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Dear Chair Suarez,

ASC X12, chartered by the American National Standards Institute (ANSI) for more than 30 years, develops and maintains EDI standards and XML schemas which drive business processes globally. The diverse membership of ASC X12 includes technologists and business process experts, encompassing health care, insurance, transportation, finance, government, supply chain and other industries.

Although ASC X12 was not asked to sit on the panel for the Claims-based Databases, we would like to provide the following input on PART 3: STANDARDS – EMERGING ISSUES AND CHALLENGES:

Review current formats in use and future opportunities to standardize reporting formats across states (X12, NCPDP, others).

In 2012, ASC X12 published the Post Adjudicated Claims Data Reporting (PACDR) guides for professional, institutional and dental transactions.

- In the development process, outreach was done to both ASC X12 members and non-members to engage all stakeholders of the industry.
 - Consensus was reached on:

- A set of core data elements including data definitions and format for each data element.
 - The usage of data elements as required vs. situational
- Active participation included the states of Vermont, New Hampshire, New York, Utah, Maine, Massachusetts, Oregon, and Minnesota as well Kaiser Permanente, Independent Health, the All Payers Claim Database Council (APCD), AETNA, Anthem and others.
- ASC X12 is aware of entities who have implemented using the ASC X12 developed transactions.
 - Known Receivers – New York State Department of Health who has over 23 New York State Qualified Health Plans and 53 New York Medicaid Managed Care Plans sending 837 PACDR with 3.6 million encounters per week.
 - Known Senders – Independent Health (to New York State Department of Health), Anthem (send 837 PACDR to 3 trading partners and all others use proprietary formats.
 - A total of 109 PACDR guides have been purchased from the ASC X12 Store, and the implementation base has the potential of being greater than ASC X12 is aware.

ASC X12 is currently in the process of developing a Member Reporting Guide with the purpose of reporting plan members and member related information, which may or may not be available on a claim transaction, to All Payers Claims Databases for the purpose of enhancing health data reporting.

- Outreach to ASC X12 members and non-members was conducted for the development.
- Active participants include AETNA, Independent Health, State of New York, UHIN, CDC, New Hampshire Insurance Department, Humana, Kaiser Permanente, and Anthem.

Identify benefits, efficiencies and barriers, to the adoption of a common Claims-based Databases/APCD reporting standard.

- The ASC X12 PACDR guides are standards which are based upon the HIPAA transactions that providers send to payers. This will allow plans to forward information received from the providers to the claims-based database for reporting. This reduces the burden on payers who are using similar formats allowing for greater adoption, (which proprietary formats do not).
- It allows for consistent code sets, data elements and terminology usage.
- Validation and translation software utilizing the 837 PACDR guides have already been developed by some translator vendors

- ASC X12 has an established change request process in which updates can be made to the standards based on business need.
- ASC X12 has established standard acknowledgments that can be used with 837 PACDR guides

Identify emerging reporting needs to support healthcare transformation and payment reform (e.g., capturing non-claims transactions, data linkage, etc.).

- The PACDR guides allow the submitted & adjudication information to be reported in one transaction and also includes any previous payer processed information.
- The Member Reporting Guide will allow the ability for plan to report information on the member/subscriber not available in the claim.

Outline a roadmap for achieving standardization and how NCVHS may engage in a supportive role.

- We recommend using the Designated Standards Maintenance Organization (DSMO) process to recommend adoption of standard transactions developed by the SDOs, specifically ASC X12 and NCPDP.

Please contact me at chair@ascx12.org if you need further information or have any questions.

Sincerely,

A black rectangular redaction box covering the signature of Gary A. Beatty.

Gary A. Beatty
ASC X12 Chair

cc: Rebecca Hines, MHS, Executive Secretary, E-mail: vgh4@cdc.gov