REQUEST

For version 005010 and version 005050, when a 999 transaction is received, how does the receiver determine from the contents of the 999 whether the 999 is reporting "X12 Standard Conformance" or the 999 is reporting "Implementation Guide Conformance" -- particularly when
(a) no errors are reported, and/or
(b) no implementation guide-based errors are reported?

REFERENCED X12 STANDARDS
The following X12 Standards were reviewed in developing this interpretation:
X12.1 Transaction Sets
X12.6 Application Control Structure Version 005 Release 010
(Defines syntactical architecture of data)

FORMAL INTERPRETATION

There is no indicator in the 999 transaction set that describes whether it is reporting X12 Standard or Technical Report Type 3 (i.e. Implementation Guide) conformance. However, by definition, the 999 is specifically for use in reporting Implementation Guide conformance. (from the 999 - Implementation Acknowledgment, purpose and scope, "The transaction set can be used to define the control structures for a set of acknowledgments to indicate the results of the syntactical and relational analysis of the electronically encoded documents, based upon a full or implemented subset of X12 transaction sets.")

Since compliant Implementation Guides must be compliant with the X12 standard from which they are created, the reporting of compliance (or non-compliance) with an implementation Guide includes compliance with the X12 standard.

The 999 Transaction Set is used for reporting on TR3 conformance and must not be used for reporting only X12 Standard compliance.

FURTHER DISCUSSION:

Note 1/0400 (from the 999 X12 Standard Transaction Set) states, "The data segments of this standard are used to report the results of the syntactical analysis of the functional groups of transaction sets; they report the extent to which the syntax complies with the standards or proper subsets of transaction sets and functional groups as expressed in compliant implementation guides."