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

December 16, 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 • DSG Errata • Historical Submission Notice • Submitting a Ticket • How to Find Help • Q&A

DISCUSSION TOPICS – Q&A

General

1. **General comments from the Center:**

The Center thanks everyone for participating in this last submitter forum. The answers provided here are our best understanding of the questions submitted. As always, something may get lost in translation. If there needs to be further clarification on any question, please submit a ticket and we can start that dialogue.

2. **I don't see a way to get from the APCD splash screen to a status screen to view how our submissions are progressing? Any chance you can move the "how to register for school" off this page so it can focus on the APCD services.**

The current TX-APCD website (go.uth.edu/txapcd) is housed within the Center for Health Care Data's (CHCD's) website within the School of Public Health (SPH). The CHCD has already begun the process of creating a stand-alone TX-APCD information-portal and it should be available sometime in 2023. The school-specific tabs are part of the default layout and cannot be removed; we apologize for the

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

*confusion. Secondly, file submissions status, as well as all other future submitter features, will be rolled out to the submitter portal at **txapd.org**. For now, submission status is only via email.*

Common Data Layout

3. In reference to the Payor Claim Control Number, what should be the process if it is different for each transaction (Example: reversals, etc.)?

This answer regards CDLXX008, CDLXX005 and CDLXX007 in the pharmacy, medical and dental files. CDL element CDLXX008 is the original payor claim control number, CDLXX005 is the current payor claim number, CDLXX007 is for versioning if the payor claim control number is retained. In the scenario above, submitter would ensure that element CDLXX008 contains the original claim number and CDLXX005 would be newly assigned payor claim control number for the reversal, etc.

Extensions and Exceptions

4. What if some of our data elements do not meet minimum thresholds?

If the data submitter is unable to achieve the thresholds set in the CDL, they will need to file either an extension, indicating that you need more time to submit a file that meets the threshold; or, an exception, describing your inability to meet the standard. Both exceptions and extensions require Center approval and are for a specific timeframe and must be submitted prior to the compliance date.

5. Are there any exceptions to this requirement for carriers with fewer than X number of policies?

Yes, per the rule, carriers with less than 10,000 covered lives may be granted a temporary extension from the submission requirements. However, the carrier must register and submit an extension request as necessary. Please note, that the 10,000 covered lives threshold is aggregated at the payor/carrier level and not at the plan level.

File Submission

6. Regarding Dental Administrator, in addition to a claim(s) file(s), do they need to file eligibility and provider info?

Yes, an eligibility file is always required with every submission, a provider file will be required if the administrator has a provider network. Then, depending upon the type of business, one or more claim(s) files will be submitted.

7. If Pharmacy data is going to be submitted directly by the PBM, do we need to coordinate this between them and do we notify you of this intention?

The PBM will need to register as a submitting PBM entity. The Center will issue codes and keys specific to that data submitter as well as a Texas Advanced Computing Center (TACC) account. The first step

would be registration. However, the required submitter (the payor) is still accountable to ensure all files are submitted.

8. **Can Dental data be submitted directly by Dental Benefit Administrator on behalf of the carrier, like PBMs can submit Pharmacy data?**

Yes, but they will need to register as a submitting entity under your registration.

9. **I would also like to better understand the requirements of an administrator (e.g. dental) with a limited subset of data applicable to client/plan to submit multiple files (provider, medical, etc.).**

The payor and administrator must coordinate to ensure that all files are submitted in a single submission as per the Data Submission Guide (DSG). The quality and threshold requirements of the CDL are executed at the submission level and the Center cannot merge files on the submitter's behalf.

Testing

10. What is the SLA for data validation on Initial test files submitted?

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.

Registration

11. For annual registration, what date is the registration deadline?

Submitters, per the rule, will need to register every year. The Center expects registration to conclude by January 1 of every year. For those continuing with the APCD year-to-year, this process should be much more expedited than this first year.

12. Even though we submit files monthly, do we still need to register each year?

Submitters, per the rule, will need to register every year. The Center expects registration to conclude by January 1 of every year. For those continuing with the APCD year-to-year, this process should be much more expedited than this first year.

13. A) Can we submit one file for two separately registered entities? B) We have a new offering in 2023 with no active membership. Can an entity start reporting voluntarily if they don't meet the threshold for required reporting?

A) *The Center does not have a preference on how the payor registers and delegates submitting entities. If you would prefer to submit one file for one or more entities, please submit a ticket to determine if you are eligible for a single payor code. Your registration may need to be modified.*

B) There is no minimum threshold for reporting. All submitters are required to submit data unless granted an extension from the Center. Yes, you may always voluntarily submit data, but you may want to submit the new offering as a test file to ensure it doesn't cause problems with your active business. You may also separate the two files by requesting another payor/submitter code combination. A required submitter must file an extension request for approval to prove their extension eligibility.

14. **Will the submitter code and payor codes be the same or would they be different if a PBM was submitting for a client for a portion of the reporting period but the client would be submitting historical data because they were with a previous PBM vendor partner?**

Each PBM would submit their own registration form, to receive their own submitter/payor code, encryption keys, etc. At time of registration, please indicate the time period for which they will be submitting data.

15. **We are a TPA currently delegated to submit for one client. The registration form I completed did not call out which client we were submitting for, how best to update the registration form to provide this information.**

Please submit an updated registration form with the changes. Please send the registration to ***txapcd@uth.tmc.edu****.*

Notifications

16. **Is the historical data from 1/1/2019–10/31/2022? or 1/1/2019–9/30/2022?**

Please see https://go.uth.edu/txapcd - Notification Tab for historical file submission window. The historical files are from January 1, 2019 to the date of your first monthly submission. Assuming, a submitter's first monthly submission starts in March 2023, for November 2022 adjudicated claims data, the historical file end-period would be October 31, 2022.

17. **I may have misheard, but for historical data, is it to be broken up by year for submission?**

The historical files should be submitted as you would a monthly submission – by year-month. So, if your company is submitting historical files for every month in 2019, the Center would expect 12 files. The files may be sent in any year-month order. Please see https://go.uth.edu/txapcd - Notification Tab for historical file submission window.

Technical

18. **MFA appears to be required for all uploads. Our company wants to automate all these uploads, how can this work with MFA?**

*Please submit a ticket via the portal at **txapcd.org** describing your business needs. The TACC Team will address your ticket.*

19. Second follow-up on IP Addresses for firewalls.

The preferred method for resolution is to use the fully qualified domain name. However, if this is not possible, please use the public IP for secure.corral.tacc.utexas.edu which resolves to 129.114.52.15. This is a static IP, but it may change in the future.

20. Is there a list of different encryption types that will be supported for the zip files?

Currently, only symmetric-key encryption is supported. However, the Center is working on support for asymmetric-key encryption and will advise the submitter community if and when it becomes available.

<u>**Miscellaneous**</u>

21. What is the SLA for the tickets?

The ticket queue is monitored during normal business hours with a dedicated team member. Typically, tickets are responded to within a day. Ultimate resolution depends on the difficulty of the issue, if further research is needed, etc.

22. Can we get a copy of the slides?

Yes, the slides will be posted at https://go.uth.edu/txapcd - FAQs Tab.

ACTION ITEMS
• Send notification for January 2023 Submitter Forum.