Future of Health Care Data Reporting

Data Oversight Council Meeting

May 18, 2004

South Carolina Mandated Reporting

- Regulations require the use of the uniform billing format for reporting data from hospitals

- Regulations require the use of the ORS defined format for reporting for home health, ambulatory surgery and other services/equipment requiring a certificate of need

What's on the horizon for Healthcare Reporting

- Uniform Bill 2004

- International Classification of Diseases, 10th Edition (ICD-10)

- Health Care Service: Data Reporting Guide – an ANSI ASC X12 approved HIPAA compatible implementation guide ready for state use today to report discharge data.

Data Content – UB Issues

- UB-92
  - National & Local form locators
  - National & Local code ranges
  - **UB-92 data specs is the principal content used in the HIPAA Electronic Format (837)**

- UB-04
  - All form locators national
  - All code ranges reserved for national assignment
  - UB data to be designated for use in **claims** and/or **reporting**
  - **UB-04 data specs will be the principal content used in HIPAA Electronic Format (837)**

Proposed Changes in UB-04

- Support for ICD-10-CM & ICD-10-PCS (7 characters for each allocated)
- Present On Admission Diagnosis Indicators would now supported
- Additional external cause of injury codes would now supported
- Patient Marital Status to be removed from UB specifications, unless it is needed for reporting
- Do Not Resuscitate Indicator Will Be Added

Proposed Changes in UB-04

- Data element for the state where an accident happened being added
- Record length of Patient's Medical Record being extended from 17 characters to 20 characters
- New Code-Code-Value fields
  - Would support Race & Ethnicity reporting
  - Would support reporting more clinical data

Proposed Changes in UB-04

- National Uniform Billing Committee (NUBC) – responsible for all changes in institutional data content

- South Carolina Uniform Billing Committee – historically major role in UB-82, UB-92 and now UB-04, represents SC and implements changes

- Effort being made to align UB-04 data specifications with HIPAA Transactions & Code Sets

- Expected UB-04 Approval Date: 2004

- Expected UB-04 Implementation Date: 2006

ICD-10 CM Coding Implementation

- Addition of information relevant to ambulatory & managed care encounters; Expanded injury codes; The creation of combination diagnosis/symptom codes to reduce the number of codes needed to fully describe a condition.

- Require changes to all software used by healthcare industry

- Trending for major disease categories Implementation date: To Be Announced

- Implementation Mechanism: HIPAA Transaction & Codes Sets

HIPAA Transaction Standards Overview and Discussion

- Data formats – X12 Stuff
- Data Content – NUBC Stuff

Remember: "**United we stand divided we fall**"

Title I Portability	Title II Administrative Simplification	Titles III, IV and V

Transaction Standards

Data Elements

- Required vs. Situational
- Format
- Non-Medical Codes

Transaction Sets

- ASC X12N version 4010 mandated
- Claims (I, P, D) - 837
- Eligibility Inquiry/Response— 270/271
- Referral Certification and Authorization Req/Resp—278
- Claim Status Request Response—276/277
- Benefit Enrollment and Maintenance—834
- Claim Payment and Remittance Advice—835
- Premium Payments—820
- Additional Information to support claims/Encounters (not yet final) - 148
- First Report of Injury (not yet final) - 148
- NCPDP 5.1 mandated for pharmacy transactions (claims, eligibility, and payment/remittance)

Standard Code Sets

Medical and Non-Medical Codes

- ICD-9-CM
- CPT-4
- HCPCS
- CDT
- NDC
- No Local Codes
- Likely Return of "J" Codes

Unique Health Identifiers

Provider

- Single NPI: 10 position numeric, one digit checksum (no location code)
- No embedded Intelligence

Employer

- 9 position numeric
- Tax ID Number
- No embedded Intelligence

Health Plan (no NPRM issued)

- 10 position numeric, one digit checksum
- Definition of health plan unclear
- No embedded Intelligence

Individual

- On hold (unlikely to be finalized)

Security

Administrative Procedure

- Chain of Trust Agreement
- Certification, Internal Audit, Training, Policies, BCP, etc

Physical Safeguards

- Secure Workstation
- Physical Access Controls for Network/Computer H/W etc.
- Facilities, Media Disposal, etc.

