

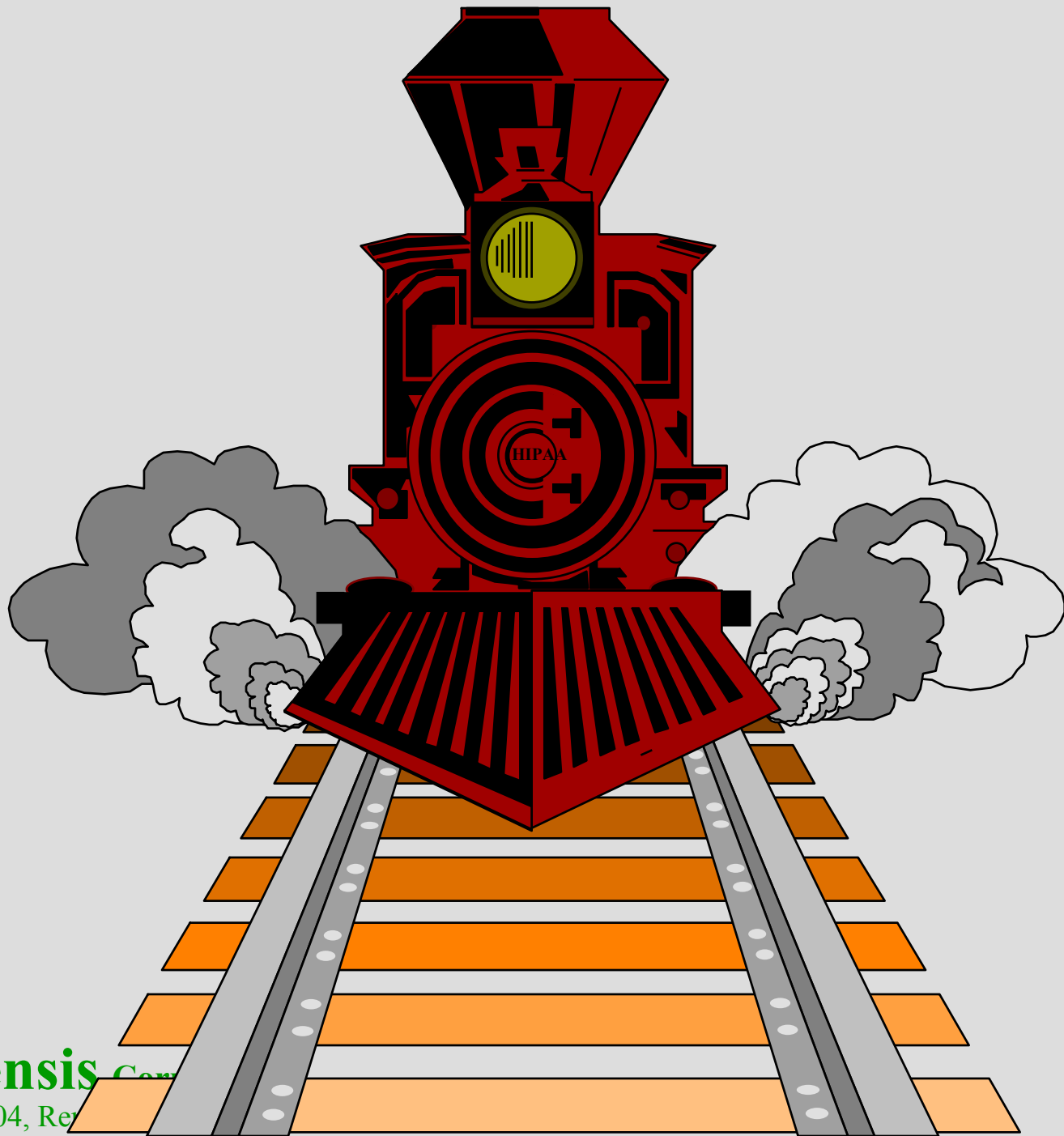
HIPAA Transactions

The Next Generation

13 September 2004

David. A. Feinberg, C.D.P.
President, Rensis Corporation
206 617-1717
DAFeinberg@computer.org

Intelligently Linking Information Systems



Today's Session

Objective: Provide information that allows impacted organizations to track and participate in future HIPAA TCS activities; thereby managing their futures

Topics:

- ✓ Materials Used in HIPAA TCS
- ✓ Processes for Creating Materials
- ✓ Status and Predictions

