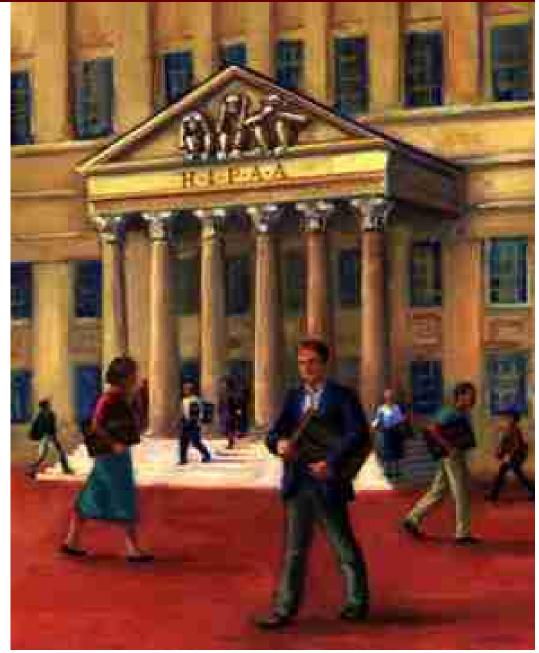
The Ninth National HIPAA Summit[™]

The Leading Forum on Healthcare Privacy, Confidentiality, Data Security and HIPAA Compliance

HIPAA Transactions Testing Update

Kepa Zubeldia, M.D. September 13, 2004 claredi

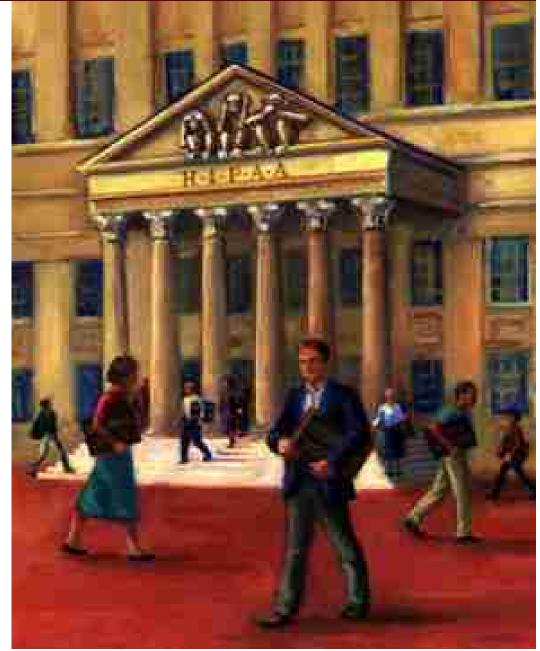


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HIPAA Transactions Convergence

Kepa Zubeldia, M.D. September 13, 2004 claredi



Topics

redi

- Before HIPAA The HIPAA goal
- Reality today
- Companion Guide Portal
- Progress Report
- Convergence Project
- Open invitation

The HIPAA Law (1996)

"SEC. 1175. (a) CONDUCT OF TRANSACTIONS BY PLANS.— "(1) IN GENERAL.—If a person desires to conduct a transaction referred to in section 1173(a)(1) with a health plan as a standard transaction—

"(A) the health plan may not refuse to conduct such transaction as a standard transaction;

"(B) the insurance plan may not delay such transaction, or otherwise adversely affect, or attempt to adversely affect, the person or the transaction on the ground that the transaction is a standard transaction; and

"(C) the information transmitted and received in connection with the transaction shall be in the form of standard data elements of health information.

Transactions NPRM, May 17 1998

"The health care industry recognizes the benefits of EDI and many entities in that industry have developed proprietary EDI formats. Currently, there are about 400 formats for electronic health care claims being used in the United States. The lack of standardization makes it difficult to develop software, and the efficiencies and savings for health care providers and health plans that could be realized if formats were standardized are diminished."

Final Rule, Transactions, August 17, 2000

"In addition, we disagree with commenters that we should add a new "usage" statement, "not required unless specified by a contractual agreement," in the implementation guide. We believe that the usage statement would have the same effect as allowing trading partners to negotiate which conditional data elements will be used in a standard transaction. Each health plan could then include different data requirements in their contracts with their health care providers. Health care providers would then be required to use a variety of guidelines to submit transactions to different health plans. This would defeat the purpose of standardization." (Page 50323)

§ 162.915 Trading partner agreements.

A covered entity must not enter into a trading partner agreement that would do any of the following: (a) Change the definition, data condition, or use of a data element or segment in a standard. (b) Add any data elements or segments to the maximum defined data set. (c) Use any code or data elements that are either marked "not used" in the standard's implementation specification or are not in the standard's implementation specification(s).

