

CAQH CORE Payment & Remittance (835)
Infrastructure Rule
Version PR.2.0
April 2022

Revision History For CAQH CORE Payment & Remittance (835) Infrastructure Rule

Version	Revision	Description	Date
3.0.0	Major	Phase III CAQH CORE 350 Health Care Claim Payment/Advice (835) Infrastructure Rule balloted and approved via CAQH CORE Voting Process.	June 2012
PR.1.0	Minor	 Non-substantive adjustments to support re-organization of operating rules into rule sets organized by business transaction (e.g., Eligibility & Benefits, Claim Status, etc.) rather than phase (e.g., Phase I, II, etc.) as approved by the CAQH CORE Board in 2019. Operating rule naming, versioning and numbering methodologies updated to align with business transaction-based rule sets. 	May 2020
PR.2.0	Major	 Update Connectivity reference to align with the most recent published and CAQH CORE adopted version of the CAQH CORE Connectivity Rule. Additional non-substantive adjustments for clarity. 	April 2022

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1. Background Summary

The CAQH CORE Payment & Remittance Operating Rule Set addresses a range of operating rule requirements for both the HIPAA-adopted X12 005010X221A1 Health Care Claim Payment/Advice (835) Technical Report Type 3 Implementation Guide and associated errata (hereafter X12 v5010 835) transaction, also known as the Electronic Remittance Advice (ERA), and the Electronic Funds Transfer (EFT) by addressing operating rules related to the NACHA ACH CCD plus Addenda Record (hereafter CCD+) and the X12 835 TR3 TRN Segment (hereafter the CCD+ and X12 835 TR3 TRN Segment together are the Healthcare EFT Standards¹).

The CAQH CORE Payment & Remittance Infrastructure Rule allows the industry to leverage its investment in the CAQH CORE Eligibility & Benefits and Claim Status Infrastructure Rules and apply it to conducting the HIPAA-adopted X12 005010X221A1 Health Care Claim Payment/Advice (835) transaction (hereafter referenced as X12 v5010 835). Benefits to the industry in applying these CAQH CORE infrastructure requirements to the health care claim payment/advice transaction provide for:

- Less staff time spent on phone calls and websites
- Increased ability to conduct targeted follow-up
- More accurate and efficient processing of claim payments

This CAQH CORE Payment & Remittance (835) Infrastructure Rule for the X12 v5010 835 facilitates industry momentum to increase access to the HIPAA-adopted administrative transactions, and encourages entities to apply the infrastructure they have for eligibility and claim status to the health care claim payment/advice.

1.1. Affordable Care Act Mandates

This rule is part of a set of rules that addresses a request from the National Committee on Vital and Health Statistics (NCVHS) for fully vetted CAQH CORE Operating Rules for the EFT and ERA transactions; the NCVHS request was made in response to NCVHS' role in Section 1104 of the Affordable Care Act (ACA).

Section 1104 of the ACA contains an industry mandate for the use of operating rules to support implementation of the HIPAA standards. Using successful, yet voluntary, national industry efforts as a guide, Section 1104 defines operating rules as a tool that will build upon existing health care transaction standards. The legislation outlines three sets of health care industry operating rules to be approved by the Department of Health and Human Services (HHS) and then implemented by the industry; the second set of which are those for EFT and ERA.² The ACA required HHS to adopt a set of operating rules for both of these transactions by July 2012. In a letter dated 03/23/11,³ NCVHS recommended that the Secretary "name CAQH CORE in collaboration with NACHA – The Electronic Payments Association as the candidate authoring entity for operating rules for all health care EFT and ERA transactions..."

Section 1104 of the ACA also added the EFT transaction to the list of electronic health care transactions for which the HHS Secretary must adopt a standard under HIPAA. The section required the EFT transaction standard be adopted by 01/01/12, in a manner ensuring that it is effective by 01/01/14.

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¹ The CCD+ and X12 835 TR3 TRN Segment are adopted together as the Federal Healthcare EFT Standards in <u>CMS-0024-IFC</u>: Administrative Simplification: Adoption of Standards for Health Care Electronic Funds Transfers (EFTs) and Remittance Advice, 01/10/12.

