Navigating the Transparency in Coverage Final Rule

[ Captioner Standing by ]

 Good afternoon ladies and gentlemen and welcome to the transparency and coverage webinar. We will begin shortly. Good afternoon ladies and gentlemen and welcome to the transparent and coverage webinar. Before we begin, I have a few announcements. If you are the member of the press, you may listen in, but please refrain from asking questions during the webinar. Members of the press can email press at CMS.tran04. For those that need close captioning, those in the link are in the chat function in the webinar. I will now turn the call over to Elise Stines in the consumer support group.

 Thank you. On behalf, thank you for attending our second webinar of the transparency coverage final [ Inaudible ] we are happy to have you back. The goal of their webinars is to drive the development to a finalized version, version 1.0, CMS recognizes the representation of information required from the transparency coverage pool can differ from plan to plan and implementations can made various challenges and concerns or how to represent information in unique situations. We hope to iterate on the development of information format or schema of the required data elements for optimized and consistent bio structure. We will be answering questions related to today's presentation at the end of the webinar. You may ask a question by typing that into the question and answer function at the bottom of the screen. We will do our best to get as many questions as we can today. Folks not able to join the webinar, we will post this to our transparency and coverage page. The webpage is located in the chat box. This call is being recorded, so the recording and a transcript will both be posted to the transparency and coverage website. Before we dive into , I went to remind them the guidance on August 20th, the enforcement of machine-readable fireable [ Inaudible ] the added network and build charges bio by six months. Issuers and plans are required to make available to the public those machine-readable files starting July 1st 2022. The departments of deferred enforcement of the requirement to publish machine-readable files related to prescription drug prices [ Inaudible ] a link to guidance is available on the ithub site and the societal website. I will turn this over to CMS technical advisor Scott Hazelton to delve what is happening on github .