(d) Change the meaning or intent of the standard's implementation specification(s).

High expectations from HIPAA

The HIPAA standard transactions will be acceptable to all covered entities (payers and clearinghouses)

 If a provider or clearinghouse sends a claim that meets the HIPAA Standard (IG) then the payer is required to accept it without imposing additional requirements.

The Reality Today

There are many additional requirements imposed by the payers

- Contractual
- Other laws and regulations
- Telecommunications
- Implementation restrictions
- Data formatting requirements
- Data content requirements
- Most additional requirements are reasonable

Examples of Requirements

- Used / not used segments and elements
 Functionality not yet implemented
- Data formatting requirements
 - No punctuation in names and addresses
 - Maximum of xx bytes in patient account number
 - Dollar amounts must have trailing ".00"
- Data content requirements
 - Provider identifiers (may go away with NPI)
 - Anesthesia units or minutes
 - Specific provider name spelling
 - Unique code set restrictions, procedure modifiers, etc.

Where are these requirements?

- Payer HIPAA "Companion Guides"
- Provider Bulletins and Newsletters
- Instructions for filing different types of claims
 DME, Anesthesia, Home Health, Ambulance, etc.
- Joe's head
- Does anybody know why we require this?

How many sets of requirements?

- Before HIPAA
 - Transactions NPRM reports 400 formats in use
 - Proprietary formats under the control of each payer or clearinghouse
- After HIPAA
 - Three standard X12 formats for claim + NCPDP
 - National standard, not under the control of any one payer or clearinghouse
 - Claredi has identified 980 "Companion Guides" as of September 1, 2004 for the X12 HIPAA transactions. Number keeps growing.



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Claredi's Companion Guide Portal

- Free resource on the Internet
- Lists all the companion guides we have identified, with version number and date
- Links to the guides themselves
 - Only for guides available through the Internet (65%)
 - Some guides are restricted distribution
- Next task: locate the NCPDP "Payer Sheets"

Statistics as of September 1, 2004

• 837P – 262

• 835 – 12

- 837I 223
- 837D 76
- 270 46
- 276 51
- 278 Request 22
- 834 13
- 820 12

- 271 36
- 277 42
- 278 Response 12

Final Rule, Transactions, August 17, 2000

"In addition, we disagree with commenters that we should add a new "usage" statement, "not required unless specified by a contractual agreement," in the implementation guide. We believe that the usage statement would have the same effect as allowing trading partners to negotiate which conditional data elements will be used in a standard transaction. Each health plan could then include different data requirements in their contracts with their health care providers. Health care providers would then be required to use a variety of guidelines to submit transactions to different health plans. This would defeat the purpose of standardization." (Page 50323)

But...

- Companion guides don't tell the whole story
 - Many edits are not documented in the guides
 - Some guides' requirements are not enforced
- Reading the guides is very difficult
 - Most providers' offices can't read more than 2-5
 - Most vendors won't implement more than 2-5
 - Medicare, Medicaid(s), Blues
- There has to be an easier way
- How do we help in converging these requirements into common requirements?





Claredi's Convergence Project

- To help the healthcare industry converge on a manageable set of requirements for the HIPAA transactions
- To help identify the divergent requirements
- To automate the identification of requirements in a machine processable format
- To provide a convergence model usable for other transactions like those in the NHII
- Free, open to the entire industry

