

IAIABC Issue Resolution Request Guideline

April 27, 2017

Introduction

An Issue Resolution Request (IRR) is a formal request for action requesting resolution of an issue with an IAIABC EDI Standard. The IRR process is the method for modifying or clarifying the existing IAIABC EDI standards. Since the standards are in use by jurisdictions and their trading partners across the country, requested changes must be seriously considered for their necessity, impact, benefits, and consequences to all users. Just as the standard is the product of extensive work by jurisdictions and trading partners, Issue Resolution Requests also call for the input, involvement, and acceptance of all stakeholders.

This guideline is based on the Issue Resolution Request Process and Policies adopted by the IAIABC Board of Directors on December 13, 2016.

Roles and Responsibilities

Board of Directors

The IAIABC Board of Directors is the governing body of the IAIABC which includes the EDI Program. It sets the vision, mission, and strategic direction of the Association. It is made up of thirteen jurisdictional member representatives, as well as the Chair of the Associate Member Council and Executive Director as ex-officio members.

EDI Council

The mission of the EDI Council is to promote and facilitate voluntary consensus standards for the electronic exchange of data and safeguarding their integrity so information can be exchanged economically and be readily accessible and comparable between jurisdictions. The EDI Council is composed of representatives of 12 Jurisdictional members and 12 EDI Associate members. The EDI Standards Task Group and EDI Committees report to the EDI Council. Request for extensions and appeals will be determined by the EDI Council.

EDI Standards Steward

The IAIABC Director of Standards Development and Outreach serves in this role to ensure neutrality and consistency. The EDI Standards Steward has oversight of all IAIABC EDI Standards and is the gatekeeper of the IRR Process. As the IRR Process gatekeeper, the EDI Standards Steward will determine when a resolution is ready to advance to 14 Day Review and when it is ready for vote.

The EDI Standards Steward is responsible for maintaining the current status of all pending requests along with the key tracking dates (see appendix a. for a complete list of statuses and tracking dates). The EDI Standards Steward is also responsible for IRR status reporting. A Weekly IRR Status Report of all pending issues is published and posted to the EDI Standards Notification online community at the end of each week. A Monthly IRR Status Report is emailed to EDI Council Members, the IAIABC EDI Council Board Liaison and the Executive Director of the IAIABC. A Quarterly IRR Status Report is provided to the IAIABC Board of Directors.

EDI Standards Task Group

A special task force led by the EDI Council Chairs and comprised of all of the EDI Committee Chairs and Vice Chairs to oversee the maintenance of the EDI standards. This task force reports to the EDI Council and is called upon when there is a question or impasse regarding the appropriateness of a proposed change or resolution.

EDI Systems Committee

The EDI Systems Committee provides technical support to all EDI committees and subcommittees, including but not limited to the functions of new development, maintenance, training, problem resolution, and consultation, and will generate other appropriate documentation for implementation efforts. The EDI Systems Committee also makes recommendations on technical and business requirements to the EDI Claims, POC, and Medical Committees and the EDI Council for policy review and submission to the IAIABC Board of Directors.

EDI Committee Members

EDI Committee members are responsible for the development and maintenance of EDI standards to ensure that those not party to the standard setting process are represented.

IRR Submission

Any individual or individuals from an IAIABC jurisdictional member organization, IAIABC EDI member organization, or an IAIABC committee or work group can submit an IRR. IRRs are initiated by completing an IRR request form and submitting it to the IAIABC. An electronic IRR request form is available on the IAIABC website as follows: Submit an Issue Resolution Request. The IAIABC tracks the status of all pending IRRs and a weekly report is posted to the EDI Standards Notification online community of the IAIABC website.

The minimum information to be included when submitting an IRR is the date, submitter's name and affiliation, e-mail address and contact phone number. A request type must also be included on the completed form. There are four types of Issue Resolution Requests as follows:

- Legislative Mandate (with accompanying support): Changes from a legislative mandate will be given priority and will be evaluated by the committee to confirm it can be accommodated. If there is a concern about inclusion, it shall be brought to the EDI Standards Task Group.
- External to the Standard (with accompanying support): Changes from an external standard (e.g.: WCIO, X12, NCPDP, etc.) will be given priority and will be evaluated by the committee to confirm it can be accommodated. If there is a concern about inclusion, it shall be brought to the EDI Standards Task Group.
- Clerical: Clerical changes will be discussed with the committee leadership but not voted on by the
 committee. It will be the responsibility of committee leadership and EDI Standards Steward to determine
 which issue requests are clerical changes. Examples include typos, word changes, misspellings, and
 edits that do not change the substance of the standard.
- Other: All other changes will be considered to be substantive changes having a normal priority. These
 changes will be evaluated by the committee for inclusion within the standard. If there is concern about
 inclusion, it shall be brought to the EDI Standards Task Group for evaluation.

