NCVHS Subcommittee on Standards Hearing on Proposed CAQH CORE Connectivity Operating Rule vC3.1.0

AUGUST 25-26, 2020
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MONTEFIORE HEALTH SYSTEM

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Montefiore Health System is one of New York's premier academic health systems and is a recognized leader in providing exceptional quality and personalized, accountable care to approximately three million people in communities across the Bronx, Westchester, and the Hudson Valley. It is comprised of 10 hospitals, including the Children's Hospital at Montefiore, Burke Rehabilitation Hospital, and close to 200 outpatient care sites. The advanced clinical and translational research at its medical school, Albert Einstein College of Medicine, directly informs patient care and improves outcomes. From the Montefiore-Einstein Centers of Excellence in cancer, cardiology and vascular care, pediatrics, and transplantation, to its preeminent school-based health program, Montefiore is a fully integrated healthcare delivery system providing coordinated, comprehensive care to patients and their families.

- Montefiore Health System has engaged with CAQH CORE since inception and has benefited significantly from operating rules.

- Examples of how Montefiore has benefited from federally mandated operating rules for eligibility, claim status, and payment and remittance transactions include:
  - Decreased claim denials and accounts receivable
  - Time saved in registration and billing
  - Increase in patient collections at the time of service
  - Reduced transaction fees and connectivity costs
  - Increase in auto-adjudication of payment and remittances

- Montefiore's proprietary systems are CORE-certified for Eligibility & Benefits and Claim Status.

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Anticipated Value of the Proposed Connectivity Operating Rule

- **Improved Security and Reduced Vulnerabilities:**
  - CAQH CORE Connectivity Rule vC1.1.0 is federally mandated for the eligibility transaction and the CAQH CORE Connectivity Rule vC2.2.0, which builds on vC1.1.0, is mandated for eligibility, claim status, and electronic remittance advice (ERA) transactions. When initially developed more than 10 years ago, these connectivity rules represented cutting-edge security and connectivity protocols. However, the industry has advanced since this time.
  - Compared to the current state (vC2.2.0), the CAQH CORE Connectivity Rule vC3.1.0 will reduce complexity by moving to a single SOAP standard, enhance security using certificate-based authentication instead of username and password, and improve the communication of errors.

- **Consistent Connectivity Safe Harbor Across Transactions:**
  - Updating the connectivity requirements for eligibility, claim status, and ERA transactions, in addition to mandating support for the prior authorization transaction, will ensure consistent, best practice security and connectivity methods across administrative transactions that can be updated over time.
  - The CAQH CORE Connectivity Rule vC3.1.0 will enable Montefiore to use a common connectivity method across EDI transactions and trading partners which will reduce onboarding costs.

- **Lower Ongoing Costs:**
  - Less administrative support for multiple connectivity rules and improved security and network authentication in the vC3.1.0 requirements will lower ongoing costs.

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Anticipated Concerns About the Proposed Connectivity Operating Rule

- **Limited Adoption without a Federal Mandate:** A federal mandate will accelerate industry adoption beyond early implementers by making investment dollars and resources available to ensure compliance. CORE Certification data suggests that federal mandates drive adoption and certification, enabling prioritization and vendor development.

- **Lagging Enforcement:** HHS never adopted a health plan certification program as specified in the Affordable Care Act; therefore enforcement of federally mandated operating rules relies on the compliant-driven process used by CMS. Montefiore is concerned that even if this rule is federally mandated, limited enforcement may reduce adoption.

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Key Considerations for NCVHS Related to the Proposed Connectivity Operating Rule

- A single connectivity rule across all transactions is easier to update, reduces confusion, and promotes industry alignment on best practices.
  - Eliminates wasted industry resources supporting multiple connectivity models across trading partners.

- The connectivity safe harbor assures providers of a common method to connect across administrative transactions that is innovative and secure.
  - Reduces onboarding of new trading partners from weeks to just days as the specifications are normative and use the latest authentication standards.

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