Convergence \rightarrow Interoperability

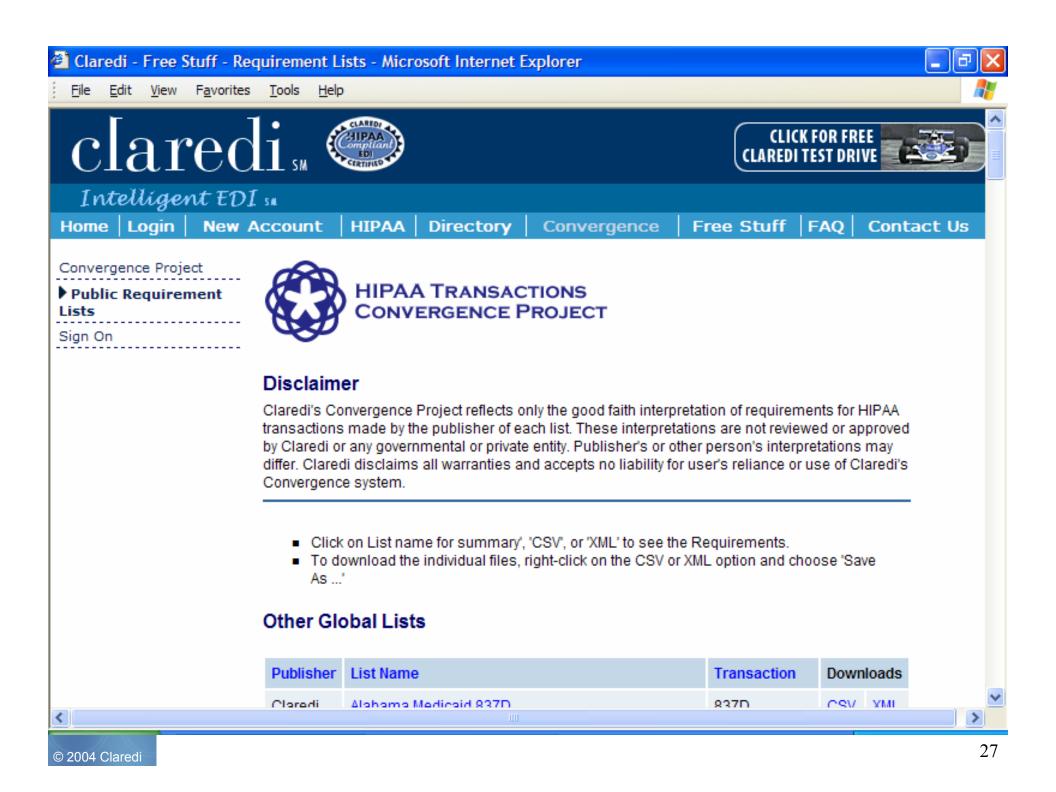
- Data Content standards driven by NUBC, NUCC, ADA DeCC, NCPDP, WEDI, others
 - Industry should adopt these standards as reference point, or "target for convergence"
- Feedback mechanism: compare transaction requirements among participants
 - Deviation from requirements defined by Content Committees, industry associations and others
 - Deviation from other requirement from same payer
 - Deviation from requirements from other payers

HIPAA Convergence Requirements Lists

- General Convergence Lists
 - Define common requirements as target for convergence
 - Bill type
 - Type of claim
 - Lists defined by NUBC, NUCC, DeCC and NCPDP for the entire industry
- Payer Specific Lists
 - Defined by each payer for their own needs
 - Concise, limited only to payer-specific needs
 - Does not replace companion guides. Supplements them.
 - Eventually these lists **should go away** (Probability 0%)







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					Clared	di	Alabama Medicaid 837I	8371	X096A1	CSV	XML
					Clared	di	Alabama Medicaid 837P	837P X098/	41	CSV	XML
					Clared	di	Alaska Medicaid 837D	837D X097/	41	CSV	XML
					Clared	di	Alaska Medicaid 837l	8371	X096A1	CSV	XML
					Clared	di	Alaska Medicaid 837P	837P X098/	A1	CSV	XML
					Clared	di	Anthem Blue Cross and Blue Shield of Virginia 837D	837D X097/	A1	CSV	XML
					Clared	di	Anthem Blue Cross and Blue Shield of Virginia 8371	8371	X096A1	CSV	XML
					Clared	di	Anthem Blue Cross and Blue Shield of Virginia 837P	837P X098/	41	CSV	XML