A description of the Business Requirement or Issue should also accompany the request. As part of the business requirement/issue section, the submitter should complete the following questions:

- 1. What is the business requirement/issue? Cite any applicable statute/rule, and attach a copy, if desired.
- 2. Is the information being collected at this time by the submitter? If yes, detail the current method of collecting the information.
- 3. If the information is not currently being collected, what timeline does the submitter expect or require for implementation of the proposed change?
- 4. What other methods of collection or reporting, if any, have been considered?

If desired, a proposed resolution may also be included with the request but is not required. See diagram 1.0 for a high-level overview of the IRR process workflow.

Actions Taken Upon Receipt of an IRR

Within five business days following receipt of an IRR, the EDI Standards Steward will review the IRR to assure completeness and clarity, assign an IRR tracking number, log the request within the IRR Database, and post the issue to the appropriate EDI online community. The format of the IRR tracking number is XXX####, where XXX identifies the EDI Committee having ownership of the issue and #### is a unique number assigned by the EDI Standards Steward. The following represents the valid EDI Committee abbreviations to be used within the IRR tracking number:

- POC Proof of Coverage
- **CLM** Claims
- MED Medical
- SYS Systems

Evaluation of the Proposed Change and or Resolution (Optional)

A request may be referred to the EDI Standards Task Group upon receipt or during the development of a resolution when there is a question or impasse regarding the appropriateness of a proposed change or resolution. The EDI Standards Task Group completes an evaluation of the proposed change and or proposed resolution. The group may pull in subject matter experts as needed. A period of 30 business days will be provided to complete the evaluation and the evaluation time will not be included within the IRR timeliness statistics. Each member of the EDI Standards Task Group is provided with one vote. If the EDI Standards Task Group is comprised of more than one person from the same company/organization, the company/organization will only have one vote. At the conclusion of this evaluation, a final determination will be provided to the EDI Standards Steward who will be responsible for communication with the requester, EDI Council and the respective EDI committee. Should the EDI Standards Task Group recommend that the request not proceed, the EDI Standards Steward will proceed with closure of the request (see diagram 1.1 – standards evaluation workflow). If the requester does not agree with the decision, they may invoke the appeal process (see diagram 3.0 – appeal process workflow).

Development of a Final Proposed Resolution

EDI committees are responsible for the development of a final proposed resolution. In some cases, an issue may be received having a proposed resolution that becomes the final proposed resolution. Otherwise, the committee may propose a final resolution or the committee leadership may determine that a workgroup made up of committee members and other subject matter experts is needed (see diagram 3.1 – Propose / Refine Resolution). For issues that require a technical solution, a representative of the EDI Systems Committee is required to work jointly with the EDI Committee or workgroup to propose a final resolution. The final proposed resolution shall include the severity level (see Severity Assessment section of the Release Management Process and Implementation Guideline), impact statement (if applicable) and the proposed implementation timeline.

Initially, the committee shall consider the submitter's statement of the business need, the following additional questions, and any other relevant factors:

- 1. Does this request follow the practical flow within the standard?
- 2. Is the requested data currently being collected? If not, how and where could it be gathered? What are the consequences of collecting or not collecting the data?
- 3. Do others have a common need for the requirement/issue in this IRR?
- 4. If the submitter proposed a solution, is it feasible for trading partners to implement? Are there alternatives available to the meet the submitter's needs? Is there a better solution?
- 5. How difficult and/or costly would it be to implement the request?
- 6. What level of data quality can be expected?
- 7. If implemented, what is the potential impact to the standard and those currently in production with the standard?

Following this initial evaluation, if there is a question or impasse regarding the appropriateness of a proposed change or resolution the committee may opt to refer the issue request to the EDI Standards Task Group (see *Evaluation of the Proposed Change and or Resolution* section above).

