

REQUEST

The WEDI Acknowledgements Subworkgroup is requesting ASC X12 to provide a formal interpretation regarding the recommended and appropriate use of the 999 and 997 for the HIPAA- mandated 5010 Healthcare TR3 implementation guides. It is unclear at this time what X12 requires for the 5010 HIPAA implementation. There are conflicting statements found within the implementation guides. For example, in the front matter of the guides 005010X222(837), in sections 1.6, 1.6.1 and 1.6.2 - it appears there is no recommendation.

1.6 Transaction Acknowledgments

There are several acknowledgment implementation transactions available for use. The IG developers have noted acknowledgment requirements in this section. Other recommendations of acknowledgment transactions may be used at the discretion of the trading partners. A statement that the acknowledgment is not required does not preclude its use between willing trading partners.

1.6.1 997 Functional Acknowledgment

The 997 informs the submitter that the functional group arrived at the destination. It may include information about the syntactical quality of the functional group. The Functional Acknowledgment (997) transaction is not required as a response to receipt of a batch transaction compliant with this implementation guide. The Functional Acknowledgment (997) transaction is not required as a response to receipt of a real-time transaction compliant with this implementation guide. A 997 Implementation Guide is being developed for use by the insurance industry and is expected to be available for use with this version of this Implementation Guide.

1.6.2 999 Implementation Acknowledgment

The 999 informs the submitter that the functional group arrived at the destination. It may include information about the syntactical quality of the functional group and the implementation guide compliance.

The Implementation Acknowledgment (999) transaction is not required as a response to receipt of a batch transaction compliant with this implementation guide.

The Implementation Acknowledgment (999) transaction is not required as a response to receipt of a real-time transaction compliant with this implementation guide.

A 999 Implementation Guide is being developed for use by the insurance industry and is expected to be available for use with this version of this Implementation Guide.

However in guide 005010X279 section 1

1.6.1 997 Functional Acknowledgment

The 997 informs the submitter that the functional group arrived at the destination. It may include information about the syntactical quality of the functional group.

The Functional Acknowledgment (997) transaction is not required as a response to receipt of a batch transaction compliant with this implementation guide.

The Functional Acknowledgment (997) transaction is not required as a response to receipt of a real-time transaction compliant with this implementation guide.

A 997 Implementation Guide is being developed for use by the insurance industry and is expected to be available for use with this version of this Implementation Guide.

1.6.2 999 Implementation Acknowledgment

The 999 informs the submitter that the functional group arrived at the destination. It may include information about the syntactical quality of the functional group and the implementation guide compliance.

The Implementation Acknowledgment (999) transaction is required as a response to receipt of a batch transaction compliant with this implementation guide. The 999 Implementation Acknowledgment will also report Implementation Guide errors that cannot otherwise be reported in a 271 AAA segment if the transaction is rejected. See Section 1.4.10 - Rejected Transactions.

The Implementation Acknowledgment (999) transaction is not required as a response to receipt of a real-time transaction compliant with this implementation guide. The 999 Implementation Acknowledgment is required only if a real-time transaction is rejected for Implementation Guide errors that cannot otherwise be reported in a 271 AAA segment. See Section 1.4.10 - Rejected Transactions.

A 999 Implementation Guide is being developed for use by the insurance industry and is expected to be available for use with this version of this Implementation Guide.

Upon further investigation, it appears the guide referenced in section 1.6.1 - Guide 005010X230 states in section:

1.1 Implementation Purpose and Scope

This implementation guide is intended to enable a receiver of an X12 transaction set, related to healthcare business processes, to report syntactical errors against the X12 standard, or to acknowledge receipt of an error-free transaction set.

Later in the same implementation guide - the following is stated:

1.3.2 Other Usage Limitations

The ASC X12 997 transaction set is designed to report only on syntactical conformance against the X12 standard or proper subsets of the X12 standard.

This 997 implementation guide can NOT be used for responding to any implementation guideline (TR3).

This 997 implementation guide can NOT be used for any application level validations.

The ASC X12 997 transaction set is designed to respond to one and only one functional group (i.e. GS/GE), but will respond to all transaction sets (i.e. ST/SE) within that functional group. It can not respond to (i.e. accept or reject) any subset of a transaction set.

This ASC X12 997 Implementation Guideline can NOT be used to respond to any management transactions sets intended for acknowledgments, i.e., TS 997 and 999, or interchange control segments related to acknowledgments, i.e. TA1 and TA3.

The 999 Implementation guide (005010X231) Section 1.1. states:

The purpose of this implementation guide is to provide standardized data content and structure to users of the ASC X12 999 transaction set for Health Care Insurance.

This implementation guide is intended to enable a receiver of a functional group based on an X12 Implementation Guideline (TR3) related to Health Care Insurance business processes, to report the syntactical and relational analysis as specified by that implementation guideline (TR3), or to acknowledge receipt of an error-free transaction set.

This 999 is not limited to only Implementation Guide (IG) errors. It can report standard syntax errors, as well as IG errors.

It is requested X12 clarifies the position concerning the 999 versus the 997 when implementing a 5010 Healthcare TR3.

