



# HIPAA Summit Audioconference

## Analysis of Addenda to HIPAA Transactions and Code Sets Rule

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# Transaction Addenda guides

- X12N Version 4010A1 Implementation Guides
  - Work started October 2000
  - First drafts completed June 2001
  - NPRM published May 31, 2002
  - Small changes in response to NPRM comments
    - NDC, Taxonomy, anesthesia, etc.
  - Published November 7, 2002
- Final Rule published February 20, 2003
  - Adopts 4010A1 as standard versions for 10/16/03 compliance

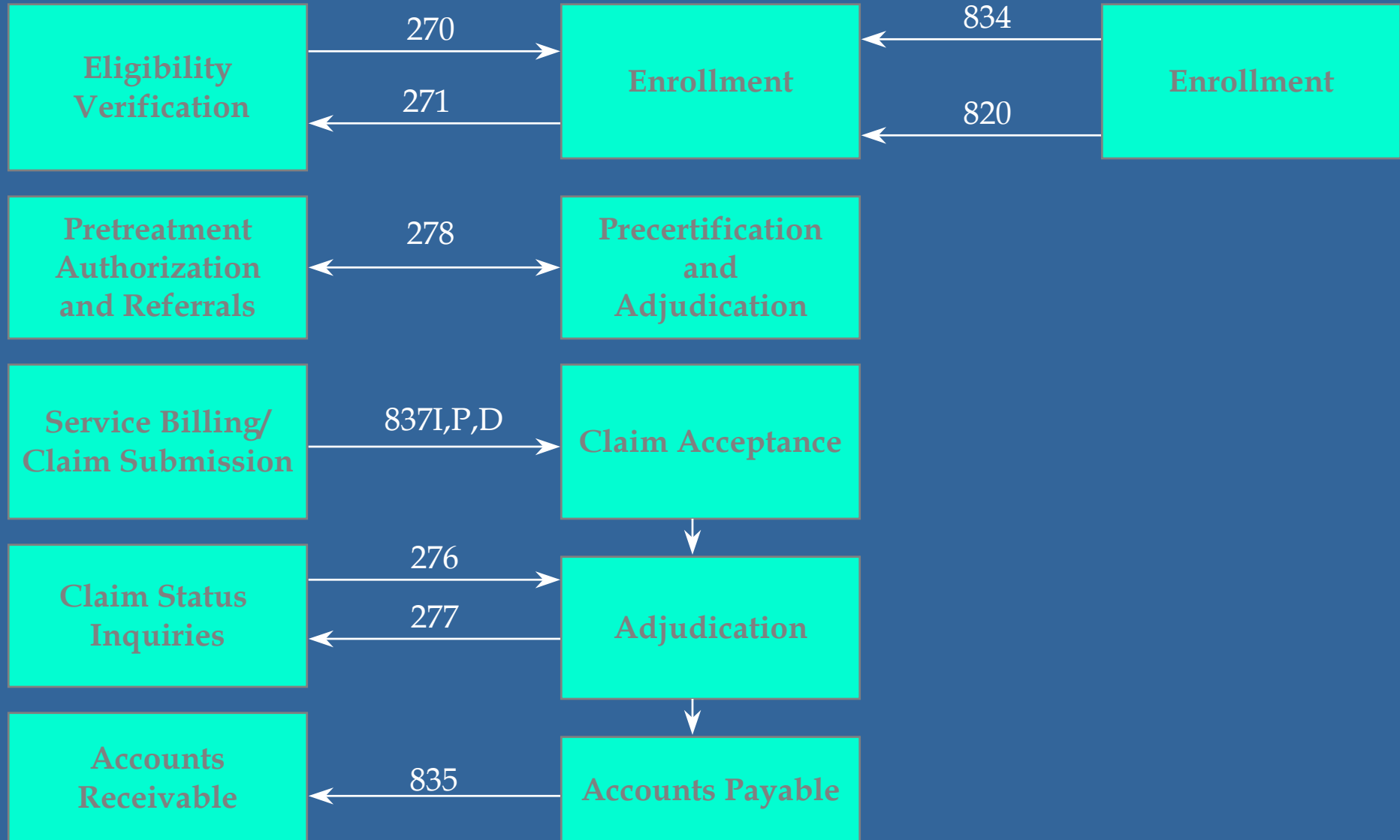
# Transaction schedule

- X12N Implementation Guides for HIPAA
  - May 2000
    - Current version mandated for 10/16/02
    - Expected to be obsolete on 10/16/03
  - Addenda A1
    - Published November 2002
    - Final Rule released in February 2003
    - Implementation required by 10/16/03
    - Mandated modification of the May 2000 version