Anthem MidWest 837D

Anthem MidWest 8371

Anthem MidWest 837P

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	Claredi	Bill Type 11x Hosp. Inpatient, discharged (non- Medicare)	8371	X096A1	CSV	XML	
	Claredi	Bill Type 11x Hosp. Inpatient, not discharged (Medicare non-PPS)	8371	X096A1	CSV	XML	
	Claredi	Bill Type 11x Hosp. Inpatient, not discharged (Medicare PPS)	8371	X096A1	CSV	XML	
	Claredi	Bill Type 11x Hosp. Inpatient, not discharged (non- Medicare)	8371	X096A1	CSV	XML	
	Claredi	Bill Type 12x Hospital - Inpatient (Medicare Part B only)	8371	X096A1	CSV	XML	
	Claredi	Bill Type 13x Hospital - Outpatient	8371	X096A1	CSV	XML	
	Claredi	Bill Type 14x Hospital - Other	8371	X096A1	CSV	XML	
	Claredi	Bill Type 17x Hospital - Subacute Inpatient	8371	X096A1	CSV	XML	
	Claredi	Bill Type 18x Hospital - Swing Beds, discharged	8371	X096A1	CSV	XML	
	Claredi	Bill Type 18x Hospital - Swing Beds, not discharged	8371	X096A1	CSV	XML	
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Cla	redi File name: RequirementList.xml File type: XML Document	371 X096A1	CSV XML	
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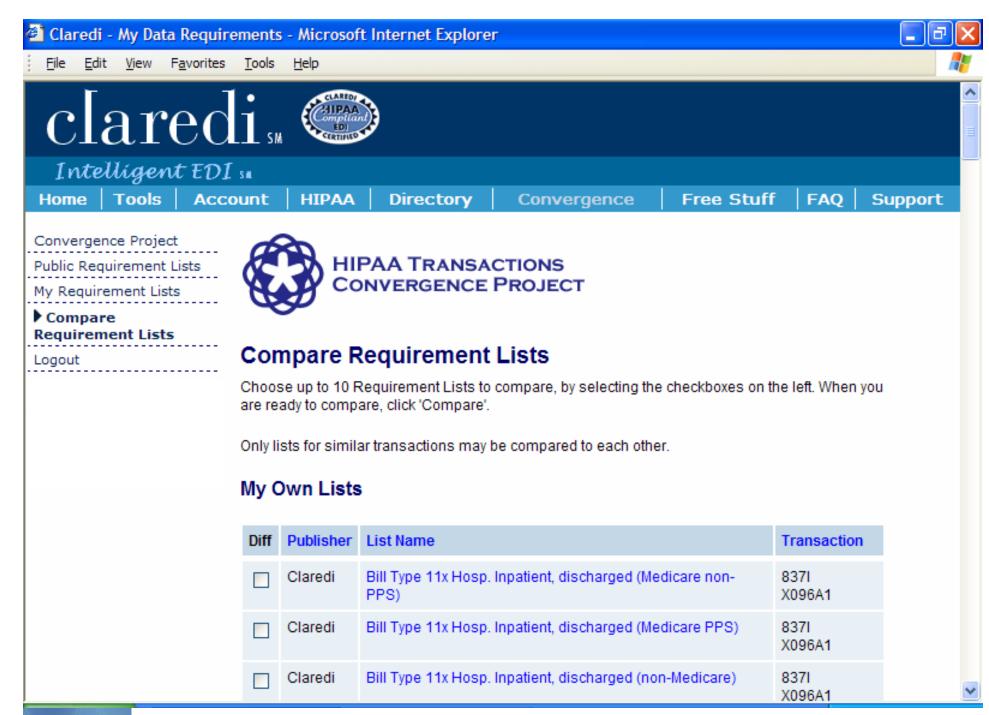
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					8371.2000C.2300.CLM.CLM18	Claim Explanation Of Benefits Indicator	
					8371.2000C.2300.CLM.CLM20	Claim Delay Reason Code	
				 ✓ 	837I.2000C.2300.DTP.DTP03	Claim Discharge Hour	
					8371.2000C.2300.DTP.DTP03	Claim Statement From Or To Date- R D8	
					8371.2000C.2300.DTP.DTP03	Claim Statement From Or To Date- D8	
				~	837I.2000C.2300.DTP.DTP03	Claim Admission Date And Hour	
				v	837I.2000C.2300.CL1.CL101	Claim Admission Type Code	
				v	837I.2000C.2300.CL1.CL102	Claim Admission Source Code	
				v	837I.2000C.2300.CL1.CL103	Claim Patient Status Code	
					837I.2000C.2300.PWK.PWK01	Claim Attachment Report Type Code	
					8371.2000C.2300.PWK.PWK02	Claim Attachment Transmission Code	
					837I.2000C.2300.PWK.PWK06	Claim Attachment Control Number	
					837I.2000C.2300.PWK.PWK07	Claim Attachment Description	
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					Claredi	Bill Type 11x Hosp. Inpatient, discharged (non-Medicare)	837I X096A1
					Claredi	Bill Type 11x Hosp. Inpatient, not discharged (Medicare non- PPS)	837I X096A1
					Claredi	Bill Type 11x Hosp. Inpatient, not discharged (Medicare PPS)	837I X096A1
					Claredi	Bill Type 11x Hosp. Inpatient, not discharged (non-Medicare)	837I X096A1
					Claredi	Bill Type 12x Hospital - Inpatient (Medicare Part B only)	837I X096A1
					Claredi	Bill Type 13x Hospital - Outpatient	837I X096A1
					Claredi	Bill Type 14x Hospital - Other	837I X096A1
					Claredi	Bill Type 17x Hospital - Subacute Inpatient	837I X096A1
					Claredi	Bill Type 18x Hospital - Swing Beds, discharged	837I X096A1
					Claredi	Bill Type 18x Hospital - Swing Beds, not discharged	8371