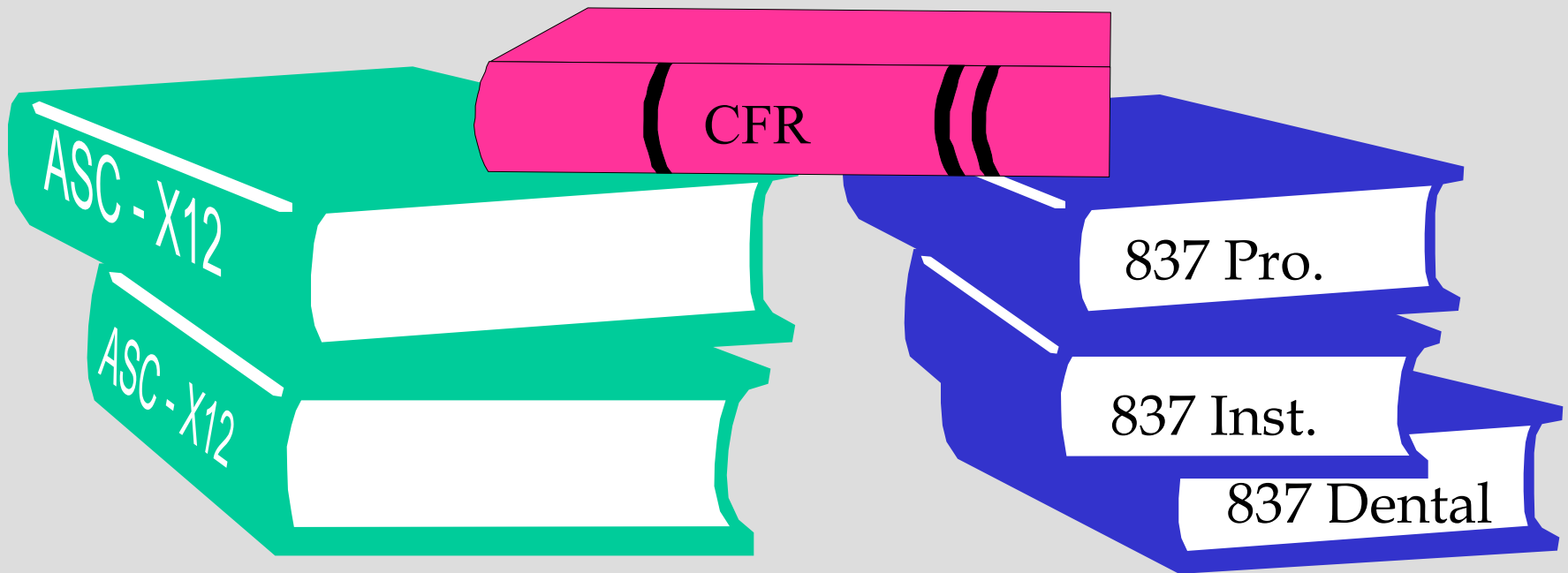


Caveats

For clarity and simplicity, today's discussion primarily illustrates the ANSI SDO processes of Accredited Standards Committee X12. Similar but differing processes also exist at other HIPAA SSO's.

The predictions contained in today's presentation are solely those of the author and do not represent the views, official or unofficial, of anybody else.

Materials

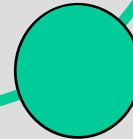


HIPAA Electronic Transactions

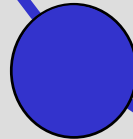
- Mandatory **Federal Regulations** [“Rules”]
which “adopt” and promulgate
- Voluntarily published X12 (and equivalent)
Type 3 Technical Reports (TR3’s)
a.k.a. “HIPAA Standards”
which define precise uses of
- Voluntarily published **X12 Standards**

THE HIPAA SOLAR SYSTEM

Federal Reg's



X12 Standards



X12 TR3's

X12 Standards

- Publication Cycle 3 times a year
- Publisher Data Interchange
 Standards Association
- Governing Materials Standing Doc. 2 (SD2)
- Authoring Entities X12N Workgroups
- Supporting Entities X12N / TG8 (Architecture)
 X12J (Tech. Assessment)
 Procedures Review Board
 (PRB)

