



National Committee on Vital and Health Statistics
Advising the HHS Secretary on National Health Information Policy

Subcommittee on Standards Update

June 18, 2020

Topics



1. Follow-up on March 2020 recommendations for adoption of updated NCPDP HIPAA standards
2. Update on HITAC Task Force on Intersection of Clinical and Administrative Data (ICAD)
3. Plans for August 25-26 hearing on CAQH CORE Operating Rules proposed for federal adoption

Overview: Recommendations to HHS on NCPDP F6 Standards



1. Received request from DSMO in January 2020 to recommend adoption of an updated NCPDP standard as a HIPAA-mandated national standard.
2. As part of the March 24 NCVHS meeting, heard from industry, deliberated the NCPDP F6 standard and voted to make two recommendations to the Secretary: adoption of F6 and a timeline for its adoption.
3. Subsequent to NCVHS meeting, drafted the letter to HHS adding a third recommendation clarifying status of the NCVHS recommendations on Batch Version 10 and Medicaid Subrogation that had been associated with our May 2018 recommendation to adopt F2. Recommendation letter reviewed and approved by Subcommittee on Standards and by the Executive Subcommittee.
4. Submitted letter to HHS on April 22, 2020
5. Received June 9, 2020 response from HHS acknowledging recommendations.

ONC Health Information Technology
Advisory Committee's (HITAC)
Intersection of Clinical and Administrative
Data (ICAD) Task Force

Update on ONC's HITAC ICAD Task Force



Vision:

Support the convergence of clinical and administrative data to improve data interoperability to support clinical care, reduce burden and improve efficiency—furthering implementation of “record once and reuse.”

Overarching Charge:

Produce information and considerations related to the merging of clinical and administrative data, its transport structures, rules and protections, for electronic prior authorizations to support work underway, or yet to be initiated, to achieve the vision.

Update on ICAD Task Force, cont.



NCVHS participants on ICAD:

- Standards Subcommittee
 - Alix Goss (ICAD co-chair)
 - Rich Landen
 - Deb Strickland
- Subcommittee on Privacy, Confidentiality and Security
 - Jacki Monson

Update on ICAD Task Force, cont.



Target: Produce report for HITAC review and acceptance (Fall 2020)

Approach:

1. Weekly Task Force meetings
2. Small group efforts between meetings
3. Industry engagement via presentations
4. Compendium of resources

Update on ICAD Task Force, cont.



Month/Date	Deliverables/Action Items
June	<p>Presentations from Industry Stakeholders</p> <p>Wrap Up:</p> <ul style="list-style-type: none">- Prior Authorization Ideal State and Guiding Principles- Data Classes and Process Mapping- Prior Authorization Recommendations- Report Outline
July	<p>Commence Deep Dive Into Convergence of Clinical and Administrative Data</p> <p>Start Writing Report</p>
August 2020	<p>Solidify Convergence Recommendations</p> <p>Advance Report Narrative</p>
September 9, 2020	<p>Present Draft Recommendations to HITAC for feedback</p>
October 21, 2020	<p>Finalize Recommendations and Report</p>

NCVHS 2020 Convergence Project



- Develop recommendations to support convergence of clinical and administrative data with initial focus on the prior authorization transactions and workflow
- In collaboration with ONC, the Committee aims to:
 - identify and recommend a path toward convergence of administrative and clinical data standards.
 - propose to use the prior authorization processes of industry as an exemplar, and to better understand and guide convergence paths for health care policy and standards.

Convergence Project Next Steps

- **Phase I**

Discovery: Over the next few months, NCVHS will compile existing information while the HITAC Task Force on Intersection of Clinical and Administrative (ICAD) meets, to avoid duplication of effort.

- **Phase II**

Analysis: After the ICAD TF has completed its work and developed recommendations, policy papers or white papers, NCVHS will review the artifacts, and determine appropriate actions.

NCVHS Subcommittee on Standards CAQH CORE Operating Rules Hearing

Hearing on Proposed Operating Rules



- Virtual hearing August 25 & 26
- Federal Register Notice of hearing and instructions for submitting written comments
- Invitations to ~20 organizations to testify
- Letters to an additional ~10 organizations encouraging them to submit written comments

Hearing on Proposed Operating Rules, cont.



- All presenters asked to submit written comments in advance of the hearing using Standards Subcommittee question set
- Presenters asked to use template to highlight themes:
 - Anticipated value of the proposed rules
 - Anticipated concerns about the proposed operating rules
 - Top 3-5 points for NCVHS to consider in its recommendations to HHS regarding potential adoption of the proposed operating rules

Operating Rules Hearing Scope: 3 Rules



1. **CAQH CORE Prior Authorization (278) Data Content Rule v5.0.0** - This operating rule specifies data content requirements for patient identification, error/action codes, communicating with providers regarding needed information and clinical documentation, status/next steps, and decision reasons to streamline the review and adjudication of prior authorization requests and facilitate faster response times.
2. **CAQH CORE Prior Authorization (278) Infrastructure Rule v4.1.0** - This operating rule specifies prior authorization requirements for response times, system availability, acknowledgements, and companion guides. Specifically, this rule sets response time limits for health plans to request supporting information from providers and make final determinations on prior authorization requests.
3. **CAQH CORE Connectivity Rule v4.0.0** - This operating rule establishes consistent connectivity requirements for data exchange across the HIPAA Administrative Simplification transactions. Specifically, this rule improves security through stronger authentication requirements and reduces complexity by requiring a single envelope standard. CAQH CORE is proposing that this rule replace the existing CAQH CORE Connectivity Rules v1.1.0 and v2.2.0 and apply across the HIPAA Administrative Simplification transactions including eligibility, claim status, electronic remittance advice (ERA), and prior authorization and referrals.

Operating Rules Hearing: Web Resources



NCVHS Resources: <https://ncvhs.hhs.gov/meetings/standards-subcommittee-meeting-2/>

- Letter Requesting Consideration of Operating Rules for Adoption
- Questions set for ALL commenters
- More to come: agenda, written submissions, etc.

CAQH CORE Resources:

- General Information: <https://www.caqh.org/core/operating-rules>
- Prior Authorization: <https://www.caqh.org/core/prior-authorization-referrals-operating-rules>
- Connectivity: <https://www.caqh.org/sites/default/files/core/phase-iv/470-connectivity-rule.pdf>

Operating Rules: Next Steps



June/July:

- Preparation activities by Standards Subcommittee and industry
- Receive, analyze and consolidate input from stakeholders

August:

- Conduct hearing including opportunities for public comment

Fall:

- Subcommittee deliberation and drafting of recommendations
- Present subcommittee recommendation to full Committee
- Draft and send letter to HHS Secretary conveying full Committee decision



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Questions & Discussion