



Workgroup for  
Electronic Data  
Interchange



## TCS Hearing

- WEDI sponsored January 27, 2004
- Assess Implementation Status
- Determine Impact of Data Content Issues
- Evaluate Implementation Sequencing



# TCS Hearing - Findings

- Trading Partner Compliance
- Regulatory Issues
- Communications Issues
- Data Content Issues
- Cost and Benefit Issues



# TCS Hearing – Findings

- Trading Partner Compliance
  - Trading partner dependency critical path
  - Complexity of multiple testing partners
  - Software vendors not prepared
  - Addenda delayed testing
  - Test data issues
  - Lack of coordination
  - Medicare Cross-over



# TCS Hearing – Findings

- Regulatory Issues
  - Complexity of transition
  - Impact of Addenda and ASCA
  - Interpretation of technical requirement
  - Standards development process
  - System vendor compliance



## TCS Hearing – Findings

- Regulatory Issues ( continued)
  - Code set concerns
  - Trading partner agreements
  - Acknowledge and error reporting
  - Contingency plan impact
  - Complaint process



# TCS Hearing – Findings

- Communication Issues
  - Poor communication between covered entities
  - Need for authoritative source if information
  - Instruction in the Implementation Guides
  - Communication limitations as a barrier to testing



# TCS Hearing – Findings

- Data Content Issues
  - Incomplete data content
  - Difficulty in collecting data
  - Necessity of data content
  - Data Standards Maintenance Organization
  - Lack of unique identifiers





## TCS Hearing – Findings

- Cost and Benefit Issues
  - Transactions not fully utilized
  - Expense of implementation exceed expectations



# TCS Hearing – Recommendations

- Outline of WEDI Recommendations
  - Continue HHS policy of allowing contingency plans
  - Enhance implementation process
  - Revise and enhance standards development process
  - Validate cost and benefit of TCS implementation



## TCS Hearing – Recommendations

- Continue HHS policy of allowing contingency plans
  - Focus on full compliance while maintaining contingency
  - Focus effort on implementation of non-claim transactions
  - Continue effort on outreach



# TCS Hearing – Recommendations

- Enhance implementation process
  - Do less at one time in more realistic time frame
  - Phase implementation by entity and by transaction
  - Establish standard communication protocols
  - Develop standard test data



# TCS Hearing – Recommendations

- Enhance implementation process ( continued)
  - Pilot standard prior to issuance of final rule
  - Establish authoritative technical interpretation of implementation guides
  - Educate system vendors on need for adherence to TCS regulations



## TCS Hearing – Recommendations

- Revise & enhance standards development process
  - Enhance outreach for provider input into standards
  - Encourage business decision-makers to participate
  - Expedite process for correcting errors in standards
  - Develop solution for addressing COB data issues



# TCS Hearing – Recommendations

- Revise & enhance standards development process (continued)
  - Address data content coding assessment and revisions issues
  - Require the use of standard acknowledgement and error reporting
  - Conduct assessment of new technologies
  - Expedite implementation of unique identifiers



# TCS Hearing – Recommendations

- Validate cost and benefit of TCS implementation
  - Conduct realistic cost and benefit studies
  - Schedule review of such studies to ensure realization of net benefits
  - Identify further opportunities for achieving administrative simplification