² The first set of operating rules under ACA Section 1104 applies to eligibility and claim status transactions with an adoption date of 07/01/11 and effective date of 01/01/13; the third set of operating rules applies to health care claims or equivalent encounter information transactions, enrollment and disenrollment in a health plan, health plan premium payments and referral, certification and authorization with an adoption date of 07/01/14 and effective date of 01/01/16.

³ NCVHS <u>Letter to the Secretary</u> - Affordable Care Act (ACA), Administrative Simplification: Recommendation for entity to submit proposed operating rules to support the Standards for Health Care Electronic Funds Transfers and Health Care Payment and Remittance Advice 03/23/11.

In January 2012, HHS issued an Interim Final Rule with Comment (IFC)⁴ adopting the NACHA ACH CCD plus Addenda Record (hereafter CCD+) and the X12 835 TR3 TRN Segment⁵ as the Healthcare EFT Standards. These standards must be used for electronic claims payment initiation by all health plans that conduct healthcare EFT.

NOTE: As of April 2022, HHS had not adopted a standard for health claims attachments and an effective date for these operating rules is not included in the ACA.

2. Issue to Be Addressed and Business Requirement Justification

In order to electronically process a health care claim payment/advice, health plans and providers need to have a detailed health care claim payment/advice. This health care claim payment/advice includes health plans providing information regarding the payment of a claim and detailed information about why the total charges originally submitted on a claim have not been paid in full, information about denied claims, or that the claim is suspended and additional information is being requested, and the method and mode of payment (check, EFT). HIPAA provides a foundation for the electronic exchange of claim payment information, but does not ensure that today's paper-based system can be replaced by an electronic, interoperable system. HIPAA's mandated scope does not:

- Specify how the X12 transactions are to be communicated
- Require the use of any of the X12 standard acknowledgements
- Specify a common companion guide for the flow and format of such guides
- Address the need for providers to be able to conduct a parallel X12 v5010 835 implementation
 process whereby the health plan will continue to deliver its proprietary claim payment remittance
 advices while the provider assures itself that the X12 v5010 835 can successfully replace the
 proprietary remittance advices

Using the available but non-mandated X12 standard acknowledgements, the sender of X12 EDI interchanges will benefit from knowing that the receiving party has successfully received the transactions or has encountered errors that need to be reconciled, especially when sending remittance advice transactions. Requiring health plans that issue companion guides describing their implementation of the X12 v5010 835 Health Care Claim Payment/Advice transaction to use a common flow and format for them will enable providers to more efficiently and effectively configure their accounting systems to automatically process the health care claim payment/advice transaction successfully.

In the CAQH CORE Eligibility & Benefits (270/271) Infrastructure Rule, several "infrastructure" requirements were approved that are designed to bring consistency and to improve the timely flow of the eligibility transactions. These infrastructure requirements include:

- Real Time exchange of eligibility transactions within 20 seconds or less
- The consistent use of the X12 standard X12 005010X231A1 Implementation Acknowledgement for Health Care Insurance (999) (hereafter X12 v5010 999) for both Real Time and Batch exchanges
- 90 percent system availability of a health plan's eligibility processing system components over a calendar week
- Use of the public internet for connectivity
- Use of a best practices companion guide template for format and flow of companion guides for entities that issue them

In the CAQH CORE Claim Status (276/277) Infrastructure Rule, these infrastructure requirements were applied to the exchange of the HIPAA-adopted X12 005010X212 Health Care Claim Status Request and

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⁴ CMS-0024-IFC: Administrative Simplification: Adoption of Standards for Health Care Electronic Funds Transfers (EFTs) and Remittance Advice, 01/10/12.

⁵ The IFC requires health plans to input the X12 835 TR3 TRN Segment into the Addenda Record of the CCD+; specifically, the X12 835 TR3 TRN Segment must be placed in Field 3 of the Addenda Entry Record ("7 Record") of a CCD+.

Response (276/277) Technical Report Type 3 (TR3) implementation guide and associated errata (hereafter X12 v5010 276, X12 v5010 277 or X12 v5010 276/X12 v5010 277) Transaction Sets.

