

5010 Status

December 2011

HIPAA 5010 CMS Updates

- **CMS recently released a communication which outlined a “contingency” window for 5010 compliance.**

“Today the Centers for Medicare & Medicaid Services’ Office of E-Health Standards and Services (OESS) announced that it would not initiate enforcement action until March 31, 2012, with respect to any HIPAA covered entity that is not in compliance with the ASC X12 Version 5010 (Version 5010), NCPDP Telecom D.0 (NCPDP D.0) and NCPDP Medicaid Subrogation 3.0 (NCPDP 3.0) standards. Notwithstanding OESS’ discretionary application of its enforcement authority, the compliance date for use of these new standards remains January 1, 2012 (small health plans have until January 1, 2013 to comply with NCPDP 3.0).

HIPAA 5010 Timelines & Status

- Continuing to operate per the revised Timeline for both AZ and HI as “acknowledged” by CMS Regional Office; current plan will ensure our “external” compliance with all but 2 required (835 and 278) and 1 optional (NCPDP PAH) transactions by 1/1/2012 and all transactions by 7/1/2012;
- *Note #1 AHCCCS has reevaluated and determined that we will not implement the 277PSI for pended claims at this time.*
- *Note #2 AHCCCS is also evaluating the potential for the development of a reverse map for the 835 transaction by 4/1/2012; which would also allow for our external compliance with this transaction prior to the CMS enforcement date.*

HIPAA 5010 Timelines & Status

- CMS has requested that we ensure that we have a detailed Communication Plan in place for all impacted/interested Trading Partners. This plan has been formalized and is being executed on an ongoing basis.

HIPAA 5010 Timelines & Status cont.

- Key Milestones for 7/1/2012 full compliance:
 - 11/1/2011 – Programming re-started **and Freeze Period began**
 - 1/2012 – Coding completes, start internal testing
 - 3/2012 – Begin UAT (external testing)
 - 6/2012 – Complete UAT
 - 7/1/2012 – Implementation in Production **and Freeze Period ends**

HIPAA 5010 Timelines & Status cont.

- All Contractors (with the exception of outgoing Program Contractors), must implement all 5010 transactions by no later than 1/1/2012, with the exception of those delayed by AHCCCS (835 and 278 transactions), *for which if desired they may make specific arrangements with us to continue on the 4010a for a limited timeframe to extend no later than 7/1/2012.* Contractors may also continue to submit 837 Encounters in a 4010 format to extend no later than 7/1/2012 or may begin to send 5010 formats at any time. Contractors must continue to send current NCPDP Encounter formats until the 7/1/2012 full implementation of NCPDP PAH transaction by AHCCCS.

HIPAA 5010 Timelines & Status cont.

- All other Trading Partners, must implement all 5010 transactions by no later than 1/1/2012 , with the exception of those delayed by AHCCCS (835, 278, and NCPDP PAH) transactions, for which they must continue on current transaction versions/options until the 7/1/2012 implementation (or possible 4/1/2011 implementation for the 835) of these transactions by AHCCCS. AHCCCS will allow Trading Partners on an as requested basis to continue submissions in a 4010 format to facilitate additional testing for a period not to extend beyond 6/30/2012.

HIPAA 5010 Current Timelines & Status, cont.

– Status by Transaction:

- 820 – In production effective 10/1/2010; no 4010 support except outgoing Program Contractors after 1/1/2012.
- 834 – In production effective 10/1/2010 ; no 4010 support except outgoing Program Contractors after 1/1/2012.
- 270/271 - In production effective 10/1/2011 ; no 4010 support after 1/1/2012.
- 276/277 - In production effective 10/1/2011 ; no 4010 support.
- 837P/I/D (Claims and Encounters) – Reverse map in production effective 10/1/2011; full integrated implementation 7/1/2012; no 4010 7/1/2012; support of both 4010 and 5010 versions from now until 6/30/2012.

HIPAA 5010 Current Timelines & Status, cont.

- 835 - Implementation delayed until 7/1/2012; no 4010 after 7/1/2012. *See prior note regarding a possible option for earlier external compliance.*
- NCPDP D.0 – Must be implemented by all contracted PBM's no later than 1/1/2012.
- NCPDP Post Adjudicated History (renamed this week by NCPDP to the Post Adjudication Standard) for claims and encounters - Implementation delayed until 7/1/2012; no 4010 after 7/1/2012.