UTHealth | School of Public Health
The University of Texas
Health Science Center at Houston

November 18, 2022 Submitter Forum[*]

ATTENDEES	
• Lee Spangler, Executive Director	• Devin York, Senior Project Manager
• Joseph Harrison, Data Process Manager	• Jodie Nassar, Data Operations Manager

AGENDA
• Introductions • Operations Update • Testing/Technical Requirements

DISCUSSION TOPICS – Q&A

General

1. How can I submit a ticket?

*There are two ways to accomplish this. First you may submit a ticket by logging into the TX-APCD submission portal at **txapcd.org** (Help Menu→My Tickets→New Ticket). Additionally, you can send an email to support@tickets.txapcd.org.*

Common Data Layout

2. Can we get a copy of the different quality validation rules and threshold percentages for all the required elements?

Please download a copy of the CDL from https://go.uth.edu/txapcd (see the Technical Guides tab). The CDL contains the threshold percentages for all data elements.

3. How often will the TX-APCD change CDL versions? Once a year, every quarter? How will we be notified other than having to look at the website?

The TX-APCD CDL is adopted as part of the rulemaking process with the Texas Department of Insurance (TDI). Any future CDL updates will need to be routed through TDI's rule process. The CDL will, therefore,

---

[*] Some questions submitted have been edited for clarity.

not be updated every quarter. For future CDL updates, data submitters will be given ample notification of the change (via rule notification) as well as plenty of lead time for testing and cutover.

4. Will there be any additional validation rules above what is in the CDL?

All data validation rules are contained with the CDL. However, the Center will conduct other integrity checks such as missing fields, incorrect formats, file naming conventions, etc.

5. If our policies do not provide dental coverage, would the entire section be populated with the null value as indicated in the Technical Guide, or is there an expectation of values being populated?

If your policies do not include dental coverage then the Center does not expect submission of a dental claim or dental provider file.

Extensions and Exceptions

6. Can a carrier file for extension and exception, or are they mutually exclusive?

Yes, a carrier may file both an extension and an exception, they are not mutually exclusive. An extension permits a required submitter to request additional time for data submission. An extension may last for up to one year, but may be requested or granted for a shorter time period.

An exception is a request for temporary relief from one or more requirements of this subchapter or the TX-APCD CDL. An exception may be granted for up to one year and must be received 30 calendar days before the date the required submitter is required to comply.

7. How can we submit waivers for fields that are not passing validation?

There are two options provided in the rule. The first, an exception form would allow the data submitter to explain why they are unable to comply with the standard. The second, an extension form, would provide the data submitter more time to provide a file that complies with the CDL standard. The extension request does not excuse the data submitter from providing the data. Both requests must be approved by the Center.

8. Can you verify the time period required for extension requests for regular file submissions? Is it 30 days like the exceptions?

According to TDI regulations, a required submitter may submit a "request for an extension to the Center before the reporting due date…" and is otherwise silent on timing, unlike exception requests. However, required submitters should note the Center is permitted at least 14-days to consider an extension request (with additional time should the Center request additional information). The 14-day minimum time-period should be considered when deciding upon the timing for extension requests.

9. **Is it possible to get an exemption from submitting files if you have less than 200 total lives that would qualify?**

There are no exemptions from the requirement to submit data. Eventually a required submitter must be prepared to submit data. However, a small payor with less than 200 lives may request an extension under the regulations. This does not apply to a payor that has more than 10,000 covered lives with multiple small products/policies.

The adopted regulations permit a one-year extension of the submission requirement for payors with less than 10,000 lives. Requestors should note that the one-year extension time period will also increase the time period covered by the historical data set, which are for those claims submitted from January 2019 through October 2022 (or to the submitter's first monthly data submission).

10. **For new plans (market entry in 2023) is an extension or exception required to be filed or will those plans not be subject to submission requirements until 2024?**

Yes, an extension request is necessary.

11. **Will there be waivers/exceptions in place for additional validations above the CDL validations? If so, what is the process for these?**

There are no waivers for the inability to meet the CDL requirements. A temporary exception may be requested by a required submitter. A temporary exception lasts for up to one year and a required submitter is to work toward compliance with the standards.