## PROVIDERS

## INSURANCE AND PAYERS

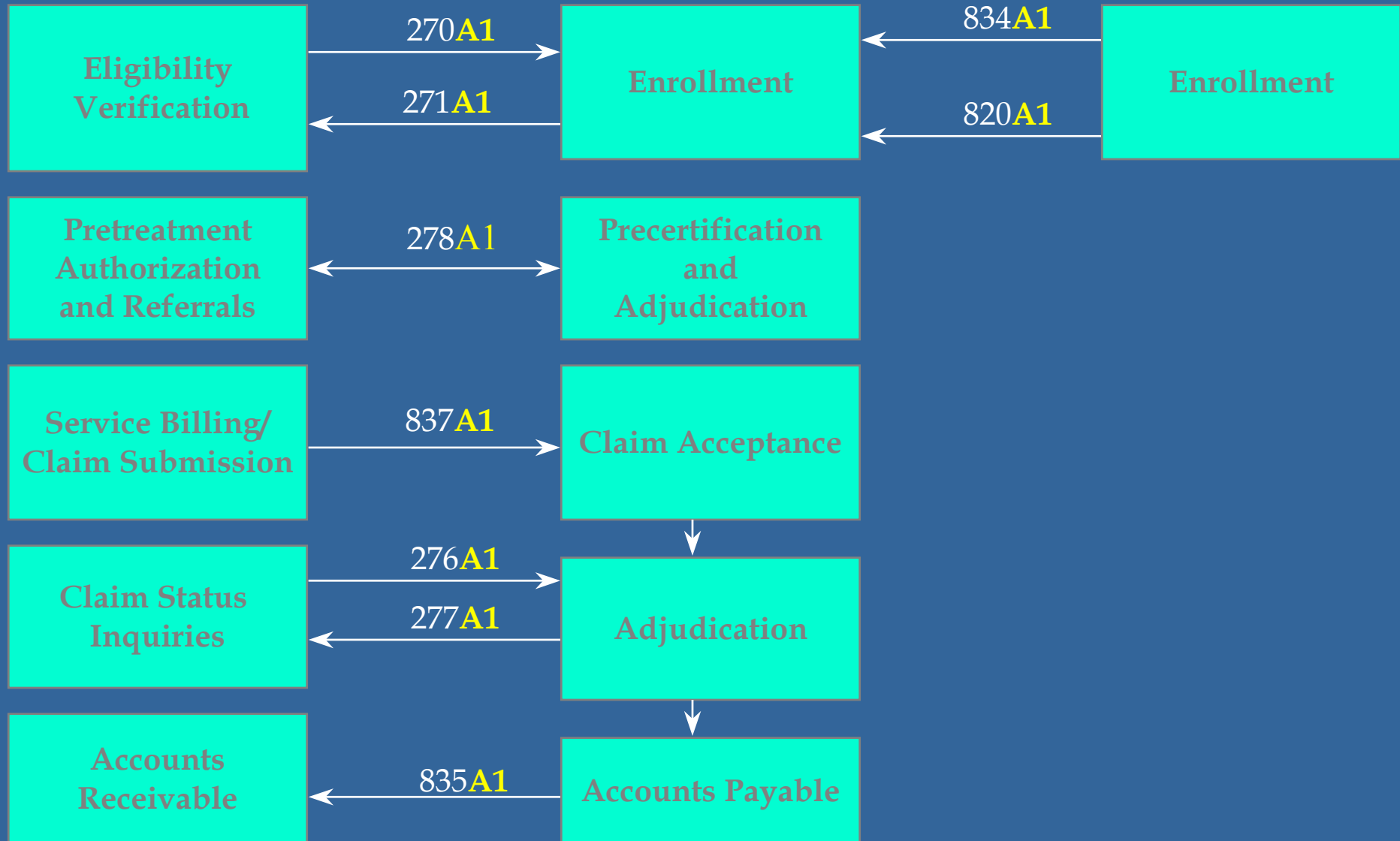
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# Why?

- The May 2000 versions of the guides have severe flaws.
  - Addenda changes only the most critical errors “required for implementation”
  - Most significant changes are to the 837’s and the 278
- Other errors and omissions will be corrected in version 4050

# Future of transactions

- Version 4050 guides in development
  - Out for public comment in March 2003
  - Informational Forums in June during X12 (Nashville, TN)
  - Expected approval in June 2003
    - Will they be adopted under HIPAA?

# New transactions in 4050

- Available for voluntary use (not mandated at this time)
  - Claim Acknowledgement 277
  - Coordination of benefits 269
  - IG Error Reporting 824
  - Eligibility Roster 271
  - Claims Attachments 275
  - Referral Attachments 275
  - Prescriptions (NCPDP Script)

# X12N Version 4050 Guides

- New functionality being added to transactions
  - Guide (275) for attachments to a 278 referral request
  - Guide (824) for standardized acknowledgments approved
  - Changes to claims attachments (275/HL7) solution
- Other versions will follow
- Working with HHS and WEDI to improve/expedite regulatory process

# Implementation Guide Interpretations

- Ambiguous situational language
  - Companion Documents necessary
- Interpretive issues minimal
  - Education a more significant factor
- X12N IG Interpretation Work Group
  - CMS has requested help from X12 on IG interpretation questions
  - Single site to post questions
  - Central place to obtain answers
  - Expected in place by June 2003

# Testing the Addenda Versions

- Must test Addenda version
  - Requirement differences from May 2000 version
  - Especially 837's and 278
- Is testing of vendor, billing service, or clearinghouse enough?
  - Specific business process differences
    - Examples: Referring Dr., Secondary payer, Patient relationship to Subscriber
  - Entire process must be tested:
    - Data collection
      - Data formatting
        - Reformatting (if applicable)
        - Trading partner acceptance

# HIPAA Transaction Testing

- Finite period of time to HIPAA deadline
  - Testing must start by April 16, 2003
- Limited resources (internal & external)
- Expected testing bubble in late 2003
- Testing and production have conflicting requirements
  - Testing: detect and reject errors proactively
  - Production: accept maximum number of claims. Keep low rejection levels.

# Compliant, or not Compliant?

- What is compliance?
- What is a “transaction”?
- Contingency Planning
  - New Formats
  - New **Business Process**
    - New data elements
    - New data requirements (situational)
  - Big switch, or progressive steps?
    - HIPAA compliance or continued business?
  - WEDI White Paper being drafted