During development of the CAQH CORE Payment & Remittance Operating Rules, the Rules Work Group used discussion, research and straw poll results to determine which infrastructure requirements should be applied to the exchange of the X12 v5010 835. Listed below is an overview of the infrastructure requirements incorporated into this rule in §3 and §4.1.

EFT & ERA Rules Work Group Infrastructure Rules for the X12 v5010 835 Transaction			
CAQH CORE Infrastructure Rule Description	Apply to CAQH CORE Payment & Remittance (835) Infrastructure Rule for the X12 v5010 835 Health Care Claim Payment/Advice		
Connectivity (CAQH CORE Connectivity Rule)	Υ		
Real Time Response Time	N		
Batch Response Time	N		
System Availability	N		
Companion Guide	Υ		
Real Time Implementation Guide (TR3) Acknowledgement (999)	N		
Batch Implementation Guide (TR3) Acknowledgement (999)	Υ		
Normalize Patient Last Name Rule	N		
AAA Error Code Reporting Rule	N		
Dual Delivery of the X12 v5010 835 and Proprietary Paper Remittance Advices	Υ		

This CAQH CORE Payment & Remittance (835) Infrastructure Rule defines the specific business information requirements that health plans must satisfy and which vendors, clearinghouses and providers should use. As with all CAQH CORE Operating Rules, these requirements are intended as a base or minimum set of requirements, and it is expected that many entities will go beyond requirements as they work towards the goal of administrative interoperability. This CAQH CORE Payment & Remittance (835) Infrastructure Rule requires that health plans make appropriate use of the standard acknowledgements, support the CAQH CORE "safe harbor" connectivity requirement, use the CAQH CORE Master Companion Guide Template when publishing their X12 v5010 835 companion guide, and continue to provide dual delivery of their proprietary paper claim remittance advices along with the X12 v5010 835 for a period of time during which providers can ensure that their financial system can successfully use the X12 v5010 835 to post payments.

By requiring the delivery and use of these CAQH CORE infrastructure requirements when conducting the X12 v5010 835, the CAQH CORE Payment & Remittance (835) Infrastructure Rule helps provide the information that is necessary to electronically process a claim payment and corresponding remittance details and thus reduce the current cost of today's paper-based transaction process.

3. Scope

3.1. What the Rule Applies To

This rule aligns with other CAQH CORE Infrastructure Rules for the conduct of the X12 v5010 835. This rule specifies that a health plan or other entity must continue to deliver their proprietary paper claim remittance advices during a parallel implementation testing time period, and use the X12 standard acknowledgments and support the CAQH CORE connectivity safe harbor requirements.

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3.2. When the Rule Applies

This rule applies when any entity uses, conducts or processes the X12 v5010 835.

3.3. What the Rule Does Not Require

This rule does not address any data content requirements of the X12 v5010 835. This rule does not require any entity to:

- Conduct, use or process the X12 v5010 835 Health Care Claim Payment/Advice transaction if it currently does not do so or is not required by Federal or state regulation to do so
- Build Real Time claim adjudication capabilities; entities only need to test for and meet Batch rule requirements for health care claim payment/advice transactions

3.4. Outside the Scope of This Rule

This rule does not address the data content of the X12 v5010 835.

3.5. How the Rule Relates to other Operating Rule Sets

This rule aligns with other CAQH CORE Infrastructure Rule requirements by specifying the use of the X12 005010X231A1 Implementation Acknowledgement for Health Care Insurance (999) when conducting the X12 v5010 835.

As with other CAQH CORE Operating Rules, general CAQH CORE policies also apply to CAQH CORE Payment & Remittance Operating Rules.

This rule supports the CAQH CORE Guiding Principles that CAQH CORE Operating Rules will not be based on the least common denominator but rather will encourage feasible progress, and that CAQH CORE Operating Rules are a floor and not a ceiling, e.g., entities can go beyond the CAQH CORE Payment & Remittance Operating Rules.

3.6. Assumptions

A goal of this rule is to adhere to the principles of EDI in assuring that transactions sent are accurately received and to facilitate correction of errors for electronically submitted health care claims.