12. **How long are approved exceptions for field-level variances good for? In many APCD states we are granted variances for a full calendar year. For example, fields where we have the data 50 percent of the time but the threshold is higher.**

Yes, the exception process is intended to capture requests such as relief from the quality thresholds in the CDL. TDI regulations provide that a temporary exception may last for up to one year.

13. **If a carrier has less than 10,000 lives, do we need to put in a request for an extension for both the monthly and historical data, or does the request cover both?**

A single extension request clearly expressing intent for it to apply to both will be sufficient.

File Submission

14. **Once we submit our files, how can we see the results of the validation rules?**

You will receive two emails upon submission. The first will indicate whether the data files are in the correct structure and align with your registration information. The second, an HTML report, will provide checks on the data of each file.

15. How long will it take before we are able to get feedback on test submissions?

During testing, our expectation is to have a 48-hour turnaround. That being said, the Center is also in test mode and may need additional time to correct programming and validation rules. The Center will communicate any significant delays.

16. Will all errors need to be corrected and the report have to be resent? Or, can they be removed if it is determined that field is not applicable?

Please review the CDL carefully as it specifies which fields are required, required if available, or optional. Data provided in any field that does not conform to the CDL standard or that violates the threshold set for a given field will be rejected.

17. If we need to resubmit a single file, do we need to zip all other files together again which already passed?

Yes, the entire zip file is evaluated as pass/fail, any critical errors will require correction and resubmission of the entire zip file.

18. In order to submit files, do we have to log in to TACC's portal?

*Only if uploading a file through the website at **txapcd.org**. If uploading files through SFTP, you will log in via your SFTP client. Regardless of how you submit a file, a valid TACC user ID, password, and Multi-factor Authentication (MFA) Token will be required.*

19. Will the validation fail if certain required fields are not populated/meet minimum threshold? (For example, what if our population does not have oral cavity for 50% of dental services?)

Please review the CDL carefully as it specifies which fields are required, required if available, or optional. Data provided in any field that does not conform to the CDL standard or that violates the threshold set for a given field will be rejected.

Testing

20. How will you handle the submission of production data in March if testing isn't completed for a carrier?

We are expecting that all carriers will be ready for the March 1, 2023 submission go-live. Carriers that are not ready on March 1, 2023 will need to file an extension. An extension would not alleviate the requirement of submitting the particular month(s) requested in the extension.

21. While in the testing phase, will you be working to adjust your expectations and threshold checks? For example, if a field is currently required at 100%, but based on the majority of submissions it

comes about no one can meet that requirement and instead the threshold is changed to say 90% (in order to prevent all submitters to have to submit exceptions).

The Center has adopted the CDL from the APCD Council with very limited modification. Thus, multiple states have been using this CDL without the need for mass exception requests. However, should this scenario occur, the Center has been provided authority in the rule to adjust CDL requirements to make them less restrictive for all submitters. The Center expects this to be a rare case.

22. We have prepared test files and wanted to inquire about the expected sample size. Is there a preference as far as the volume goes? We've prepared files with 20,000 records for each applicable company. Is this acceptable?

Our only guidance is to include as many use-cases as possible: multiple months and volume to ensure the data files are of sufficient quality and that all use-cases have been tested.

23. Is there a specific month/year that we should use for our test files?

There are no test submission scenarios in the rule. That being said, we would like to test with at least 3 to 6 months of historical data, from the years specified in the rule; prefer at least two sequential months from the same year. The testing period is not only for the benefit of the submitters, but also so that the TX-APCD can validate its intake process. As such, we expect there to be feedback and negotiation during the testing phase.

24. When is the Center expecting us to send the test data, if required?

A required submitter must complete a successful test data submission prior to timely submission of monthly or historical data. This means a required submitter has up until February 28, 2023 to successfully submit test data in order to be ready for March 1, 2023, which is when the first monthly data submission begins. That being said, it is preferrable to have the majority of testing done before the end of December 2022 so processes can be streamlined before monthly data submissions start.