Technical Security Services

- Access Controls
- Authorization
- Data Authentication
- Entity Authentication

Technical Security Mechanisms

- Basic Network Safeguards
- Integrity and Protection

Electronic Signature

- Not required for any current HIPAA—mandated transaction

Privacy

Applicability

- Covers protected health information (PHI) stored or transmitted in any form or medium: electronic, paper and oral

Key Elements

- PHI data elements defined
- Notice of privacy practices mandated
- Minimum necessary disclosure/use
- Consent required for routine use—May Change!
- Authorization required for non-routine use
- Business associate contracts required
- Designated Privacy Officer

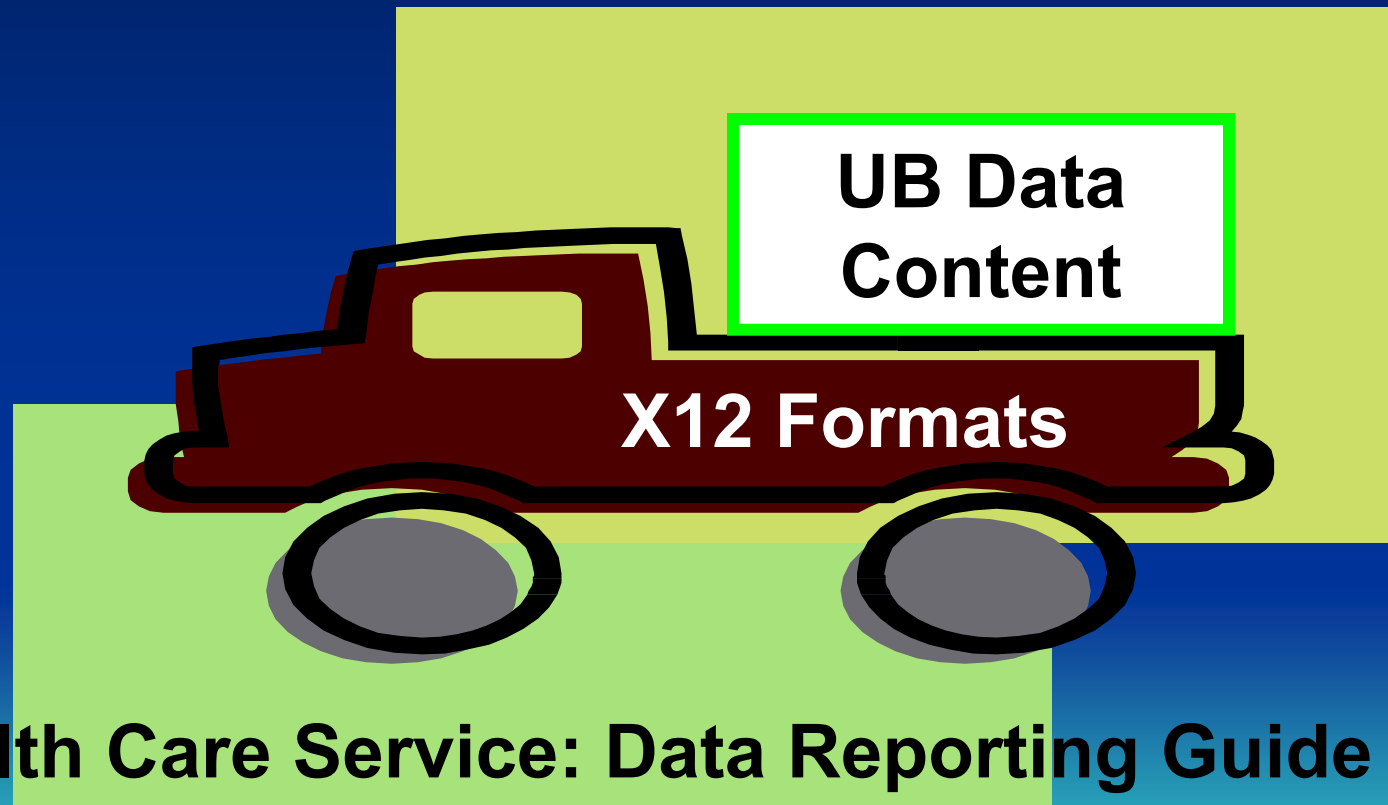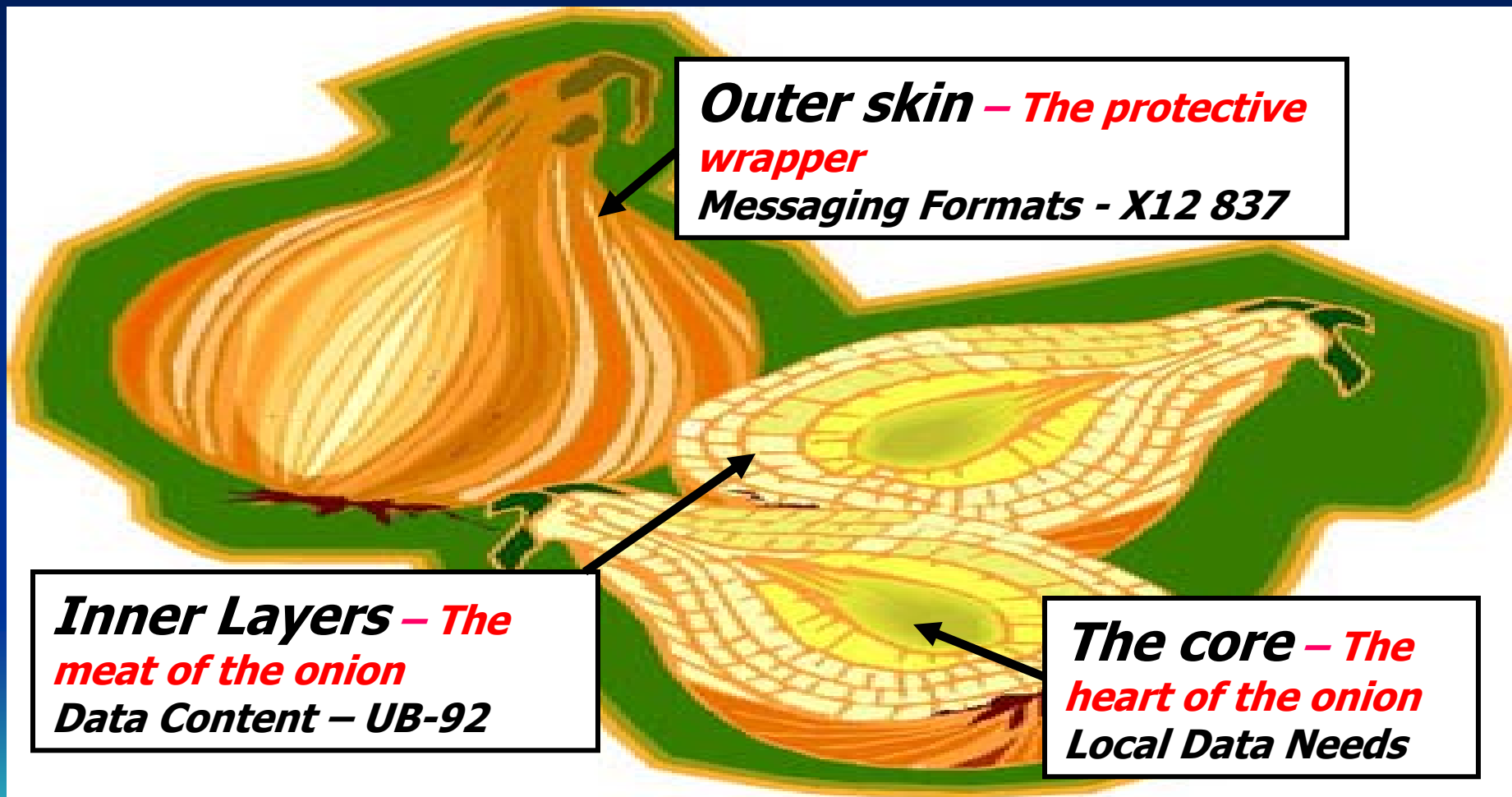| 2002	2003			2004	2005	2006	2007	2008
December 1, 2002 through January 14, 2003: **Build Your Transactions** Install and activate any "wrap/map" or new functionality for electronic communication with submitters (e.g., transient data store, electronic interfaces from membership system(s) to verify and determine the extent of a member's insurance eligibility). Contact a third-party certification or testing service to start in-house testing of HIPAA transactions utilizing SNIP Levels 1-7. Upgrade any affected interfaces and test them in your systems' test environment.	