

THE HIPAA COLLOQUIUM at Harvard University



Implementation Guide Change Process (DSMO)

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Chair: X12N Insurance Subcommittee



HIPAA Implementation Guides

- Implementation Guides Cannot change more frequently than once per year
 - X12 Standards change 3 times per year
- Any healthcare stakeholder can request changes including:
 - Providers
 - Payers
 - Clearinghouses
 - Healthcare Industry Representatives
 - Federal / State Government

HIPAA Implementation Guides

National Committee on Vital and Health Statistics

- Public advisory body to the Secretary HHS
- Composed of 18 individuals from the private sector
- Public meetings and hearings

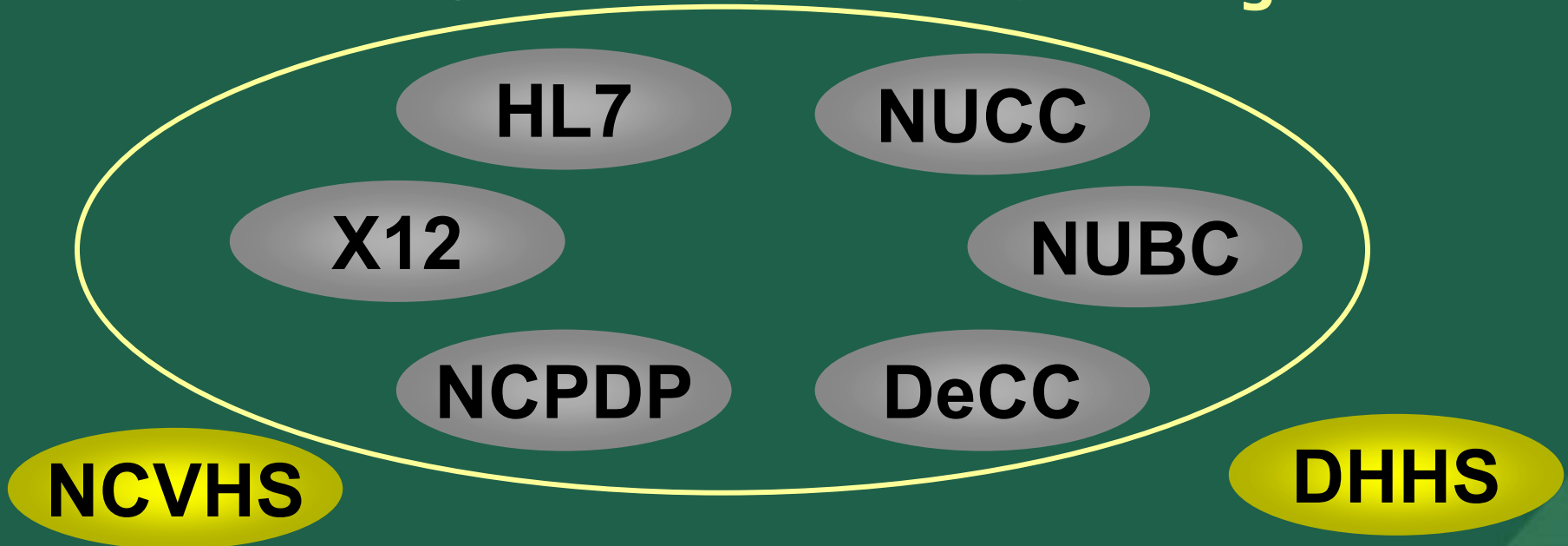
The logo for the National Committee on Vital and Health Statistics (NCVHS). It features the acronym "NCVHS" in white, bold, sans-serif capital letters on a purple rectangular background. Below the text is a stylized graphic consisting of several curved, overlapping lines in shades of purple and grey, suggesting a wave or a path.

<http://ncvhs.hhs.gov/>

Change Request Coordination ?

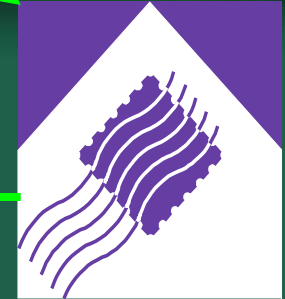
- 3 ANSI Standards Organizations
- 3 Data Content Committees
- DHHS / NCVHS

Memorandum of Understanding



Implementation Guide / Data Content Change Request

<http://www.hipaa-dsmo.org>



10 Business Days to Express Interest

X12

HL7

NCPDP

NUBC

NUCC

DeCC

90 Days to develop organizational Recommendation (45 Day Extension If Needed)

X12

HL7

NCPDP

NUBC

NUCC

DeCC

Approved Changes

X12

Approved Changes

HL7

Approved Changes

NCPDP



Requesting A Change

1. Choose the Implementation Guide
2. State the Business Case for Change Request
3. Provide a suggested change to meet Business Case

**External Code List
Changes**



IG Appendix C – Code List Maintainers



MOU Guiding Principals

1. Public Access – Single Point of Entry
2. Timely Review of Change Requests
3. Cooperation and Communications
4. Consider All Viewpoints
5. Evaluate Impact of Change Requests
6. Maintain a National Perspective
7. Conform to Legislation and Regulatory Process

A photograph of footprints on a sandy beach, with the sand appearing to ripple and flow. The footprints are scattered across the left side of the slide, leading from the top left towards the bottom left. The background of the slide is a dark green gradient.

Next Steps...

- Annual DSMO Report to NCVHS - Recommendations
- NCVHS Review & Recommendations to HHS
- HHS
 - **Initiate the Federal Regulatory Process**
 - Draft NPRM
 - NPRM Internal Clearance
 - Publish NPRM – Federal Register
 - Public Comment Period (30 – 60 days)
 - Response to Comments
 - Draft Final Rule
 - Final Rule Internal Clearance
 - Publish Final Rule – Federal Register
 - 30-60 day Congressional Review Period
 - Final Rule Includes the compliance date
 - **Cannot be less than 180 days**

SUMMARY

- Process and timeline for IG Changes
- Frequently Asked Data Base
- Participate!
- Questions



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