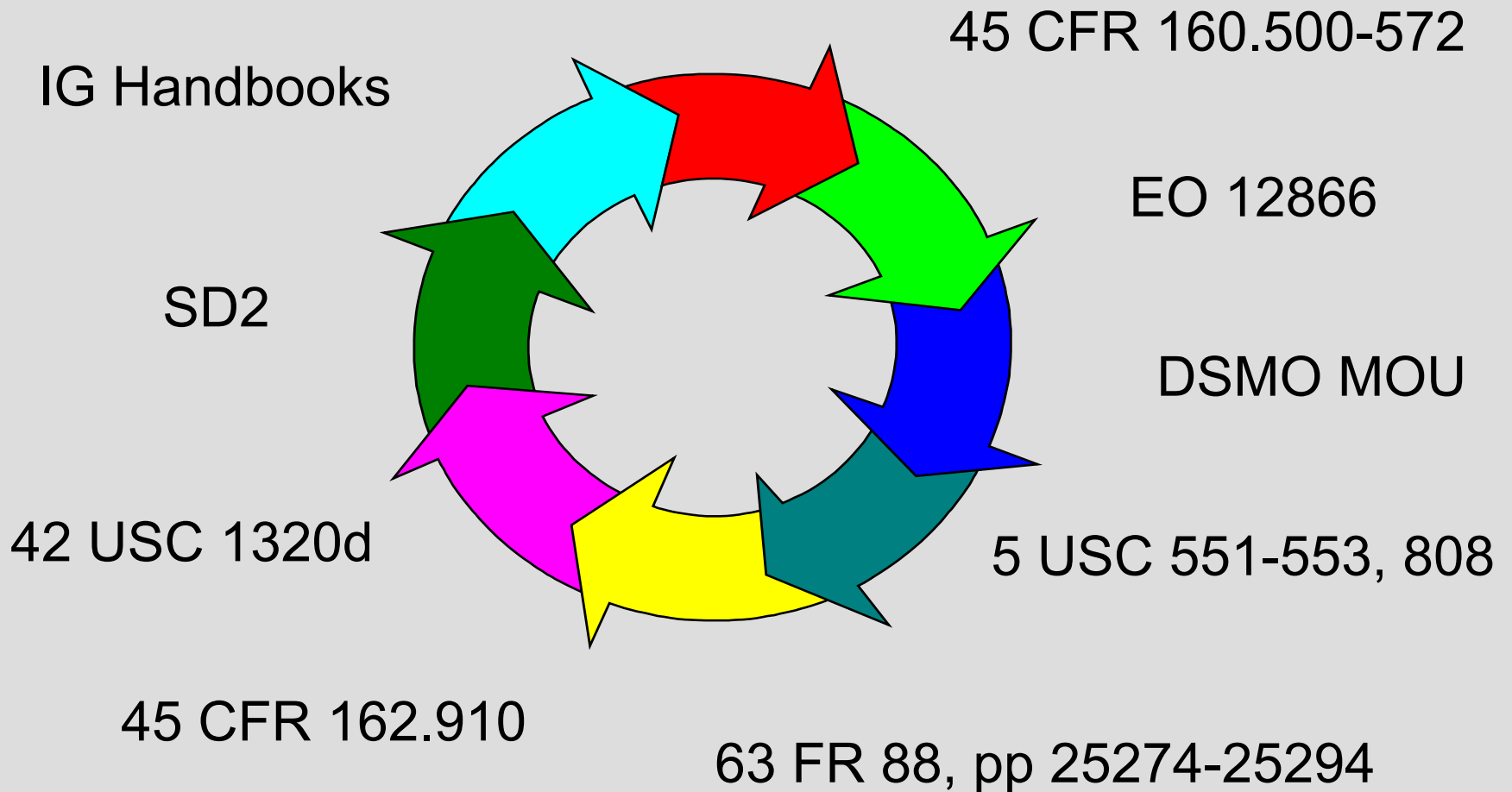
X12 Type 3 Technical Reports

- Publication Cycle not yet stabilized,
 trying for every 2 years
- Publisher Washington Publishing Co.
- Governing Materials IG Handbooks
- Authoring Entities X12N Workgroups
- Supporting Entities X12N / TG4 (IG Coord.)
 X12J (Tech. Assessment)

Federal Regulations

- Publication Cycle as recommended
- Publisher Government Printing Office
- Governing Materials HIPAA Legislation
Administrative Procedures Act
- Authoring Entity CMS' Office of HIPAA Stds.
- Supporting Entities DSMO Steering Committee
NCVHS

Processes



Transactions Processes

- Updating and creating new X12 standards
- Creating and modifying TR3's
- Adopting TR3's for HIPAA

Updating Standards


- X12 has two formal processes documented in Standing Document 2 (SD2)
 - Data Maintenance (DM)
 - For message structure, format, data element definitions, and internal code lists values
 - Can take many months or years
 - Code Maintenance Request (CMR)
 - For internal code lists values only
 - Expedited process to speed-up changes
 - Can still take 4 – 8 months

Creating and Modifying TR3's

- X12N process summary
 - Work groups within authoring task groups, in conjunction with Washington Publishing Company, establish schedule [including change request cutoff dates for various sources] and then create new TR3's
 - Following internal approvals for technical accuracy and proper process from supporting task groups, work groups commence X12N public comment period for new TR3's