The following assumptions apply to this rule:

- A successful communication connection has been established
- This rule is a component of the larger set of CAQH CORE Payment & Remittance Operating Rules; as such, all of the CAQH CORE Guiding Principles apply to this rule and all other rules
- This rule is not a comprehensive companion document addressing any content requirements of the v5010 835X12 v5010 835

4. Rule Requirements

4.1. Health Care Claim Payment/Advice Connectivity Requirements

The CAQH CORE Conectivity Rule requirement addresses usage patterns for Batch transactions, the exchange of security identifiers, and communications-level errors and acknowledgements. It does not attempt to define the specific content of the message exchanges beyond declaring that the HIPAA-mandated X12 formats must be used between covered entities, and security information must be sent outside of the X12 payload.

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The CAQH CORE Connectivity Rule is designed to provide a "safe harbor" that application vendors, providers and health plans (or their agents⁶) can be assured will be supported by any trading partner. All organizations must demonstrate the ability to implement connectivity as described in the most recent published and CAQH CORE adopted version of the CAQH CORE Connectivity Rule (hereafter referred to as CAQH CORE Connectivity Rule). These requirements are not intended to require trading partners to remove existing connections that do not match the rule, nor is it intended to require that all trading partners must use this method for all new connections. CAQH CORE expects that in some technical circumstances, trading partners may agree to use different communication mechanism(s) and/or security requirements than that described by these requirements.

The requirement to support the CAQH CORE Connectivity Rule does not apply to retail pharmacy. For retail pharmacy the entity should refer to the National Council for Prescription Drug Programs (NCPDP) at www.ncpdp.org. NCPDP and CAQH CORE support a shared goal of continued alignment for connectivity across retail pharmacy and medical.

4.2. Health Care Claim Payment/Advice Batch Acknowledgement Requirements

These requirements for use of acknowledgements for Batch Mode places parallel responsibilities on both receivers of the X12 v5010 835 and senders of the X12 v5010 835 for sending and accepting X12 v5010 999 acknowledgements. The goal of this approach is to adhere to the principles of EDI in assuring that transactions sent are accurately received and to facilitate health plan correction of errors in their outbound transactions.

The rule assumes a successful communication connection has been established.

4.2.1. Use of the X12 999 Implementation Acknowledgement for Functional Group Acknowledgement

A receiver of an X12 v5010 835 transaction must return:

 An X12 v5010 999 Implementation Acknowledgement for each Functional Group of X12 v5010 835 transactions to indicate that the Functional Group was either accepted, accepted with errors or rejected

And

 To specify for each included X12 v5010 835 Transaction Set that the Transaction Set was either accepted, accepted with errors or rejected.

A health plan must be able to accept and process an X12 v5010 999 for a Functional Group of X12 v5010 835 transactions.

When a Functional Group of X12 v5010 835 transactions is either accepted with errors or rejected, the X12 v5010 999 Implementation Acknowledgement must report each error detected to the most specific level of detail supported by the X12 v5010 999 Implementation Acknowledgement.

The requirements specified in this section do not currently apply to retail pharmacy.

4.3. Dual Delivery of X12 v5010 835 and Proprietary Paper Claim Remittance Advices

A health plan that currently issues proprietary paper claim remittance advices is required to continue to offer such paper remittance advices to each provider during that provider's initial implementation testing of the X12 v5010 835 for a minimum of 31 calendar days from the initiation of implementation. If the 31 calendar day period does not encompass a minimum of three payments to the provider by the health

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⁶ One who agrees and is authorized to act on behalf of another, a principal, to legally bind an individual in particular business transactions with third parties pursuant to an agency relationship. Source: West's Encyclopedia of American Law, edition 2. Copyright 2008 The Gale Group, Inc. All rights reserved.

plan, the health plan is required to offer to continue to issue proprietary paper claim remittance advices for a minimum of three payments.

At the conclusion of this time period, delivery of the proprietary paper claim remittance advices will be discontinued. At the provider's discretion, the provider may elect to not receive the proprietary paper claim remittance advices, to choose a shorter time period, or to discontinue receiving the proprietary paper claim remittance advices before the end of the specified timeframe by notifying the health plan of this decision.

