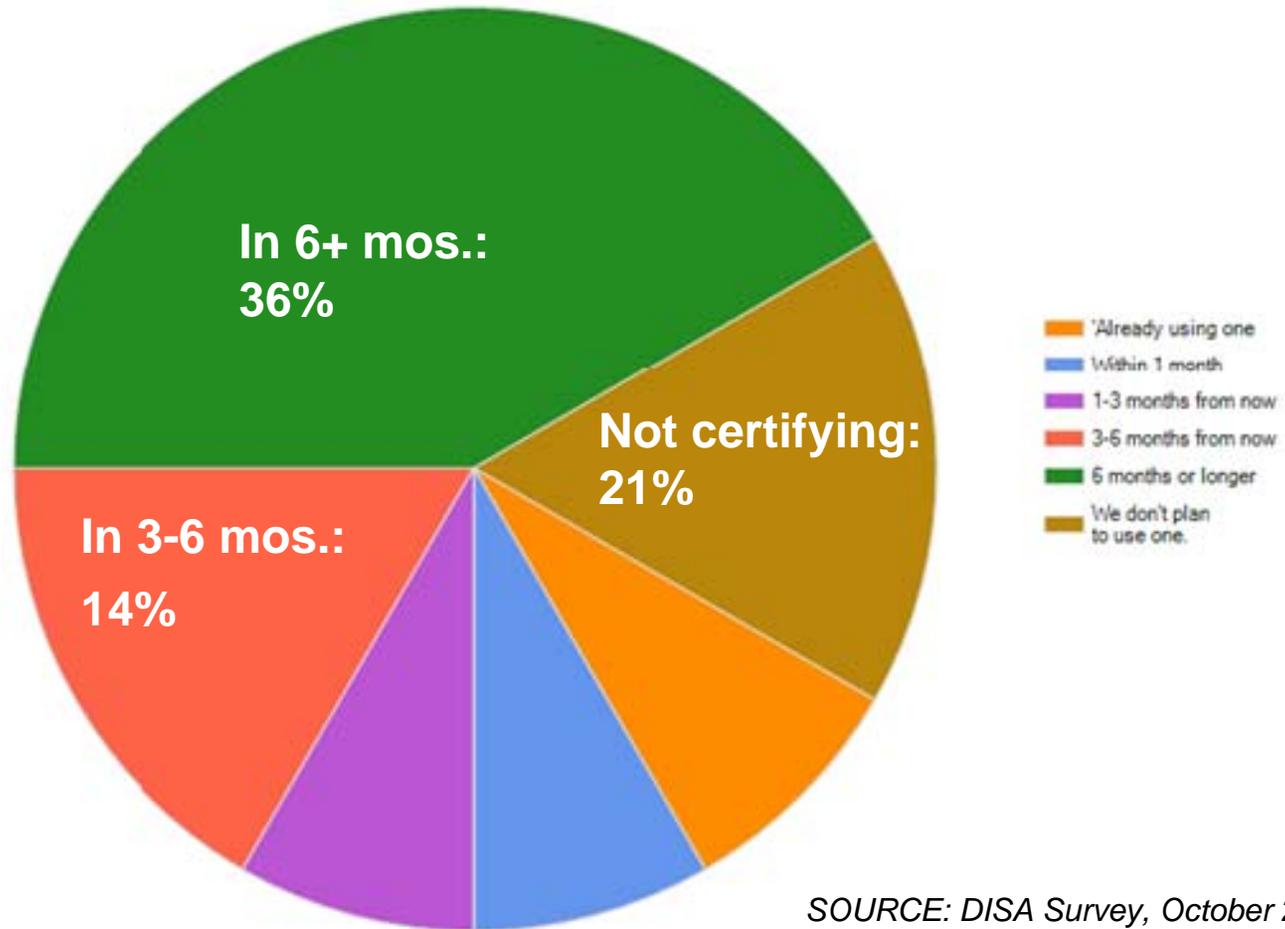


SOURCE: DISA Survey, October 2009

# DISA Membership Survey Results

## ■ When will you start your certification?

If yes, when do you plan to begin your 5010 certification process?



SOURCE: DISA Survey, October 2009



# Summary: Recommendations

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- Set earlier 5010 compliance date for clearinghouses & vendors
- Support consistent, automated certification, backed by industry experts
- Recommend solutions to automate consistent testing
- Emphasize:  
An organization is not Level II compliant until *all* its partners are migrated by January 1, 2012
- Enlist aid of provider organizations (e.g. AMA, MGMA) & payer organizations (e.g. BCBSA, AHIP)
- Consider collaboration through certification organizations and payer/provider organizations (e.g. WEDI)
- Inspire leadership by payers
- Engage associations help to raise awareness and help their membership succeed



**Thank You**



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