Each EDI Committee has a dedicated online community where Issue Resolution Requests (IRRs), proposed resolutions and comments are posted. By default, all EDI Committee members are participants of their respective online communities for the purpose of building committee consensus on proposed resolutions. Committee members are encouraged to utilize these communities to review issue requests, propose resolutions and provide feedback on proposed changes to the EDI Standards. Committee Leadership should moderate their respective online communities and address questions that have not received a response within 5 business days. Members should be aware that some issues may only be discussed within the respective online community due to timing. The four EDI online communities are as follows:

- Claims Reporting Issues This community addresses the Issue Resolution Requests (IRRs) and proposed resolutions for the IAIABC Claims Standard
- **Medical Reporting / eBilling Issues** This community addresses the Issue Resolution Requests (IRRs) and proposed resolutions for the IAIABC Medical Bill Data and eBilling Standards
- **Proof of Coverage Reporting Issues** This community addresses the Issue Resolution Requests (IRRs) and proposed resolutions for the IAIABC Proof of Coverage Standard
- System Support Issues This community addresses the Issue Resolution Requests (IRRs) and proposed technical resolutions for all of the IAIABC EDI Standards and Trading Partner tables

Timeliness is an important consideration that will be measured throughout the IRR process. All issue requests received 60 business days prior to The Forum or Convention are to be included on the agenda for the upcoming meeting. A committee teleconference shall be held between 30-45 days prior to The Forum or Convention to discuss issue requests and assign workgroups (as necessary). The committee will meet at The Forum and at the Convention. The expectation is all open issue requests will have a proposed resolution and will be presented by the committee by the end of the meeting. Committee meeting minutes must reflect all proposed solutions and the proposed dates for final 14-day review and voting. All solutions shall be submitted for public comment within 14 business days after the end of the meeting or any 45-day extension granted by the EDI Council. Serving as the IRR Process gatekeeper, the EDI Standards Steward will determine when a resolution is ready to advance to Final 14 Day Review. A period of 14 business days for feedback and comments from those unable to participate in the meeting shall be provided. Comments received during this time will be reviewed by committee leadership. The committee may choose to respond to the comments raised during this time, but are not required to. Following the public comment period, the final resolution will be sent to the voting body unless the committee leadership decides to modify the proposal based on feedback received. Issue requests not resolved by the Committee at The Forum or Convention shall be brought to the EDI Council. The EDI Council will make a determination on whether to grant a 45 day extension to the committee to continue working on the issue request or declare the issue request closed (see diagram 1.2 – request for an extension workflow).

Voting Process

Serving as IRR Process gatekeeper, the EDI Standards Steward will determine when a resolution is ready to advance for voting. Changes will be adopted with a 2/3 majority vote. The EDI Standards Steward will publish a summary of the voting results within 5 business days of the vote ending. Depending on the voting outcome, the status of the IRR will be updated as either Approved or Not Approved by the EDI Standards Steward. Approved resolutions will be included in the Standard documentation within 360 days of submission, with the goal to be 180 days or less. The Implementation Guide Supplement and Trading Partner Table changes will be updated within 30 business days of the approval date (see diagram 2.0 – voting process workflow).

The vote language will be prepared by the EDI Standards Steward and reviewed with the Committee Leadership. The resolution must contain accurate and complete information and include any necessary accompanying attachments so stakeholders can fully understand the resolution on which they are voting. In addition, the vote language shall contain both:

- The content of the proposed change, and
- The proposed implementation timeline, whether or not it is an exception to the standard implementation timeline. If the proposed implementation timeline is an exception to the standard, the vote language shall include the specific timeline proposed.

The EDI Standards Steward will e-mail the vote language and link to the online voting location to the voting body. The e-mail message will include the closing date of the voting period which is 14 business days from the vote start date. A voting notification will also be posted to the EDI Standards Notification online community that announces the voting period for the IRR.

Vote options are

- to approve ("yes"),
- to disapprove ("no") with supporting information, or
- to abstain

Note: Abstentions are not included within the calculation of the 2/3rds majority.

Composition of the Voting Body

The voting body is comprised of current IAIABC jurisdictional and EDI members. Each eligible organization is allowed one vote per IRR. The IAIABC maintains a list of IAIABC jurisdictional and EDI voting members which is reviewed and updated on an annual basis. Each jurisdictional and EDI member may designate a voting representative for each standard product (Claims, Medical, Proof of Coverage), preferably with expertise in the subject matter. A secondary voter designee, to serve as a backup, is also allowed. It is the responsibility of the IAIABC member or EDI member organization to determine which registered participant will vote on behalf of the organization for any given issue.

