

HIPAA EDI Standards The Change Request Process

Maria Ward
PriceWaterhouseCoopers, LLP
Healthcare Consulting Practice
Chair, DSMO Steering Committee
CoChair, HL7 Attachment SIG
Member, NUCC



Glossary of terms:

- 1. <u>ASC X12 N</u> (Accredited Standards Committee X12, Insurance Sub Committee(N). An American National Standards Institute (ANSI) accredited standards development organization.
- 2. <u>HL7</u> (Health Level Seven) an ANSI accredited standards development organization whose focus is on clinical information.
- 3. <u>NCPDP</u> (National Council for Prescription Drug Programs) an ANSI accredited standards development organization whose focus is on retail pharmacy information.
- 4. <u>NUCC</u> (National Uniform Claim Committee) Committee comprised of stakeholders throughout the healthcare industry who deals with healthcare data issues, particularly as they affect the physician provider community. NUCC is also a named advisor to the Secretary of HHS in HIPAA.

Glossary of terms:

- 5. <u>NUBC</u> (National Uniform Billing Committee) Committee comprised of stakeholders throughout the healthcare industry who deals with healthcare data issues, particularly as they affect the Institutional / facility provider community. NUBC is also a named advisor to the Secretary of HHS in HIPAA.
- 6. <u>DeCC</u> (Dental Content Committee) Committee comprised of stakeholders throughout the healthcare industry who deals with healthcare data issues that affect the dental provider community.
- 7. <u>NCVHS</u> (National Committee on Vital and Health Statistics) An external advisory committee to the Secretary of HHS. NCVHS advises HHS on many national issues affecting healthcare. NCVHS was charged with advising HHS on HIPAA related issues and has been very active in this role.

Glossary of terms:

- 8. <u>CRS</u> (Change Request System) The system used by the public to enter requests for changes to the HIPAA EDI implementation guides.
- 9. <u>DSMO</u> (Designated Standards Maintenance Organizations). The six organizations named by HHS as responsible for maintaining the HIPAA EDI implementation materials.

Designated Standards Maintenance Organizations (DSMOs)

Named in Federal Register Notice 8/17/00

- Purpose: To work together to maintain the HIPAA EDI implementation materials named in the Final Rule(s)
- Includes requests for new code sets to be named as HIPAA code sets
- Process also requires that the NCVHS hear recommendations from DSMOs on an annual basis



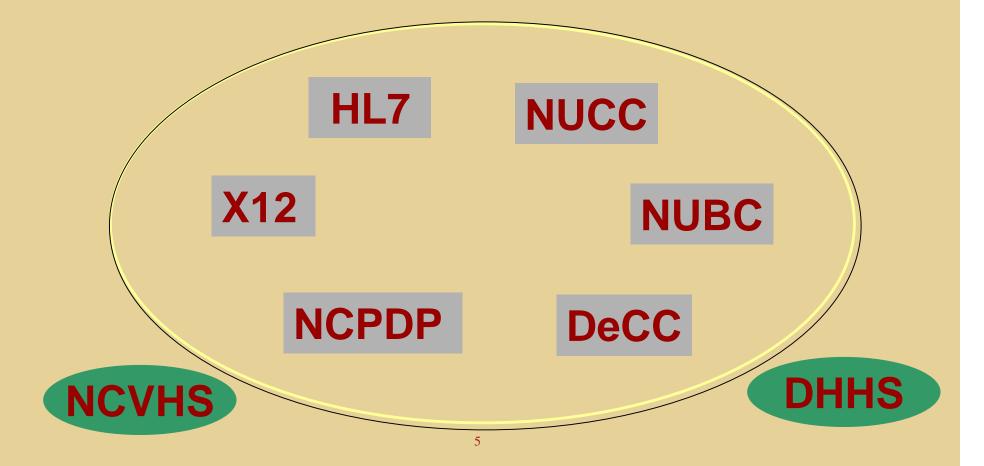




Change Request Coordination

Operating according to the...

Memorandum of Understanding



DSMO process effective date:

- ✓ MOU was signed by all organizations on 3/31/2000. The process became effective October 16, 2000
- ✓ First batch of requests (5 total) was issued to the DSMOs from the CRS on 12/5/2000
- In accordance with the guiding principles established by HHS, the process provides for:
 - ✓ Open public access
 - ✓ Coordination among DSMO's
 - ✓ An appeals process
 - ✓ Expedited process to address content needs if appropriate
 - ✓ Recommendation to NCVHS



❖The DSMO's have...

Collaborated on creating a process and web based system to:

- ✓ Maintain standards adopted under the Final Rule for Transactions and Code Sets (section 162.910)
- ✓ Receive and process requests for adopting a new standard or modifying an adopted standard (section 162.910)
- ✓ Receive and process requests for adopting new code sets as HIPAA standard code sets

HIPAA Implementation Guides

- Cannot change more frequently than once per year
- Any healthcare stakeholder can request changes including:
 - ✓ Providers
 - ✓ Payers
 - ✓ Clearinghouses
 - ✓ Healthcare Industry Representatives
 - ✓ Federal / State Government

Requesting A Change...

