



NCVHS Standards Subcommittee  
Hearing:  
CAQH CORE Proposal  
Jan. 19, 2023

Presented by:  
Robert Tennant, VP Federal Affairs

# ABOUT WEDI

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- Formed in 1991 by then-Secretary of the U.S. Department of Health and Human Service (HHS) Dr. Louis Sullivan
- Named in the Health Insurance Portability and Accountability Act of 1996 (HIPAA) legislation as an advisor to the Secretary of HHS
- Multi stakeholder membership: plans, providers, vendors, SDOs, state/federal govt
- We have productive working relationships with the Centers for Medicare & Medicaid Services (CMS) and Office of the National Coordinator for Health Information Technology (ONC)
- 18 workgroups/taskgroups-including Claims and Remittance Advice/Payment
- Our roles: convene, collaborate, educate, influence

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Advisor

A blue rounded rectangle containing the text "Secretary of HHS" in white.

Secretary of  
HHS

# WEDI Member Position Advisory Process

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- Member Position Advisory (MPA) process designed to solicit WEDI member input on topical issues, public and private sector proposals, or government regulations
- MPA process designed to advise the WEDI Board of Directors as it develops the official WEDI response
- In response to the NCVHS RFC, WEDI collected member perspectives through workgroup discussions, surveys, and virtual events

# MPA Data Collection Process



WG Discussions: RFC Discussion in our Claims and Remittance and Payments SWGs

MPA Event: WEDI hosted a 4-hour virtual event on Nov. 9, 2022. 75 participants shared their perspectives on the RFC questions and how best to implement new standards and operating rules. WEDI conducted polls during the event to capture additional viewpoints.

Survey: Another component of our MPA process was the collection of industry perspectives on the CAQH CORE proposals through a survey conducted September 28 through October 27, 2022. We received 58 responses to CAQH CORE proposals.

## CAQH CORE Survey Participants

Answer Choices	Responses (%)	Responses (Number)
Provider	15.5%	9
Payer	43.1%	25
Clearinghouse	19.0%	11
Vendor	22.4%	13
Total		58

# Survey Respondents



WEDI asked respondents “Identify your level of familiarity with the CAQH CORE initiative to create updated and new operating rules in support of electronic transactions.”

Answer Choices	Responses (%)	Responses (Number)
We are CAQH CORE members and participated in the development of the updated and new operating rules.	39.2%	39
We are CAQH CORE members but did not participate in the development of these operating rules.	5.6%	3
We have reviewed these operating Rule proposals.	22.2%	12
We are aware that CAQH CORE have developed updated and new operating rules but do not know the details.	29.6%	16
We have no familiarity with these proposals.	7.4%	4
TOTAL		54

# CAQH CORE Connectivity Rule vC4.0

WEDI survey question: “Please rate your level of agreement or disagreement with the following statements regarding the impact the updated CAQH CORE Connectivity Rule vC4.0.0 will have on your organization and/or the industry.”

## Response Highlights:

- **35%** responded “Agree/Strongly Agree” that **“These operating rules will reduce cost, enhance utility, and improve quality of care delivered”** 22% stated “Unsure at this Time” and 38% “Neither Disagree nor Agree.”
- **46%** responded “Agree/Strongly Agree” that **“These operating rules take an important step to standardize operational challenges within VBP Models,”** 15% stated “Unsure at this Time,” and 23% “Neither Disagree nor Agree.”
- **53%** responded “Agree/Strongly Agree” that **“These operating rules lay the foundation for creating common expectations to enhance the exchange of attachments to drive electronic adoption,”** 18% stated “Unsure at this Time,” and 20% “Neither Disagree nor Agree.”



# CAQH CORE Connectivity Rule vC4.0

## Response Highlights:

- **58%** responded “Agree/Strongly Agree” that **“This update to existing federally mandated rules will respond to immediate industry need to align requirements with current and emerging business, operational, security, and connectivity best practices, while promoting technological advances within the industry,”** 15% stated “Unsure at this Time,” and 18% “Neither Disagree nor Agree.”
- **58%** responded “Agree/Strongly Agree” that **“These operating rules lay the foundation for creating common expectations to enhance the exchange of attachments to drive electronic adoption,”** 15% stated “Unsure at this Time,” and 18% “Neither Disagree nor Agree.”

# CAQH CORE Connectivity Rule vC4.0

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- ❖ Additional MPA Polling. “Rate the level of potential benefits associated with the New Connectivity operating rule.” **62% answered Significantly or Somewhat Improved Benefits**, 15% replied No Change in Benefits, 4% stated Somewhat Decreased Benefits, 4% replied Significant Decrease in Benefits, and 15% stated Don't Know.



