



**HIPAA
TRANSACTIONS
HIPAA Summit IV
2002 UPDATE**

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- The information and views in this presentation do not represent official views of the U.S. Department of Health and Human Services

First HIPAA Rule

- Framework for all HIPAA requirements
- Definitions
- Process for updating standards
- HIPAA Dates:
 - Publication date: August 17, 2000
 - Effective date: October 16, 2000
 - Compliance date: October 16, 2002 or 2003

HIPAA Regulatory Structure

- 45 C.F.R. Part 160: All HIPAA
- 45 C.F.R. Part 162: Data Requirements
- 45 C.F.R. Part 164: Privacy

45 C.F.R. Part 160

- HIPAA rules apply to covered entities
- Definitions
- Preemption
- Compliance and Enforcement

HIPAA standards apply to covered entities:

- Health plans
- Health care clearinghouses
- Health care providers that conduct designated transactions electronically
- AND to those who conduct business for them (Business Associates)

Covered Entities Required To:

- Use HIPAA standards for designated transactions no later than appropriate compliance date via:
 - internal systems changes
 - clearinghouse
 - compliant business associate
- Use appropriate code sets in transactions
- Content-only exception for direct data entry

45 C.F.R. Part 162

- Subpart A--General Provisions
- Subpart I--General Transactions Provisions
- Subpart J--Code Sets
- Subparts K--R: Claims, Eligibility, Referrals, Claim Status, Enrollment & Disenrollment; Payment & Remittance Advice, Premium Payments, and Coordination of Benefits

Subpart I: General

- Updates process
- Requirements for covered entities and their business associates
- Trading partner agreements
- Exceptions process for testing proposed modifications

Business Associates

- Transactions Rule: 45 C.F.R. 162.923(c): requires a “business associate” of a covered entity to comply with all applicable requirements
- Privacy Rule: 164.502(e) and 164.504(e): parallel provision for privacy requirements

Trading Partners May Not:

- Change a standard definition, data condition, or use of a data element or segment
- Add data elements or segments to a maximum defined data set
- Use non-standard code or data elements
- Change the meaning or intent of the implementation specification

Subpart J: Code Sets

- Medical data code sets designated by Secretary
- Non-medical code sets are those recognized in the Implementation Specifications

Medical Code Sets

- ICD-9-CM for diagnosis
- ICD-9-CM for inpatient procedures
- NDC for drugs and biologics
- CDT for dental services
- HCPCS plus CPT-4 for physicians' and similar professional services
- HCPCS for non-physician outpatient items

Non-Medical Code Sets

- State abbreviations and ZIP Codes
- Telephone area codes
- Race and ethnicity codes
- Measurement systems
- And many many more

Subparts K-R: Two-Part Transactions Standards

- Defines each transaction in terms of
 - Action or purpose
 - Party or parties
- Adopts a particular implementation guide
 - generally or
 - for each of several specific sectors (e.g., retail pharmacy, institutional)
 - batch, real-time or interactive

Maintaining Standards

- Legislation recognizes need for updates
- Same process used for adoption of initial industry standards
- Modifications no more than every 12 months
- Minimum 180 day implementation period

45 C.F.R. 162.910

- Designated Standard Maintenance Organizations (DSMOs):
 - Standard setting organizations that maintain standards chosen as national standards and
 - the four consulting organizations
- Open process for complaints and updates
- Recommendations to the NCVHS

Guidance

- Websites
- Frequently Asked Questions
- WEDI: Strategic National Implementation Program (SNIP)

Future Actions

- First Transactions modifications
 - Corrections
 - Changes based on SDO reviews and DSMO process

Final HIPAA Rules To Come

- Employer Identifier
- Security
- National Provider Identifier
- Electronic Signature
- Privacy modifications

Proposed HIPAA Rules To Come

- National Plan Identifier
- Claims Attachments
- Annual modifications

Covered Entity To Do List

- Submit compliance plan if extension desired
- Work with IT staff and vendors
- Contact your business associates and trading partners
- Join WEDI/SNIP efforts
- Support SDOs
- Use the delay time to reach compliance

QUESTIONS???

Web Sites

- Model Compliance Plan and more
 - <http://www.cms.gov/hipaa>
- HIPAA Rules
 - <http://aspe.hhs.gov/admnsimp/>
- Washington Publishing Co.
 - <http://www.wpc-edi.com>

More Web Sites

- National Committee on Vital and Health Statistics:
 - <http://aspe.hhs.gov/ncvhs/>
- Workgroup on Electronic Data Interchange:
 - <http://wedi.org>
- WEDI/Strategic National Implementation Process:
 - <http://snip.wedi.org>