

**OR DHS**  
**Weekly Trading Partner Communication**  
**11/21/03**

This week DHS would like to share the following information

- **Welcoming Additional DHS Trading Partners To The HIPAA Weekly Message!**
- **834 and 820 Transaction Test File Status**
- **Compliance Action Plan Status**
- **“Good Faith” Efforts and Trading Partner Agreements (from 10/31/03)**
- **Next Week Is Thanksgiving.**

**1. Welcoming Additional DHS Trading Partners To The HIPAA Weekly Message!**

DHS would like to welcome additional Trading Partners to the HIPAA Weekly Message. In an effort to better communicate with all Electronic Data Interchange (EDI) Trading Partners, DHS is in the process of ensuring that all Trading Partners who have signed a Trading Partner Agreement with DHS will receive the HIPAA Weekly Message.

For those of you receiving the HIPAA Weekly Message for the first time, this message from DHS is intended to keep you informed of DHS HIPAA Compliance status so that you can more efficiently plan your own compliance efforts and your interactions with DHS. Each week, you will receive the HIPAA Weekly Message consisting of valuable information regarding testing, upcoming DHS work sessions and other opportunities that will hopefully provide value in your pursuit of HIPAA Compliance.

Whether you are just getting started or are in the process of actively testing with DHS we hope the HIPAA Weekly Message adds value to your efforts. Below is some contact information you may want to keep if you have questions about working with DHS toward HIPAA Compliance.

EDI Testing Team Phone: 503-947-5347

HIPAA Testing and Questions Email: [dhs.hipaatesting@state.or.us](mailto:dhs.hipaatesting@state.or.us).

DHS recognizes there are many challenges facing organizations that are working towards HIPAA Compliance. DHS also understands that HIPAA Compliance cannot be achieved without cooperation and collaboration. We encourage you to forward this email to others that you feel could benefit from the information included and please utilize the contact information listed above for assistance.

**2. 834 and 820 Transaction Test File Status – Prepaid Health Plans (PHP)**

**834 Transaction – Weekly Enrollment**

**820 Transaction – Capitation Payment**

At the November DHS HIPAA Contractors Task Force meeting, there was a discussion regarding the preference of the Managed Care Plans or Plans to receive test files for the 834 and 820. DHS communicated that it was still in the process of working through a number of issues on each file. The Plans communicated that the ideal scenario would be to receive both an 834 and 820 test file for the same period so they could compare information on each and make sure the both Transactions reconciled accurately.

The decision from the meeting was that a crosswalk of data elements in the current Enrollment File would be compared to the new 834 Enrollment Transaction. The crosswalk will be sent to PHPs via email asking for a quick review and feedback. PHPs requested a similar crosswalk for the 820 Transaction. DHS will also be planning a work session to go over both transactions in December.

### **3. “Good Faith” Efforts and Trading Partner Agreements**

DHS is aggressively pursuing HIPAA compliance. Now that the October 16, 2003, compliance date has passed, it is important that we are all working together toward compliance through a collaborative process. As DHS communicated in the September 4<sup>th</sup> and October 13<sup>th</sup>, 2003, letters to providers, the deadline for submitting your trading partner agreement (TPA) was October 15, 2003.

DHS is beginning the process of evaluating who has not submitted a Trading Partner Agreement and will be contacting providers who are not honoring the DHS “Good Faith” effort guidelines. For those that have not submitted a Trading Partner Agreement DHS will ask that they submit a Compliance Action Plan (CAP) to identify their individual compliance plan.

While CMS has implemented its contingency, CMS is closely monitoring compliance. DHS is following the CMS lead and at the suggestion of CMS will be identifying specific requirements that trading partners must follow during the transition to HIPAA compliance. An example of these requirements include the following:

- Establish a specific number of days that a trading partner must begin Third Party Testing on the OR DHS EDIFICS site after signing their TPA.
- Establishing a specific number of days that a trading partner must begin Business to Business (B2B) testing once it has passed the EDIFICS types 1-7 testing; and
- Establishing a specific number of days that a trading partner must transition to production after passing B2B testing.

The purpose of establishing these requirements is to achieve the following objectives:

- Supports the “Good Faith” guidelines of both DHS and CMS;

- Enables DHS to transition trading partners into B2B testing and a production process in a more efficient manner by reducing the likelihood of a scenario where all trading partners are transitioning at one time; and
- Supports an environment of progress where DHS and its trading partners are continually moving closer to HIPAA compliance.

#### 4. DHS HIPAA Compliance Target Dates

DHS is aggressively pursuing HIPAA compliance and it is important that we are all working together toward compliance through a collaborative process.

As part of DHS' efforts to comply with the CMS "Good Faith" policy guidance, we have established a set of new compliance target dates. The new dates are not only appropriate but also necessary to achieve compliance as soon as possible. DHS believes the following dates provide DHS and its trading partners with a realistic opportunity to achieve HIPAA compliance.

<b>Transactions</b>	<b>Compliance Target Date</b>
800 Series Transactions Fee For Service and Prepaid Health Plans 837-P, 837-D, 837-I, 835	April 1, 2004
200 Series Transactions 278,277,276,271,270	October 1, 2004
Complete HIPAA Compliance	January 1, 2005

DHS hopes that these compliance targets enable a large percentage of the Trading Partner community to be HIPAA compliant. For those organizations that are not compliant DHS will work collaboratively with them to create a Compliance Action Plan (CAP) that will identify expected compliance dates as well as potential non-compliance conditions.

If you have questions about how these revised DHS compliance target dates affect you, please call Jarred Clark, DHS HIPAA Project Manager, at (503) 947-5378 or Nancy Buck, OMAP HIPAA Coordinator, at (503) 947-6797.

#### 5. Next Week Is Thanksgiving.

DHS will be closed next Thursday, November 27<sup>th</sup>, 2003 to observe the Thanksgiving Holiday. The next HIPAA Weekly Message will be distributed on December 5<sup>th</sup>, 2003.