



**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. Business needs of the health care industry the operating rules intend to address.

- Provides consistency in response time.
- Provides consistency in Companion Guides.

2. Efficiency improvement opportunities for administrative and/or clinical processes in health care, and strategies to measure impact.

- Do not see efficiency improvements.
- Support the decision to not address data content.



3. Potential impact of the operating rules to various health care entities (providers, payers, etc.) on the daily workflow/transaction process; administrative costs, required capabilities and agility to implement the operating rules.

We do not see any changes in the daily workflow of transaction processing. There is however, additional costs associated with the implementation of an infrastructure that has not been fully utilized to date.

4. Potential emerging or evolving clinical, technical and/or business advances the operating rules intend to address or facilitate.

Changes to require x.509 Certificates will add costs to the process as the Certificates are not free and can cost up to \$475 per server.

5. Potential impact and/or improvement to health care related data and/or data infrastructure?

Based on our review of the Operating Rules for Phase IV, there are no content requirements, therefore there is no impact at this time. Emdeon is supportive of the decision not to address content.

6. If applicable, do they incorporate privacy, security and confidentiality?

- Although the Safe Harbor Rule addresses the security it is not consistent with previous Phases.
- Phase IV Rules do not address privacy and security.

Thank You

