

NCVHS Subcommittee on Standards Hearing on Proposed CAQH CORE Operating Rules

AUGUST 25-26, 2020

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Anticipated Value of Proposed Operating Rule(s)

Overall, we would want to express support for the adoption of the proposed Operating Rules for Prior Authorization Data Content and Infrastructure, as well as the overarching Connectivity Rule (which would apply to all other ORs before).

Anticipated Concerns about Proposed Operating Rule(s)

Prior Auth Data Content Rules Set – operating rules seem to overlap or override the Technical Report 3 implementation guide requirements included in X12 278

Infrastructure Rules Set – we see no issues with the response time limits for all various submission and response requirements, but others might.

Connectivity Rules Set – does a good job at increasing the security of transactions, however, we raise two main concerns...

Top 3-5 points for NCVHS to consider in its recommendations to HHS for adoption of proposed operating rule(s)

We recommend that NCVHS and regulatory bodies consider pursuing increased voluntary adoption of standards, through the use of appropriate program incentives and policy levers.

We are concerned about the degree to which the Operating Rules are able to be implemented in a scenario where HL7 FHIR standards are used

We support for a HIPAA exception to allow end-to-end implementation testing of a FHIR-based transaction model for HIPAA transactions including Prior Authorization and other real time transactions.