

From: [Huang, Hong](#)
To: [NCVHS Mail \(CDC\)](#)
Subject: Predictability Roadmap
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I have a comment on the following bullet point (as seen on page 11 of the “Recommendations for Predictability Roadmap NCVHS Oct2018”):

11. HHS should publish rulemaking to enable the adoption of a floor (baseline) of standards and operating rules. This rulemaking should also consider other opportunities that advance predictability and support innovation.

Assuming a payer only adopted the baseline standard of a certain transaction. When a provider wants to send that payer the same transaction but coded in a higher standard, wouldn't the payer be forced into upgrading its systems to deal with the higher standard? In the end, the trading partner who adopts the highest level of standard will end up dictating the level for every party involved.

Best regards,

*Hong Huang
Architect, HIS EDI Enrollment
hong.huang@cambiahealth.com
503.450.1708*

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