It is the responsibility of the designated voter (or the alternate, if the designated voter is not available) to discuss the issue up for vote with their organization's subject matter expert(s) and then vote accordingly. Since there may be times when the designated voter is not available during the voting period, the alternate will cast the vote in those situations. This arrangement will ensure that those entities that are eligible to vote on an IRR are not foreclosed from this privilege in the event the primary designated voter is not able to vote. If an organization casts multiple votes on the same IRR, the EDI Standards Steward will notify the primary and alternate voter from that organization and request that all but one vote be withdrawn. If there is no response from that organization, the alternate's vote will be excluded from the count.

Appeal Process

An appeal is allowed within 20 business days of publication of the final voting results. An appeal must be heard by the EDI Council within 30 business days of the notice of the appeal. An electronic appeal form is available on the IAIABC website as follows: Submit an Appeal to an Issue Resolution Request Decision.

The minimum information to be included when submitting an Appeal Request is the date, submitter's name and affiliation, e-mail address, contact phone number, the IRR number and impacted standard. A summary of the source of issue or disagreement along with the desired outcome must also be included.

Appeals will be heard by the EDI Council and a copy of the appeal will be sent to the Board of Directors. If the Appellant is not satisfied with the Decision from the EDI Council, a final appeal can be made to the Board of Directors within 20 business days of publication of the EDI Council determination. The Board of Directors may choose to hear the appeal or affirm the Decision of the EDI Council.

An EDI stakeholder who believes that they have been negatively impacted by the outcome of an IRR decision may file an appeal. The individual/organization with the grievance who filed the appeal is considered to be the Appellant. The individual/organization that benefited from the IRR decision is considered to be the Appellee. There may be more than one named Appellant and Appellee. The EDI Council will make a determination of the named parties upon receipt of multiple appeal requests related to the same issue. The appeal proceeding will be limited to all originally named parties. The addition of other parties will not be permitted. All named parties will be provided with the opportunity to submit documentation that supports their case in advance of the proceeding with a cutoff of 5 business days prior to the proceeding. During the proceeding, each side will be provided with 20 minutes to present their case and respond to questions and other inquiries from the group. 20 minutes will also be provided to the body making the determination. All named parties will be required to recuse themselves from the determination. Voting is based on a simple majority and a quorum is required. The same process and parameters apply to both the EDI Council and the Board.

The determination of the Board of Directors is final (see diagram 3.0 – appeal process workflow).

Note: A new IRR is required if the requester wishes to present an alternative solution for consideration upon receipt of final determination.

Diagram 1.0: Normal Workflow (high-level)