Upon mutual agreement between the provider and the health plan, the timeframe for delivery of the proprietary paper claim remittance advices may be extended by an agreed-to timeframe, at which time the health plan will discontinue delivery of the proprietary paper claim remittance advices.

If the provider determines it is unable to satisfactorily implement and process the health plan's electronic X12 v5010 835 following the end of the initial dual delivery timeframe and/or after an agreed-to extension, both the provider and health plan may mutually agree to continue delivery of the proprietary paper claim remittance advices.⁷

The requirements specified in this section do not currently apply to retail pharmacy.

4.4. Health Care Claim Payment/Advice Companion Guide

Health plans or their agents have the option of creating a "companion guide" that describes the specifics of how they will implement the HIPAA transactions. The companion guide is in addition to and supplements the X12 TR3 implementation guide.

Historically, health plans or their agents have independently created companion guides that vary in format and structure. Such variance can be confusing to trading partners/providers who must review numerous companion guides along with the X12 TR3 implementation guides. To address this issue, CAQH CORE developed the CAQH CORE Master Companion Guide Template for health plans or their agents. Using this template, health plans or their agents can ensure that the structure of their companion guide is similar to other health plans' documents, making it easier for providers to find information quickly as they consult each health plan's document on these important industry EDI transactions.

Developed with input from multiple health plans, system vendors, provider representatives and health care/ HIPAA industry experts, this template organizes information into several simple sections – General Information (Sections 1-9) and Transaction-Specific Information (Section 10) – accompanied by an appendix. Note that the companion guide template is presented in the form of an example of a fictitious Acme Health Plan viewpoint.

Although CAQH CORE Participants believe that a standard template/common structure is desirable, they recognize that different health plans may have different requirements. The CAQH CORE Master Companion Guide template gives health plans the flexibility to tailor the document to meet their particular needs.

The requirements specified in this section do not currently apply to retail pharmacy.

4.5. Health Care Claim Payment/Advice Companion Guide Requirements

An entity's Companion Guides covering the X12 v5010 835 must follow the format/flow as defined in the CAQH CORE Master Companion Guide Template for HIPAA Transactions. (CAQH CORE Master Companion Guide Template available here.)

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⁷ Subject to Section 1104(d) of the Patient Protection and Affordable Care Act which amends Section 1862(a) of the Social Security Act to state: Sec. 1862. [42 U.S.C. 1395y] (a) Notwithstanding any other provision of this title, no payment may be made under part A or part B for any expenses incurred for items or services— not later than January 1, 2014, for which the payment is other than by electronic funds transfer (EFT) or an electronic remittance in a form as specified by X12 835 Health Care Payment and Remittance Advice or subsequent standard.

NOTE: This rule does not require any entity to modify any other existing companion guides that cover other HIPAA-adopted transaction implementation guides.

5. Conformance Requirements

Separate from any HHS certification/compliance program to demonstrate conformance as mandated under ACA Section 1104, CAQH CORE offers CORE Certification for all published CAQH CORE Operating Rule Sets. CORE Certification is completely optional. Pursuing CORE Certification offers an entity a mechanism to test its ability to exchange EFT and ERA transaction data with its trading partners. A CORE Certification Seal is awarded to an entity or vendor product that completes CORE Certification testing with a CAQH CORE-authorized testing vendor. Key benefits of CORE Certification include:

- Demonstrates to the industry adoption of the CAQH CORE Payment & Remittance Operating Rules via a recognized industry "CORE Certification Seal"
- Encourages trading partners to work together on transaction data content, infrastructure and connectivity needs
- Reduces the work necessary for successful trading partner testing as a result of independent testing of the operating rules implementation
- Promotes maximum ROI when all stakeholders in the information exchange are known to conform to the CAQH CORE Operating Rules

For more information on achieving CORE Certification for the CAQH CORE Payment & Remittance Operating Rules, refer to the Payment & Remittance CAQH CORE Certification Test Suite or contact CORE@caqh.org.

6. Appendix

6.1. Appendix 1: Reference

- X12 005010X231A1 Implementation Acknowledgement for Health Care Insurance (999) Technical Report Type 3
- X12 005010X221A1 Health Care Claim Payment/Advice (835) Professional Technical Report Type 3 and associated errata

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