Creating and Modifying TR3's

- X12N process summary
 - TR3's public comment period occurs
 - were 30 days; but being expanded to 60 days
 - Work groups resolve any issues raised during public comment period and make any needed adjustments to TR3's 
 - Work groups hold public Informational Forums during an X12 Trimester Meeting to confirm resolved issues and TR3's adjustments

Creating and Modifying TR3's

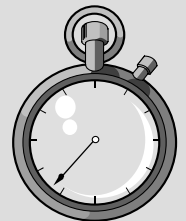
- X12N process summary
 - Work groups vote to move TR3's to task group for publication approval
 - Task groups [only TG2 – Healthcare, at present] vote to move TR3's to subcommittee X12N – Insurance for publication approval
 - X12N approves TR3's for publication
 - Any other affected X12 subcommittees approve TR3's for publication [*new for TR3's*]

Creating and Modifying TR3's

- X12N process summary
 - X12J – Technical Assessment subcommittee approves TR3's for publication [*new for TR3's*]
 - Washington Publishing Company publishes

Creating and Modifying TR3's

- X12N process timing
 - Overall IG and TR3 timing is, at present, variable
 - Focused effort is underway to manage volunteer resources and demands to establish two year TR3 publication cycle
 - Six approval slots every two years
 - Groups of TR3's – HIPAA and non-HIPAA – allocated to each slot on rotating schedule



Adopting TR3's for HIPAA

Two cycle process – first iteration

- **X12N** proposes new version of published Type 3 Technical Reports (TR3's)
- Designated Standards Maintenance Organizations (**DSMO**) Steering Committee approves new version
- National Committee on Vital and Health Statistics (**NCVHS**) recommends new version

Adopting TR3's for HIPAA

- Centers for Medicare and Medicaid Services (**CMS**) prepares Notice of Proposed Rule Making (**NPRM**) announcing new version
- Department of Health and Human Services (**DHHS**) clears NPRM
- Other affected federal agencies (e.g., Office of Management and Budget) approve NPRM

Adopting TR3's for HIPAA

- NPRM is published in Federal Register
- Public comment period occurs
 - normally 60 days
- CMS, with any needed support from DSMO Steering Committee, X12N, *et. al.*, analyzes comments received about NPRM

Adopting TR3's for HIPAA

Two cycle process – second iteration

- Based on received comments, if necessary, X12N incorporates changes into next published new version of TR3's ?
- DSMO Steering Committee approves new version
- NCVHS recommends new version
- CMS prepares Final Rule promulgating new version

Adopting TR3's for HIPAA

- DHHS clears Final Rule
- Other affected federal agencies (e.g., OMB) approve Final Rule

Adopting TR3's for HIPAA

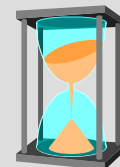
- Final Rule is published in Federal Register
 - Specifies explicit **Effective Date**
[Effective Date also known as **Adoption Date**]
 - Specifies explicit **Compliance Date(s)**
- For an existing HIPAA standard, any **Effective Date** for a modified standard must be at least 12 months following any previous Effective Date

Adopting TR3's for HIPAA

Effective Date occurs no earlier than the end of mandatory Congressional Review period which is normally 60 days

Compliance Date(s)

- **New Standards** – 24 months after Effective Date; small health plans get 36 months
- **Modified Standards** – established within the Final Rule, but must be at least 180 days after Effective Date



Status and Predictions



as of 16 August 2004

David A. Feinberg, C.D.P.

- Consultant and Teacher -- Healthcare Interfaces and EDI
- Author, “Understanding HIPAA Communications”
- Member, Accredited Standards Committee X12 and its Insurance Subcommittee (X12N)
- Member, Health Level Seven (HL7)
- Co-Chair, X12N HIPAA Implementation Work Group
- Member, HL7 Attachments Special Interest Group (ASIG) and X12N Patient Information Work Group (TG2/WG9)
- Member, HL7 Imaging Integration Special Interest Group (IISIG) and DICOM Image Integration Group (WG20)
- Member, concluded HL7 Master Person Index Mediation Special Interest Group (MPISIG)
- Commercial and Technology Arbitrator, American Arbitration Association



Transactions Futures

- Claims Attachments
- New Versions of Current Transactions
- Potential New Transactions

Claims Attachments

- Defined by HL7 Attachments Special Interest Group (ASIG) in “Specifications”
- Presently planned to incorporate XML within EDI; *i.e.*,
 - X12's 275 transaction ... *contains*
 - HL7's Clinical Document Architecture (CDA) ... *made up of*
 - Structured data elements,
 - Narrative, unstructured, text, and/or
 - Scanned, non-diagnostic, images [many formats]

Claims Attachments

- First Round
 - Ambulance
 - Emergency Department
 - Rehabilitative Services
 - Laboratory Results
 - Medications
 - Clinical Notes



Claims Attachments

- Status
 - X12 and HL7 materials ready ... again
 - CMS working to issue NPRM
 - Industry proofs of concepts to be requested
 - Lessons from proofs of concepts expected to be fed back to update X12 and HL7 materials for use in final rule

New Versions of Current Txns.