# Infrastructure ORs

WEDI survey question: “Please rate your level of agreement or disagreement with the following statements regarding the impact the updated CAQH CORE Infrastructure ORs will have on your organization and/or the industry.”

## Response Highlights:

- **36%** responded “Agree/Strongly Agree” that **“These ORs will reduce cost, enhance utility, and improve quality of care delivered”** 24% stated “Unsure at this Time,” 24% “Neither Disagree nor Agree,” 15% “Disagree/Strongly Disagree.”
- **39%** responded “Agree/Strongly Agree” that **“These ORs take an important step to standardize operational challenges within VBP Models,”** 21% stated “Unsure at this Time,” and 21% “Neither Disagree nor Agree,” 12% “Disagree/Strongly Disagree,” 6% N/A.

# Infrastructure ORs

## Response Highlights:

**56%** responded “Agree/Strongly Agree” that **“These ORs lay the foundation for creating common expectations to enhance the exchange of attachments to drive electronic adoption,”** **16%** stated “Unsure at this Time,” and **16%** “Neither Disagree nor Agree,” **12%** “Disagree/Strongly Disagree.”

- **61%** responded “Agree/Strongly Agree” that **“This update to existing federally mandated rules will respond to immediate industry need to align requirements with current and emerging business, operational, security, and connectivity best practices, while promoting technological advances within the industry,”** **15%** stated “Unsure at this Time,” and **15%** “Neither Disagree nor Agree,” **9%** “Disagree/Strongly Disagree.”

# Infrastructure ORs

- ❖ Additional MPA Polling. “Rate the level of potential benefits associated with the updated Infrastructure ORs.” 65% answered **Significantly/Somewhat Improved Benefits**, 13% indicated No Change in Benefits, 0% Somewhat Decreased Benefits, 0% said Significant Decrease in Benefits, with 22% stating Don’t Know.

WEDI survey question: “Please rate your level of agreement or disagreement with the following statements regarding the impact the updated CAQH CORE Eligibility & Benefits (270/271) Data Content OR vEB.2.0 will have on your organization and/or the industry.”

Response Highlights:

- **39%** responded “Agree/Strongly Agree” that **“This operating rule take an important step to standardize operational challenges within VBP,”** 18% stated “Unsure at this Time,” and 21% “Neither Disagree nor Agree,” 15% “Disagree/Strongly Disagree,” 6% N/A.”
- **39%** responded “Agree/Strongly Agree” that **“This operating rule will reduce cost, enhance utility, and improve quality of care,** 24% stated “Unsure at this Time” and 15% “Neither Disagree nor Agree,” 15% “Disagree/Strongly Disagree.”
- **54%** responded “Agree/Strongly Agree” that **“This update to existing federally mandated rules will respond to immediate industry need to align requirements with current and emerging business, operational, security, and connectivity best practices, while promoting technological advances within the industry,”** 12% stated “Unsure at this Time,” and 21% “Neither Disagree nor Agree,” 12% “Disagree/Strongly Disagree.”
- **54%** responded “Agree/Strongly Agree” that **“These operating rules lay the foundation for creating common expectations to enhance the exchange of attachments to drive electronic adoption,”** 12% stated “Unsure at this Time,” and 21% “Neither Disagree nor Agree, 12% “Disagree/Strongly Disagree.”

- ❖ Additional MPA polling. “Rate the level of potential improvement in efficiency that these Eligibility and Benefits operating rules would contribute to your organization.” 47% answered **Significant Improvement/Improvement in Efficiency**, 30% indicated No Change in Efficiency, 7% replied Decreased Efficiency, 0% replied Significant Decrease in Efficiency, with 17% stating Don't Know.
- ❖ “Rate the level of potential benefits to VBP that would be associated with the new Eligibility and Benefits Data Content operating rules.” **39% answered Significantly/Somewhat Improved Benefits**, 12% indicated No Change in Benefits, 0% replied Somewhat Decreased Benefits, 8% said Significant Decrease in Benefits, with 42% stating No Opinion.



WEDI survey question: “Please rate your level of agreement or disagreement with the following statements regarding the impact the new CAQH CORE Eligibility & Benefits (270/271) Single Patient Attribution Data Content operating rule vEB.1.0 will have on your organization and/or the industry.”