- 1. Choose the Implementation Guide or select "more than one or don't know"
- 2. State the Business Case for Change Request
- 3. Provide a suggested change to meet Business need



IG Appendix C – Code List Maintainers

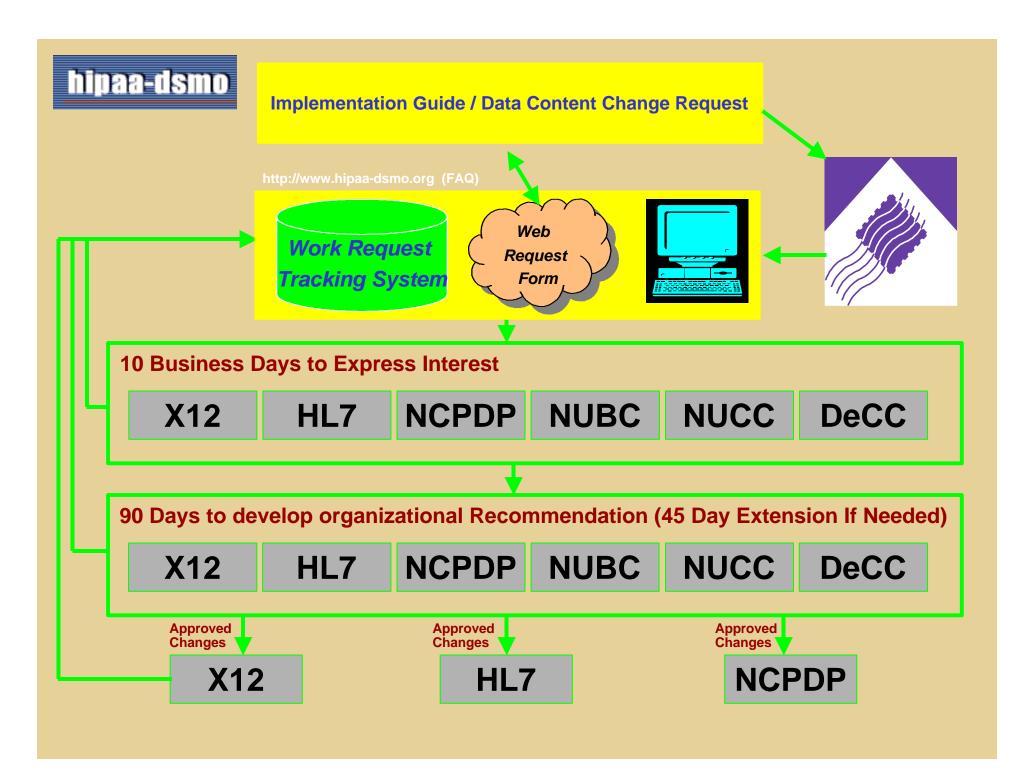
Considering the change requests

- 1. On the 5th business day of each month requests are batched and sent to DSMOs
- 2. DSMOs have 10 days to "opt in"
- 3. Next 90 period is for DSMOs to develop recommendation
- 4. Every month DSMO Steering Committee meets to discuss and vote on recommendations for prior 90 day period
- 5. Disposition of request posted to www.hipaa-dsmo.org











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

Web Site Information

- ✓ HIPAA Change Request System

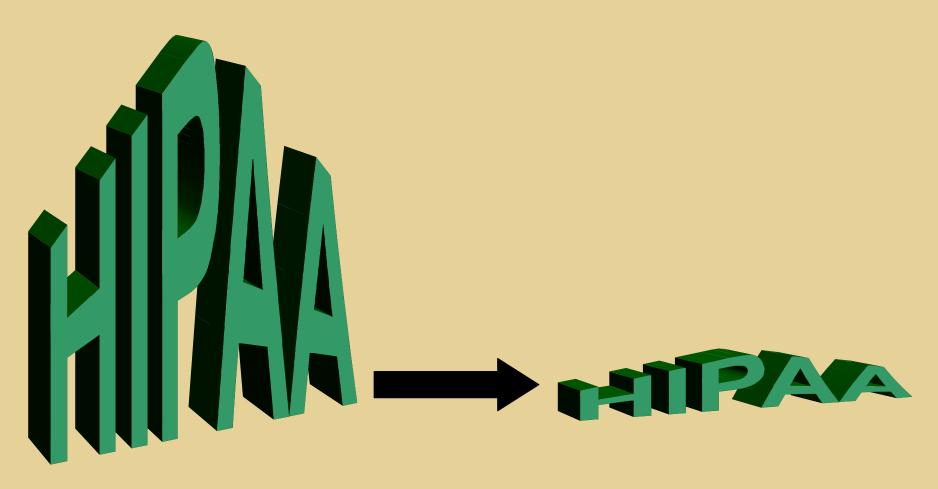
 http://crs.hipaa.org

 ✓ Accredited Standards Committee X12
- http://www.x12.org
- ✓ Dental Content Committee of the ADA
- ✓ Health Level 7 http://www.hl7.org
- ✓ National Council for Prescription Drug Programs
- http://www.ncpdp.org

 ✓ National Uniform Billing Committee
 http://www.nubc.org

 ✓ National Uniform Claim Committee
- http://www.nucc.org
 ✓ US Department of Health and Human Services http://aspe.hhs.gov/admnsimp
- ✓ National Committee on Vital and Health Statistics http://ncvhs.hhs.gov

The DSMO's...helping to make HIPAA more manageable



Maria Ward PriceWaterhouseCoopers, LLP 312.298.2586 Maria.t.ward@us.pwcglobal.com



www.pwcglobal.com/healthcare