Registration

25. When will submitters receive their submitter code, payor code(s), encryption key(s) and any other identification information needed for the required submissions?

The submitter code, payor code(s), and encryption key(s) required to be a valid submitter with the TX-APCD will be issued once a submitter's registration is processed and the submitter has an approved TACC account.

26. Can one TPA use one TACC account and share user and password or are we expected to have multiple TACC accounts per user?

Every person that needs access to the Texas All-Payor Claims Database (TX-APCD) should create their own unique Texas Advanced Computing Center (TACC) account user ID and password. This also ensures your organization meets TACC's security requirements outlined in the Acceptable Use Policy (AUP). Furthermore, the multi-factor authentication (MFA) key is unique per user ID and cannot be shared.

27. Do we need to create the TACC account at the same time when sending the payor registration form or the payor registration will have to be approved first before TACC account is set up?

After a submitter has turned in a registration form, a TACC account should be set up. Both a completed registration form and an approved TACC account are needed in order to finalize processing the registration and issue the submitter code, payor code(s), and encryption key(s) needed to be a valid submitter with the TX-APCD.

28. Is the registration form part of the whole registration process that includes creating the APCD account or is that a separate process?

While submitting the registration form and creating a TACC account are separate steps, both steps are vital to the registration process as a whole. Both a completed registration form and an approved TACC account are needed in order to finalize processing the registration and to issue the submitter code, payor code(s), and encryption key(s) needed to be a valid submitter with the TX-APCD.

29. TPA submitting on behalf of self-funded municipalities. When counting for the 10K exception is it for each of the groups or total block for which we are reporting?

We are unable to answer questions involving an application of the representation of the facts to the law and regulations. We suggest you look at the definition of payor in the law and regulations.

30. I have created a TACC account. What should I do next to complete SFTP connection?

1. *Register with the TX-APCD.*

2. *Set up a TACC account (see Technical Guide for details).*

3. *The Center reviews the registration and follows up if more information is needed.*

4. *Once registration and review is complete, the Center issues the submitter code, payor code(s), and encryption key(s) needed to be a valid submitter with the TX-APCD.*

5. *User submits data via **txapcd.org** or using an SFTP client (such as FileZilla, etc.; see Technical Guide for details).*

31. Can we have multiple TACC accounts for a company? Or is it limited to one TACC account per company? For instance, the registration form that we submitted has three different individual email addresses, can each of those individuals register for a TACC account?

Yes, each person in your organization that needs access to the TX-APCD portal must apply for a TACC account.

Notifications

32. Can you share the timeline for submitting historical data?

The Center provided notification on December 1, 2022 that Historical Data Submission will begin on April 3, 2023. Please go to https://go.uth.edu/txapcd and click on the Notifications tab for further information.

33. Since the Center confirmed that 120-days-notice will be provided for historical data submission, will this push the timeline for the monthly data submissions which is March 2023?

No, the two are independent. Monthly data submissions are required during the first seven calendar days of the month (per the rule). Historical data submissions will be submitted on an ad-hoc basis. The Center does not believe there will be any contention between the two efforts.

Technical

34. Will the SFTP server name always resolve to one IP address, or are there failover/dr/round-robin IP addresses?

Yes, it should, but to ensure your connection is always resolving correctly, please use the fully qualified domain name to let DNS resolve to the correct IP address.

35. Per the Technical Guide there's a two-gigabyte file size limit for the portal, but is there a file size limit for submission via SFTP?

No, the SFTP has no size limit.

36. Will configuration of the SFTP require our IPs to be whitelisted?

No, the TACC SFTP server is available on the public internet.

Miscellaneous

37. Will this PowerPoint presentation be available for us to refer back to?

Yes, the PowerPoint will be available on the TX-APCD website at https://go.uth.edu/txapcd (see the FAQs tab).

38. Will you be posting the slides on the website?

Yes, the PowerPoint will be available on the TX-APCD website at https://go.uth.edu/txapcd (see the FAQs tab).

ACTION ITEMS
• Send notification for December 2022 Submitter Forum.