Response Highlights:

- **27%** responded “Agree/Strongly Agree” that **“These operating rules will reduce cost, enhance utility, and improve quality of care delivered,”** 27% stated “Unsure at this Time” and 30% “Neither Disagree nor Agree,” 24% “Disagree/Strongly Disagree.”
- **33%** responded “Agree/Strongly Agree” that **“This update to existing federally mandated rules will respond to immediate industry need to align requirements with current and emerging business, operational, security, and connectivity best practices, while promoting technological advances within the industry,”** 24% stated “Unsure at this Time,” and 30% “Neither Disagree nor Agree,” 12% “Disagree/Strongly Disagree.”
- **33%** responded “Agree/Strongly Agree” that **“These operating rules take an important step to standardize operational challenges within VBP Models,”** 27% stated “Unsure at this Time,” and 27% “Neither Disagree nor Agree,” 9% “Disagree/Strongly Disagree.”
- **36%** responded “Agree/Strongly Agree” that **“These operating rules lay the foundation for creating common expectations to enhance the exchange of attachments to drive electronic adoption,”** 27% stated “Unsure at this Time,” and 21% “Neither Disagree nor Agree,” 15% “Disagree/Strongly Disagree.”

# Patient Attribution: Additional Discussion

- ❖ It appears from our MPA discussion that few stakeholders have completed an analysis to determine the impact and potential value of implementing an operating rule for patient attribution.
- ❖ Some health plans indicated that only a small percentage of their members are currently in VBP, thus limiting the potential impact of a patient attribution operating rule. MPA participants noted that the VBP model is so small at this point that many processes are not yet automated.
- ❖ There was discussion that the patient attribution rule is directionally correct but may be ahead of overall industry adoption of VBP. As more and more value-based contracts are being conducted between health plans and providers, opportunities to improve the data flow and thus improve the process of delivering care should be explored.



# Attachments ORs

WEDI survey question: “Please rate your level of agreement or disagreement with the following statements regarding the impact the new CAQH CORE Attachments operating rules for health care claims will have on your organization and/or the industry.”

## Response Highlights:

- **30%** responded “Agree/Strongly Agree” that **“These operating rules take an important step to standardize operational challenges within VBP Models,”** 21% stated “Unsure at this Time,” and 27% “Neither Disagree nor Agree,” 21% “Disagree/Strongly Disagree.”
- **39%** responded “Agree/Strongly Agree” that **“These ORs will reduce cost, enhance utility, and improve quality of care delivered,”** 24% “Unsure at this Time” and 15% “Neither Disagree nor Agree,” 21% “Disagree/Strongly Disagree.”

# Attachments ORs

## Response Highlights:

- **42%** responded “Agree/Strongly Agree” that **“This update to existing federally mandated rules will respond to immediate industry need to align requirements with current and emerging business, operational, security, and connectivity best practices, while promoting technological advances within the industry,”** 18% stated “Unsure at this Time,” and 24% “Neither Disagree nor Agree,” 15% “Disagree/Strongly Disagree.”
- **45%** responded “Agree/Strongly Agree” that **“These ORs lay the foundation for creating common expectations to enhance the exchange of attachments to drive electronic adoption,”** 15% stated “Unsure at this Time,” and 27% “Neither Disagree nor Agree,” 12% “Disagree/Strongly Disagree.”

# Attachments ORs

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- ❖ Additional MPA polling. “Rate the level of potential benefits associated with the new Attachments ORs.” **55% answered Significantly/Somewhat Improved Benefits**, 3% said No Change in Benefits, 3% indicated Somewhat/Significant Decreased Benefits, and **39% stated Don’t Know.**

# Attachments ORs: Additional Discussion

- ❖ WEDI asked the survey question: “Rate your level of agreement for the following statement: “New Attachment operating rules should be nationally mandated and implemented at the same time as the Electronic Health Care Attachment (275) transaction standard to decrease industry burden and cost and increase the value of the transaction.” **62.5% Strongly Agreed /Agreed**, 12.5% Neither Agreed nor Disagreed, and 6.3% Disagreed/Strongly Disagreed.
- ❖ Many of the MPA participants saw value in moving forward with an attachment standard and supporting operating rules at the same time. This could potentially shorten the overall implementation process (perhaps by a year or more) and assist organizations more effectively target the necessary resources.

## Adoption of the Updated and New ORs:

- ❖ WEDI asked participants at our MPA event the following question:  
“Overall, should WEDI recommend adoption of the updated and new Operating rules?” **32% indicated Yes-All of the Operating rules**, 20% indicated Yes-All Operating rules except for the Attachments Operating Rule\*, 20% indicated no, WEDI should not recommend adoption of the Operating rules, and 28% responded “Don’t Know.”

\*Note: the survey was conducted prior to release of the Attachments NPRM



# Thank You

Our full response to the NCVHS RFC can be  
accessed at [www.wedi.org](http://www.wedi.org)