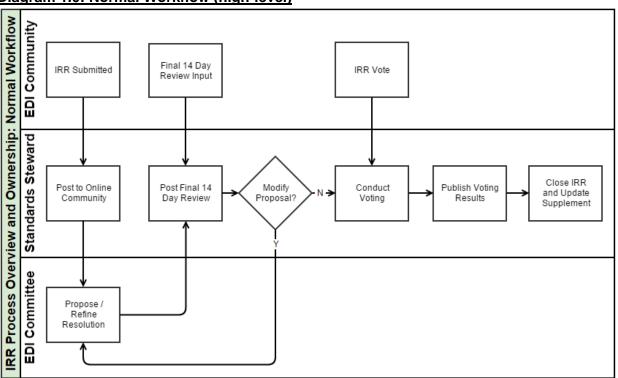


Diagram 1.1: Standards Evaluation Workflow

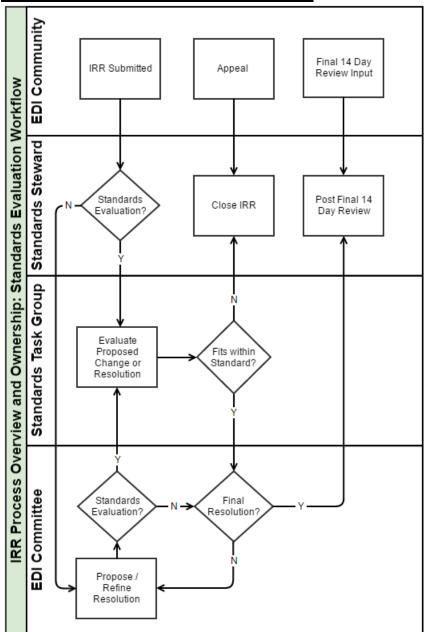


Diagram 1.2: Request for an Extension Workflow

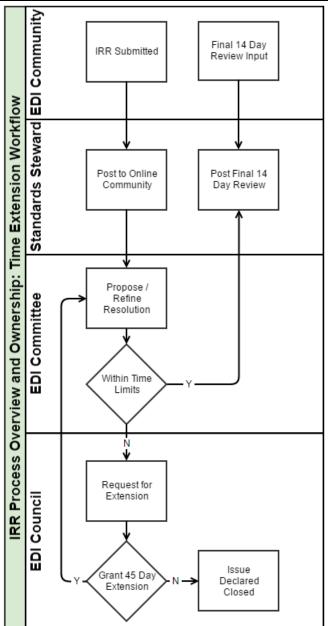


Diagram 1.3: Propose / Refine Resolution

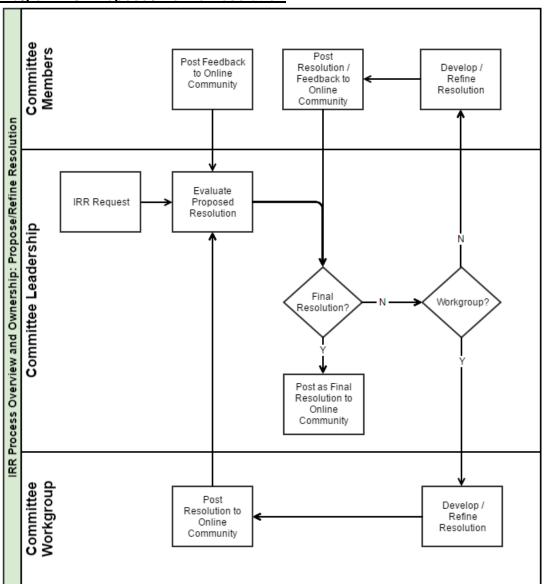


Diagram 2.0: Voting Process Workflow

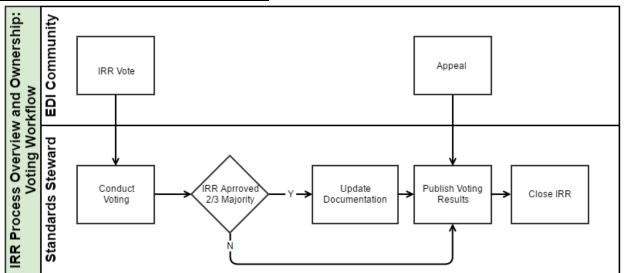
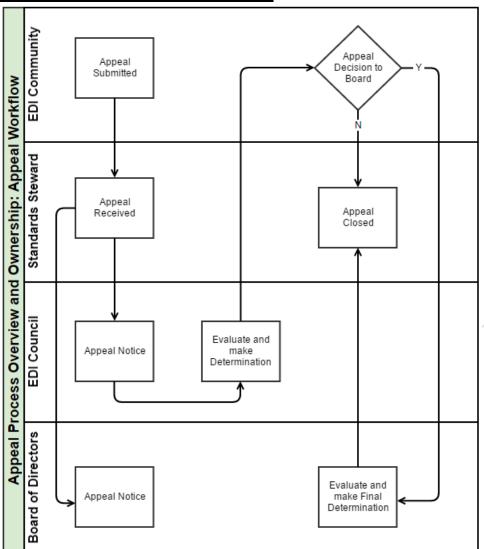


Diagram 3.0 - Appeal Process Workflow



Appendix A.: IRR Statuses and Key Tracking Dates

The following represent the various statuses as an issue progresses through the IRR process:

- Pending Resolution
- Pending 14 Day Review
- Pending Vote
- Cancelled
- Withdrawn
- Closed Not Approved
- Closed Pending Publication
- Closed Published
- Closed Archived

The following tracking dates are logged and stored within the IRR Database for each request:

- Received Date the date of receipt of an IRR request
- Posted Date the date that the IRR was posted to the discussion forum
- Final Proposed Resolution Date the date the final proposed resolution was achieved
- 14 Day Review Start Date the date the final 14 day review period began
- 14 Day Review End Date the date the final 14 day review period ended
- Voting Start Date the date the voting period began
- Voting End Date the date the voting period ended
- Approval Date the date the resolution was approved
- Supplement Updated Date the date the Supplement was published
- Systems Assigned Date the date Systems Committee was assigned
- Target Publication Date- the date of desired publication
- Withdrawn / Cancelled Date the date the issue was withdrawn or cancelled