January 15 through April 14, 2003 **Test Your Transactions Internally** Formulate a plan for switching your interfaces to your live environment and aggressively monitor your financial performance. Complete internal (i.e., non-submitter connected) testing. Contact providers and clearinghouses and request that you start testing with them as soon as possible to get meaningful assistance and give you time to complete all testing.	April 15 through October 15, 2003 **Test Your Transactions Externally** Complete testing and/ir certification with each provider, clearinghouse, and other third-party associate. **Migrate Your Transactions** Switch over to HIPAA-compliant transactions as soon as possible to avoid last-minute problems. Aggressively monitor the imact of the HIPAA implementation fo your financial performance.	April 14, 2003 Privacy Rules and Transaction and Codes Rules Compliance Date for small health plans NOT applying for an Administrative Simplification Compliance Act (ASCA) extension.	2004 Claims Attachment Rules Due in 2004 April 14, 2004 Privacy Rules Compliance Date for small health plans.	April 21, 2005 Security Rules Compliance Date for covered entities (Small Health Plans April 21, 2006) May 23, 2005 Identifier Rules: National Provider ID Compliance Date for application of NPI's	April 21, 2006 Security Rules Compliance Date for Small Health Plans.	May 23, 2007 Identifier Rules: National Provider ID Compliance Date for use in transactions (2008 for small health plans)	May 23, 2008 Identifier Rules: National Provider ID Compliance Date for use in transaction for small health plans.