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					Claredi	ODJFS Claims - COB	NCPD	P B1	
					Claredi	ODJFS Claims - DUR / PPS	NCPD	P B1	
					Claredi	OKMMIS Claims Required Data - Not Compound	NCPD	P B1	
					Claredi	OKMMIS Claims Required Data - Compound	NCPD	P B1	
					Claredi	OKMMIS Claims Required Data - HMO Provider ID	NCPD	P B1	
					Claredi	OKMMIS Claims - COB	NCPD	P B1	
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Name	Bill Type 11x Hosp. Inpatient, discharged (Medicare PPS)	Bill Type 12x Hospital - Inpatient (Medicare Part B only)	Bill Type 13x Hospital - Outpatient	Bill Type 14x Hospital - Other
Claim Type Of Bill Facility Type Code	Required Equal To (String) (11)	Required Equal To (String) (12)	Required Equal To (String) (13)	Required Equal To (String) (14)
Claim Type Of Bill Claim Frequency Code	Required Equal To (String) (1)	Required Not Equal To (String) (2,3,4,6,9,A,B,C,D,E)	Required Not Equal To (String) (6,9,A,B,C,D,E)	Required Not Equal To (String) (2,3,4,6,9,A,B,C,D,E)
Claim Discharge Hour	Required Presence of Element	Not Allowed	Not Allowed	Not Allowed
Claim Statement From Or To Date- D8				Required Presence of Element
Claim Statement From Or To Date-R D8				Not Allowed
Claim Admission Date And Hour	Required Presence of Element	Required Presence of Element	Required Presence of Element	Required Presence of Element
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	Home Health Mental Status Code1	Not Allowed	Not Allowed	Not Allowed	Not Allowed	
	Claim Principal Diagnosis Code	Required Presence of Element	Required Presence of Element	Required Presence of Element		
	Claim Admitting Diagnosis Reason For Visit-BJ	Required Presence of Element	Not Allowed			
	Claim Admitting Diagnosis Reason For Visit-ZZ	Not Allowed	Required Presence of Element			
	Claim Diagnosis Related Group Code		Not Allowed	Not Allowed	Not Allowed	
	Claim Principal Procedure Code-BP	Not Allowed	Not Allowed	Not Allowed	Not Allowed	
	Claim Other Procedure Code1-BO	Not Allowed	Not Allowed	Not Allowed	Not Allowed	
	Claim Treatment Code1	Not Allowed	Not Allowed	Not Allowed	Not Allowed	

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	Claim Treatment Code1	Not Allowed	Not Allowed	Not Allowed	Not Allowed	
	Claim Days Count-LA	Required Presence of Element		Not Allowed	Not Allowed	
	Claim Days Count-CA	Required Presence of Element	Not Allowed	Not Allowed	Not Allowed	
	Claim Days Count-NA	Required Presence of Element		Not Allowed	Not Allowed	
	Claim Days Count-CD	Required Presence of Element		Not Allowed	Not Allowed	
	Home Health Discipline Type Code	Not Allowed	Not Allowed	Not Allowed	Not Allowed	=
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				Claredi	Blue Cross Blue Shield of Alabama 837D	837D	X097A1	
				Claredi	List Name 43	8371	X096A1	
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				Claredi	ODJFS Claims Required Data - Compound	NCPD	P B1	
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				Claredi	ODJFS Claims - DUR / PPS	NCPD	P B1	
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				Claredi	OKMMIS Claims Required Data - HMO Provider ID	NCPD	P B1	
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Convergence Project Requirements Lists

- Will be published by NUBC, NUCC, ADA DeCC and NCPDP
- Payers should publish their own specific lists
- Claredi provides the infrastructure
 - Free industry access to requirement list database
 - Each list publisher maintains its own lists
- Claredi will define initial set of payer-specific lists as part of our Companion Guide implementations, to seed the directory



The goal: Convergence

- A single web portal where the companion guides can be referenced and the requirements can be published
- Easy to read and understand requirements lists
- Downloadable in machine readable format (XML, CSV)
- Easy to compare requirements among lists
- Does not replace Companion Guides
- Ultimate goal is **convergence** of requirements
 - Only lists that should remain are the NCPDP, ADA DeCC, NUBC and NUCC-defined lists (Probability 0%)
- Free access to the industry
- Open invitation to participate to all interested parties

Questions?

redi

Kepa.Zubeldia@claredi.com

Convergence Project URL

http://www.claredi.com/convergence