- X12 version 004010 + 004010A1
Implementation Guides (IG's) are current HIPAA standards
- X12 version 004050 counterpart IG's approved for publication during 2003
 - Not presently planned to be generally proposed as modified HIPAA standards
 - Contain additional useful explanations that can be applied to current HIPAA standards

New Versions of Current Txns.

- Writing of X12 version 005010 counterpart TR3's now underway
 - Some change requests still being considered, but don't procrastinate
 - Planned changes include
 - Additional useful explanations
 - Accumulated and timely new routine requests
 - National Provider Identifier (NPI) adaptations
 - Planned changes do not at this time include
 - ICD-10 modifications

New Versions of Current Txns.

- Writing of X12 version 005010 counterpart TR3's now underway
 - Presently targeted for publication in stages during 2005 - 2006
 - Tentatively planned to be proposed for reference in NPRM for modified HIPAA standards: 2006 - 2007 - 2008?!
 - Volunteers welcomed! *Contact me if you'd like further information.*

New Versions of Current Txns.

005010 TR3 Public Comment Periods

<i>Projected X12</i> <u>TR3 Comment</u> <u>Period</u>	<u>HIPAA Counterpart</u> <u>Transactions</u>	<u>Other, beyond HIPAA,</u> <u>Healthcare Transactions</u>
Oct. – Nov. 2004		824 Acknowledgements
Dec. – Jan. 2004 2005	837 Professional Claim 837 Institutional Claim 837 Dental Claim	837 Data Reporting
Feb. – Mar. 2005	835 Remittance Advice 834 Enrollment	274 Provider Directory 274 Provider Inquiry - 4050

continued on next slide ...

New Versions of Current Txns.

005010 TR3 Public Comment Periods

<i>Projected X12</i> <u>TR3 Comment</u> <u>Period</u>	<u>HIPAA Counterpart</u> <u>Transactions</u>	<u>Other, beyond HIPAA,</u> <u>Healthcare Transactions</u>
June – July 2005	270/271 Eligibility Inq. & Resp. 278 Auth. Req. Review & Resp. 820 Premium Payment	278 Auth. Serv. Review Notice 278 Auth. Inquiry & Response 277 Claim Acknowledgement 274 Provider Information 824 Acknowledgements - 4010
Oct. – Nov. 2005	276/277 Claim Status	271 Roster 269 Benefit Verification 277 Req. for Additional Info. 275 Claim Attachment 275 Auth. Attachment 274 Provider Credentialing

Potential New Transactions

Acknowledgement	[824,277]
Coordination of Benefit Confirmation	[269]
Provider Information	[274]
Eligibility / Enrollment Roster	[271]
Referral Attachments	[275]
Additional Claims Attachments	[HL7 CDA]
...	

Any HIPAA adoption activities will only begin
by prior industry acceptance, use, and request

HIPAA Transactions

The Next Generation

Further Information

- Rensis Corporation Seminar:
“HIPAA TCS – What’s Next? Products, Processes, and Prognostications”
- Feinberg’s Free Focused HIPAA Mailing List
 - *Send e-mail request to* DAFeinberg@computer.org
 - *Subscribe to* HIPAA-TCS@yahoogroups.com
 - *Subscribe to* ShareHIPAA@yahoogroups.com

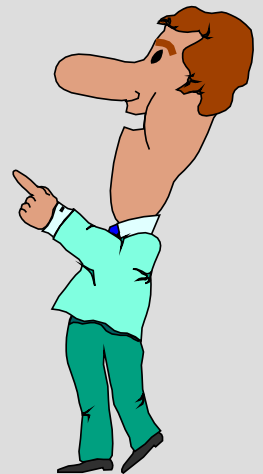
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Comments?

Questions?

Smart Remarks?



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David. A. Feinberg, C.D.P.

President, Rensis Corporation

3662 SW Othello Street

Seattle, Washington 98126-3246

206 617-1717

DAFeinberg@computer.org