



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

**Hearing on HIPAA and ACA  
Administrative Simplification  
Operating Rules**

**Thursday, February 26, 2015**

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Emdeon

*Leading Provider of Revenue and Payment Cycle Management and Clinical Information Exchange*

- 30 Years of Experience
- Processing more than 7.4 billion transactions each year
- Connected to
  - 700,000 physicians
  - 105,000 dentists
  - 60,000 pharmacies
  - 5,000 hospitals
  - 600 vendors
  - 450 labs
  - 1,200 government and commercial payers.



# 1. Should the RC evaluation criteria be used to evaluate new/proposed standards and operating rules? Please explain.

- Change Log
- Business Reason for Change
- Return on Investment
- Interoperability
- Complexity of Implementation
- Other regulatory demands on the industry
- Policy changes that could impact implementation
- Interdependencies of the Transactions
- Impact on operating rules (new and existing)
- State of the vendors



## **2. Should the RC evaluation criteria be used to evaluate new/proposed standards and operating rules? Please explain.**

Yes, once criteria is established it should be used to evaluate any proposed standards or operating rules regardless of whether they are new or revised.

## **3. Do you have evaluation criteria that can be used to evaluate standards and operating rules?**

- Use our extensive data to analyze the changes
- Perform extensive mapping to and from the new version to ensure compatibility
- Run volume tests to identify issues and challenges
- Meet with our trading partners to discuss the impacts, identify recommended solutions, and seek their input.

#### 4. What evaluation criteria have you seen that are effective? Please explain?

- Testing with vendors prior to implementation
- Payer testing with clearinghouses
- Sharing outcomes

#### 5. What process(s) should be used to evaluate standards and operating rules?

- Pilot Testing prior to adoption of new/revised standards
- A pilot program needs to include
  - Analysis of the changes
  - Inoperability to facilitate the transition
  - Impact assessment
  - Reporting mechanism for the committee to use in making their decision.



Thank You

