HIPAA and X12
An Introduction
2 June 2008

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Intelligently Linking Information Systems

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HIPAA Nomenclature

Title II, Subtitle F -- Administrative Simplification of the Health Insurance Portability and Accountability Act of 1996 (HIPAA)  

a.k.a. Public Law 104-191  
a.k.a. H. R. 3103  
a.k.a. Kennedy-Kassebaum Bill  

which amends  
Part C of Title XI of the Social Security Act, and is codified starting at 42 U.S.C. §1320d
Administrative Simplification

• **National standards for efficient and electronic administrative and financial health care transactions**

Recommendations, and ultimately, regulations for privacy plus security

Recommendations for electronic medical records

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Applicability

• Health Plans
• Health Care Clearinghouses
• Providers

Individual States

Secretary of Health and Human Services

--- Added 12/15/2003 ---

Prescription Drug Card Sponsors
Applicability

• Health Plans -- including CMS’
  ° May not refuse to conduct a standard transaction
  ° May not delay, adversely impact, or attempt to adversely affect a standard transaction or a person using standard transaction
  ° Can require standard data elements within a standard transaction
  ° May use a clearinghouse as an intermediary to achieve compliance
Applicability

• Providers
  ° Compliance required by any “health care provider who transmits any health information in electronic form in connection with a transaction referred to” in the Act
  ° May use a clearinghouse as an intermediary to achieve compliance
Administrative Simplification

“Any standard adopted [by the Secretary of Health and Human Services] ... shall be consistent with the objective of reducing the administrative costs of providing and paying for health care.”

> Preference given to existing American National Standards Institute (ANSI) standards
ANSI Standards

• Accredited Standards Committee X12
  ° Washington Publishing Company (WPC)
  ° Data Interchange Standards Association (DISA)

National Council for Prescription Drug Programs (NCPDP)

Health Level Seven (HL7)
Administrative Simplification

Cooperative/Consultative Rule Making Process

**Designated Standards Maintenance Organizations (DSMO)**

<table>
<thead>
<tr>
<th>SSO’s</th>
<th>DCC’s</th>
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<tbody>
<tr>
<td>X12</td>
<td>NUCC</td>
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<td>NUBC</td>
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<td>DeCC</td>
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</table>

Department of Health and Human Services
[includes CMS/OESS and NCVHS]

Workgroup for EDI (WEDI)
HIPAA Transactions Specifications

- Mandatory Federal Regulations [“Rules”]
  which “adopt” and promulgate

- Voluntarily published X12 (and equivalent) Type 3 Technical Reports (TR3’s)
  a.k.a. “HIPAA Standards”
  which define precise uses of

- Voluntarily published X12 Standards

Note: X12 Type 3 Technical Reports are also known as Implementation Guides (IG’s)
## HIPAA – X12 Vocabulary

<table>
<thead>
<tr>
<th>Common Term</th>
<th>HIPAA Term</th>
<th>X12 Term</th>
<th>examples</th>
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## HIPAA – X12 Vocabulary

### Danger Zones

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<th>X12 Term</th>
<th>examples</th>
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<tr>
<td>X12 Standard</td>
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<td>Transaction Set Standard</td>
<td>834 270/271</td>
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</table>

Also note that IG/TR3 identification numbers and Transaction Set numbers are now overlapping; e.g., 005050X274, 005050X275, and 005050X278 for transaction set 275.
HIPAA Transactions

Function, sender, and receiver are all significant.

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## HIPAA - X12 Cross Reference

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Xnnn +A1 are adopted for HIPAA
Other Relevant X12N Groups

• X12N / TG4 – Implementation Guides

• X12N / TG2 / WG21 –
  HIPAA Implementation & Coordination
  ° Working Meetings
  ° HIPAA Informational Forum:
    Wednesday, 3:30-5:00 p.m. [see next slide]

⊕ X12 HIPAA Implementation Guide Request for Interpretation (HIR) Web Site
  www.x12n.org/portal
June, 2008

HIPAA Informational Forum

NPRM for Version 005010 TR3’s

• X12N’s NPRM Technical Comment Review Process –
  ◦ Overview and discussion of current draft
  ◦ Update on most recent meeting between X12 and OESS

NPRM: Notice of Proposed Rule Making
OESS: CMS’ Office of E-Health Standards and Services
Additional Available Classes

Presented by Pre-Arrangement

• “X12N’s HIPAA Transactions – Putting In Your Oar”
  how to participate in X12N’s HIPAA TR3 development

• “So You Want to Make a Change – Changing X12 Materials”
  the processes for X12N’s Standards, Codes, and TR3’s

• “HIPAA Transactions – The Next Generations”
  how to track all HIPAA transactions development and adoption activities, current status, and predictions

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HIPAA Further Information

DHHS  http://aspe.hhs.gov/admnsimp
X12N  www.x12.org  &  www.wpc-edi.com/hipaa
NCPDP  www.ncpdp.org
HL7  www.hl7.org  {Attachments Special Interest Group}
DSMO  www.hipaa-dsmo.org
LOINC  www.loinc.org
NCVHS  www.ncvhs.hhs.gov
glossary  www.wedi.org/public/articles/hipaa_glossary.pdf

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ASK ME QUESTIONS