REFERENCED X12 STANDARDS

The following X12 Standards were reviewed in developing this interpretation:

X12.1 Transaction Sets

997 - Functional Acknowledgment

Purpose and Scope:

This X12 Transaction Set contains the format and establishes the data contents of the Functional Acknowledgment Transaction Set (997) for use within the context of an Electronic Data Interchange (EDI) environment. The transaction set can be used to define the control structures for a set of acknowledgments to indicate the results of the syntactical analysis of the electronically encoded documents. The encoded documents are the transaction sets, which are grouped in functional groups, used in defining transactions for business data interchange. This standard does not cover the semantic meaning of the information encoded in the transaction sets.

999 - Implementation Acknowledgment

Purpose and Scope:

This X12 Transaction Set contains the format and establishes the data contents of the Implementation Acknowledgment Transaction Set (999) for use within the context of an Electronic Data Interchange (EDI) environment. 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. The encoded documents are the transaction sets, which are grouped in functional groups, used in defining transactions for business data interchange. This standard does not cover the semantic meaning of the information encoded in the transaction sets.

Technical Report Type 3 (TR3)

005010X230 Functional Acknowledgment For Health Care Insurance (997)

Section 1.1

The purpose of this implementation guide is to provide standardized data content and structure to users of the ASC X12 997 transaction set. This implementation guide is intended to enable a receiver of an X12 transaction set, related to healthcare business processes, to report syntactical errors against the X12 standard, or to acknowledge receipt of an error-free transaction set.

When implementing this TR3 in conjunction with the 999 transaction set, this 997 implementation guide can NOT be used for responding to any implementation guideline (TR3).

This 997 implementation guide can NOT be used for any application level validations. The purpose of this implementation guide is to provide standardized data content and structure to users of the ASC X12 997 transaction set. This implementation guide is intended to enable a receiver of an X12 transaction set, related to healthcare business processes, to report syntactical errors against the X12 standard, or to acknowledge receipt of an error-free transaction set.

When implementing this TR3 in conjunction with the 999 transaction set, this 997 implementation guide can NOT be used for responding to any implementation guideline (TR3).

This 997 implementation guide can NOT be used for any application level validations.

Section: 1.3.2 Other Usage Limitations

The ASC X12 997 transaction set is designed to report only on syntactical conformance against the X12 standard or proper subsets of the X12 standard.

This 997 implementation guide can NOT be used for responding to any implementation guideline (TR3).

This 997 implementation guide can NOT be used for any application level validations.

The ASC X12 997 transaction set is designed to respond to one and only one functional group (i.e. GS/GE), but will respond to all transaction sets (i.e. ST/SE) within that functional group. It can not respond to (i.e. accept or reject) any subset of a transaction set.

This ASC X12 997 Implementation Guideline can NOT be used to respond to any management transactions sets intended for acknowledgments, i.e., TS 997 and 999, or interchange control segments related to acknowledgments, i.e. TA1 and TA3.

005010X231 Implementation Acknowledgment For Health Care Insurance (999)

Section 1.1 Implementation Purpose and Scope

The purpose of this implementation guide is to provide standardized data content and structure to users of the ASC X12 999 transaction set for Health Care Insurance.

This implementation guide is intended to enable a receiver of a functional group based on an X12 Implementation Guideline (TR3) related to Health Care Insurance business processes, to report the syntactical and relational analysis as specified by that implementation guideline (TR3), or to acknowledge receipt of an error-free transaction set.

This 999 is not limited to only Implementation Guide (IG) errors. It can report standard syntax errors, as well as IG errors.

This 999 implementation guide can NOT be used for any application level validations.

FORMAL INTERPRETATION

For a healthcare TR3 implementation, the 999 transaction must be used.

FURTHER DISCUSSION

Further guidance as to which transaction is to be used can be found in section 1.3.2 of TR3 005010X230 (997). This TR3 specifically states:

This 997 implementation guide can NOT be used for responding to any implementation guideline (TR3).

The front matter for the 5010 Healthcare TR3s was written prior to the development of the 5010 X12C TR3s for the acknowledgments. While the X12C TR3s were in development, the decision was made to reference their development. Per section 1.6, readers are informed as to the purpose of both the 997 and 999 transaction sets. The documents further states the implementation guides (TR3) were in development and intended to be used in conjunction with the TR3 containing section 1.6. Later guide authors such as guide 005010X279, gave specific guidance regarding which acknowledgment transaction to be implemented. The specific instructions are in alignment with 005010X230 (997) and 005010X231 (999) implementation guides (TR3). For further guidance concerning the implementation of acknowledgments can be found in the Technical Report Type 2 document named X12 Acknowledgement Reference Model (ARM). The ARM contains examples specific to healthcare acknowledgment implementations.

During the Errata process for TR3 005010X231, now TR3 005010X231A1, the following statements were added the document, further clarifying the position of the 997 and 999 for healthcare implementation.

“When acknowledging a healthcare implementation guide (TR3) based transaction, only a single transaction set 999 can be used. When acknowledging a healthcare implementation guide (TR3) based transaction, the transaction set 997 must not be used.”