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

March 24, 2023, Submitter Forum*

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

AGENDA
• Monthly & Historical File Submission Go-Live Update • Notifications • General Mailbox vs. Tickets • Medicaid Data (to come from HHSC) • Support Ticket Do & Don't • Deactivated TACC Accounts • Q&A

DISCUSSION TOPICS – Q&A

General

1. General comments from the Center:

The Center thanks everyone for participating in this 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.

Notifications

*As stated in the submitter forum, the initial start of the TX-APCD will be delayed by **at least 60 days**. The TX-APCD will provide **at least 30 days' notice** prior to go-live. The calendar will remain the same with monthly submissions starting first, followed a month later by historical file submissions. The TX-APCD will ensure that we communicate fully the new calendar and technical changes. Please continue to test during the delay.*

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* Some questions submitted have been edited for clarity.

2. **Which month of data would the TX-APCD prefer for the revised monthly delivery date? What is the new delivery window for the historical data? Would historical submission be moved by 60-days as well?**

We are unable to provide concrete dates as of yet, however, the submitters should think of the calendar as sliding by 60-days (at least).

3. **Will we get advance notice of the server change that you mentioned earlier in the call, so that we can let our internal teams know?**

Yes, we plan to provide as much advanced notice as possible to allow for any necessary technical changes. The TX-APCD plans to communicate through email, forums, FAQs, and notifications.

Common Data Layout

4. **If we're submitting the provider's NPI on both the Provider and Medical files, why are the Billing and Rendering Provider ID fields required for submission?**

There are situations in which the Billing and Rendering provider are different.

5. **Just to clarify, you are not anticipating any changes to the layout that we currently using, correct?**

Yes, that is correct. We expect to use the current Common Data Layout (CDL) for the foreseeable future, however, the TX-APCD has issued Errata for the CDL and has posted that on the TX-APCD website at: https://go.uth.edu/txapcd (scroll down to Technical Guides tab).

Extensions and Exceptions

6. **If we received a one-year submission extension, can we submit test files up to that one-year submission extension deadline?**

Yes, the rule only requires a single successful test submission prior to submitting production files. However, the guidance from the TX-APCD is to test three to six data periods to ensure you are finding all corner cases as well as ensuring the smoothest start to monthly submissions.

7. **Does the one-year extension start from when it goes live or another date?**

Extensions and exceptions are typically granted based on calendar year.

File Submission

8. The notifications that are emailed with the pass/fail status of the files does not include the CDL field number. Is that going to be added?

Thank you for this feedback as we are always looking for ways to improve submissions. With the current go-live start date delay, this might be something we can add prior to go-live, however, due to technical reasons, it might be added to the roadmap as a future enhancement.

9. I have a question about Vision only plans. If our Vision plan doesn't include any medical vision benefits/claims, are they still required to submit to the TX-APCD?

Plans that provide limited-scope dental or vision benefits are not health plans for which the regulation is applicable. Please review section(s) §21.5401 Applicability and Texas Insurance Code §1501.002 with your legal counsel.

10. Will acupuncture or vision claims need to be submitted?

If acupuncture creates a claim, it should be submitted to the TX-APCD. For vision claims, please see answer to question No. 9.

11. Is it possible to separate medical and dental enrollment files?

The TX-APCD provides this flexibility using assigned payor and submitter codes. You could have one payor/submitter code submit Medical Eligibility, Medical Provider and Medical Claims in a single zip file submission and another payor/submitter code submit Medical Eligibility, Dental Provider and Dental Claims in a separate zip file submission. However, if sending all five files in a single zip-file submission, the eligibility files must be submitted in a single file. To add additional payor/submitter codes, you will need to submit an amended registration.

12. If a submission is made through SFTP via a system-to-system account, how are we notified of the results? The initial accept or rejection of the package comes to the people on the registration contact list but not sure how do get details on the file processing results?

The email associated with the account performing the file upload will get two standard system notifications: system receipt of file and submission validation report. Other registration contacts that selected "system notifications" would be included in the CC: of the email. If you want to receive these system notifications, please send an email to txapcd@uth.tmc.edu with your contact information and the payor code(s) for which you would like to receive notifications.

13. Follow-up to the previous results question, does the validation results email (after the files are processed) go to the same list as the system notification accepted/rejected email?

Yes, the validation report will be sent to the account that uploaded the file as well as any contacts that selected "system notifications" upon registration.

14. The file package is a zip file containing all the data files to be submitted. For example, to submit dental claims, we would need to provide the ME (medical eligibility), PV (provider file), and DC (dental claims) in a single zip file? Is there not an option to submit these files in a separate submission?

Unfortunately, no. The TX-APCD expects to receive all files for a single data period (month) to be submitted in a single zip file.

15. Once we are submitting production files, can we submit files early? For example, submit January reporting period files in February instead of the 6-month difference?

No, we only expect intake of monthly submissions during the 1st–7th of the calendar month based on the submission calendar in the regulation. Historical submissions will be accepted anytime during the compliance window.

16. Follow-up to the 90-days' file-submission delay, medical and pharmacy claims files are pulled based on date claim processed?

No, the date is based on the adjudicated date.

17. Our files are created two-business days after the reporting period is done. It doesn't matter when the file is generated, two or 90 days, the file will be the same.

*The file submission calendar is 90-days' (3 months) delayed from the **adjudicated** date of the data-period month. Based on the regulation, **§21.5404: Data Submission Requirements**, "(h) Payors must include data in medical, pharmacy, and dental claims data files for a given reporting period based on the **date the claim is adjudicated, not the date of service associated with the claim**." Due to the variety of processing across all submitters, 90 days was agreed upon to account for all adjudicated claims in the submission data period.*

Testing

18. Is there any way that we can test SFTP connection without sending test files?

Yes, you can upload any file (e.g., a blank test.txt file). The system will reject the file without any further processing. The submission receipt notification will be sent confirming upload.

Technical

19. Can TACC accounts be non-expiring?

As discussed in the submitter forum, only accounts that don't log in every 120 days would expire. The account doing the uploads will not expire. There are not regular password resets for active TACC accounts (log in within the last 120 days).

20. What are the changes coming to the SFTP process? When will we know more about it? Will we receive any guidelines about it?

The TX-APCD will communicate the new go-live dates as well as any technical changes via email, submitter forums, website notifications, and updates to the Data Submission and Technical Guides. We also understand that firewall rules may need to be adjusted and plan to provide this information as soon as we can confirm it.

Miscellaneous

21. The submitter portal will not allow any attachments. How can we send an attachment with a ticket?

The TX-APCD does allow including attachments when creating a ticket via the TX-APCD portal (txpacd.org). We tested this after the submitter forum, and it was working correctly (attachments are limited to 10MB). If you are unable to add attachments, please create a ticket and support will review this issue.

22. How do you protect or attach PHI to a ticket TX-APCD prefers not to send via secure email?

We should not attach PHI to either an email or the ticketing system; if a discussion needs to occur for a particular issue, please create a ticket so that we can set up a meeting.

23. Why do the ticket emails from TX-APCD not have the entire chain history when responding back to the payors?

This is a preference from our support group and a technical workaround due to our ticketing system. Since submitters may and have responded to the ticket via email, some tickets have the entire email chain posted in the ticket multiple times; this makes it difficult to follow the conversation. The standard practice is to include the question(s) from your most recent ticket update in the response.

24. 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 April 2023 Submitter Forum.