Overview of Provisions

- HHS adopted national standards for electronic administrative and financial health care transactions – October 2003
- Adopt ANSI standards as vehicle for implementation electronic format for transactions
- Standards Development Organizations (SDO) developing messaging standards (**Data Format**)
  - X12, HL7, NCPDP
- Consultations required with National Organizations regulating healthcare reporting standards – (**Data Content**)
  - WEDI, NUBC, NUCC, ADA, NCVHS,

Enabling Standards For State Reporting

UB Data Content

X12 Formats

Health Care Service: Data Reporting Guide

? Where do MY data needs fit into National Standards

ANS. Peel the Onion

Outer skin *– The protective wrapper*
Messaging Formats - X12 837

Inner Layers *– The meat of the onion*
Data Content – UB-92

The core *– The heart of the onion*
Local Data Needs

Standards Discussion

- How do these national treads effect the mission and mandates of the Data Oversight Council?

Future Road to Travel
"This journey is a **MARCH** not a **LEAP**"

- Changes in regulations for submission of data to comply with UB-04

- Secure connectivity to enable electronic reporting

- Evaluation of electronic formats currently being used to collect data

- Evaluation of data elements currently being collected

- Availability of an implementation guide for electronic reporting of health care services – Health Care Service Data Reporting Guide

- **End Goal full adoption of National Standards**