 Thank you, Elissa Dines. My name is Scott Haselton and I have been hinting at the interaction and the development of the transparency and schema requirements found in github. You may have already seen me around there. I changed my avatar to the CMS logo to help those recognize a CMS response versus otherwise. For the agenda for today's webinar is to first recap what was covered on the previous webinar and the first webinar and to cover changes that have happened from the first webinar until now, talk about some of the change management process and what that entails, and ultimately try to get to some of your questions before we run out of time. It is pretty tight and packed. Moving to the recap of the first webinar, we covered high-level overview of github , what github and how github is used and how that is leveraged for development, the collaborative process that it involves and ultimately where the schema lives on github on CMS is github and how you can access that and either participate or view some of the discussions going on. There are no sign-ups necessary to absorb development. If you wish to discuss or be a part of conversations, you will have to sign up but sign-up is free, and fairly straightforward and easy. We also covered discussions around the various use cases that are driving some of the iterative changes that are resulting in these webinars. As an example previously we touched on some file size concern issues such as the service code changed from a string to an array, reporting of multiple plants per file. Some of these discussions we chatted about, some of them are more universal cases while there are some that are one off specific, and we would encourage you, if you want to participate, to go and dive into some of these discussions that might be relevant to you and your organization. Next, we covered versioning and how versioning works while the development was ongoing, and software is never done, but there needs to be a line in the sand in which the schema reaches 1.0 in which compliance will be measured against. Just because that reaches a 1.0 does not mean development can stop. There can be a version 1.2 after March 1st, but compliance responsibility will only be for version 1.0. Some benefits in developing 1.0 is there could be optimizations that are identified and that would benefit the organization and implementing, so keeping an eye on an process will be important. On the other end, if we find the schema, through these discussions, is stabilizing prior to March 1st, there is a real possibility that the finalized 1.0 can happen before March 1st. We covered the process of tagging the code in schema to a version so that producers of the file have an understanding on what the expectations are of the actual file. Version 0.5 might have some of the service code updates we talked about and version 0.6 has the ability to have multiple plans per file. We covered the version with schema and to expect when those start to increase. We cover what they actually mean. We finally talked about the communication loop of github and the transparency and coverage website and these webinars. We recommend if you want to be most up to date with the development of discussions and development of the schema, github is the place to go and that will be the most real time. With that said, we recognized some might not be use of that style interaction. The transparency and coverage website covers common topics, usually with links to a github discussion where you can see a more verbose insight into the topic. These webinars are to tie those two pieces of the website and github together . We talk about some of the recent updates and let questions that potentially drive some future webinar content. We use that to signal work and updates that potentially could be coming down the pike. With that in mind, I think that would be a good time to talk through the updates to the schema since the last webinar. If you remember, we have the github page in which all of the developed and happening. Going over these updates, we are assuming there is technical familiarity already in the schema that will help have a greater understanding of some of these technical updates, and give you greater insight into what changed and with the expectation and what those expectations are. The easiest way to track changes over time, and we covered this last webinar was the process of tagging. If I click on tagging, the most recent version we are in the most current version is 0.5.3 and we can compare all of the changes that were made to the repository from now until the previous webinar, so I will do the previous webinar plan that version 0.3.2-if we were to look through this, we can see a timeline and description of the changes that were made, and we will cover some of these changes to make sure no one missed anything. The first change we want to talk about is this concept of provider groups. I will click, all of these are linkable, I will click this change. The idea is originally we see red and green, and all that means is the information take it out of the file and the information put into the file. Originally we had this concept of providers, multiple providers being too a single 10 and that grouping would be tied to a negotiated price for a specific service. Through some of the feedback we received, it was clear that it was not just a single grouping of providers and 10 numbers that were associated with the negotiated price. With that, we made the change to allow for multiple provider groups to associate to a specific negotiated rate. This is important because this cuts down on duplicate of negotiate if prices, and ultimately addresses the ongoing issues of how large these files can be. Next, we looked into facility versus non-facility negotiated rates. The issue here was a combination of things. We have service code which is great and tells you the place of service for whatever item of service takes place, but they are really only tied to a facility versus non-facility and tied to a facility type claim. The terminology of facility versus non-facility is it is fairly ambiguous and somewhat overloaded as well. The concept of service codes are tied to confessional claims versus non-facility or institutional negotiated rates or claims. The naming was important with capturing that and standardizing that and introducing some of these changes. The relationship of professional claims and service codes are required between each other whereas in additional claims themselves do not necessarily have that direct concept of a service code. There is this coding system that is leveraged for institutional claims, but the type of bill is not represented in the current schema. The impact here was wanting to provide specificity and contextual specificity on some of these service codes. For negotiated rates and prices that are not professional and are institutional, so we want to for that representation. Bringing this to the group are bringing this to the community, happening through this particular comment, and there was a change made and proposed and we had the concept using the names of non-facility or facility in this contextual attribute to flag the claim itself, but it was raised in this particular comment with an actual link to a github commit talking about the potential changes that would be introduced and trying to solicit feedback from the community on whether this made sense and if this would fit their use case or if these attributes make sense but maybe not within the location that they are currently proposed. Through that, just walking through the discussion and you can see we had pretty great feedback on this actual proposal. Talking through the solution, that is where we landed on changing non-facility to be institutional and professional to allow for more standard naming, getting away from those loaded or ambiguous terms. Ultimately this change itself will be incorporated and it is called merging, and we will talk about pole requests later on. This was a great way to allow for the claiming or the flagging of certain negotiated rates for claims that may not fit in the professional status that have service codes that are institutional. Next issue that we updated was talking about when providers themselves [ Inaudible ] in the actual schema itself will change the facility or none facility to be institutional. Later on, we have logic that we have the building class professional and we will require the service code which means ultimately the service code is optional until the billing class itself is flagged as professional. Next, we address a common important concern about privacy information and personally identifiable information that is private is what happens when you have a provider that is using their Social Security number as their tax identification number. We did not want those for security numbers to be provided in these files because that is protected PII. Do that and talking through the solution, we came up with this concept of continuing to use the 10, but there are some concepts of an EI and employer, or an MPI. Reporting on this will not be under the EI and which is technically true because the EI and has this number format and the does not have that number format. The 10 itself moved from a straight string to removing an object and we have two attributes of that. The first is called type and the second is called the value. The type will either be EI and which is what 10 was before and you will put the value of the EI and in the value attribute. The other type, we have MPI. This is where you have a provider supporting their Social Security number or using their Social Security number as their tax identification number instead of putting their SS and into these machine-readable files, we will have that file represented as an MPI, and this is interesting itself, and here is the formal change within the schema, we have the enumeration of [ Inaudible ] of this new object and both of them will be required and ultimately that new object and that new MPI will be required as well. This came about for discussions. The reason we decided on the MPI was a while flagging this and a real issue in this important issue, the community came up with proposed changes and great ideas whether they all have a static number or we just leave it empty but the real reason we landed on using the MPI once it is important to have that combination of the providers MPI in the tax identifiable number to form something called a composite key which uniquely identifies the provider, the place of business for the actual negotiated rate for that item in service, there were interesting suggestions and people cause an pseudo-masking Social Security number, and while this was raised just like the facility and non-facility example, we provided a potential path forward with some examples of what that might look like and ultimately got feedback from the community on whether that would work or not and incorporated those changes and merged them. Lastly what has changed from the previous webinar until now is our testing suite which I want to quickly run through with you here. Nothing really changing on the schema side but more of a way to have greater confidence in the changes that are made, and ultimately pushed into a github to be verifiable and correct, and when changes are introduced, there is not any downstream impact or if there is downstream impact, what does that look like in terms of updating or getting those caught as fast as possible. I had my command line open here and this is a group project for repository and if I were to list anything out, we can have the resources folder in the schema and resources test. This is the main repository and if you have the repository and if you go into a folder called tests, and here, we are leveraging testing framework, which is in the community and to give you an idea of what these tests and look like, what they are really testing now is a couple things. First thing we are testing as we are grabbing the actual legitimate schema, so this is a document where that location is and we are checking to see that is a valid case on schema in and of itself. Secondary, we are checking and grabbing the examples that we have. In this case, we have fee for service example and pressing that example, and we will validate that against the in network schema to make sure the example is conforming to the schema and self, and we can give greater confidence to those using the example as their building template versus the actual schema as their building template. Pretty exciting to run the tests, want to give an idea of what the output might look like. We have six tests and we can see what tests have been ran. We are first checking to see if this has schema and we go through the different examples to see if those examples are valid against our defined schema itself. We do that with the networks. To give an idea of how this will be, they catch us if we were to go to the examples that we have been testing, and this is an example file that we have right here. That is common for fee service and am looking at the same exact file or in then. Those recent updates, there were only two values aloud and we were allowing the MPI and we were allowing the EI and. If we were to make a change to Social Security number as the type and save that and try to run these tests again, we will run into an error. This is nice in terms of checking our examples to make sure they validate against the schema itself. It will be pretty specific like the SS and is not a member of the NPI or needs to be one of these two. Nice to have that double checking, so just changing this back to you, and running the tests again and we have valid tests. Lastly, we have tied this into something called github actions which means that while the tests I just ran that you saw our room locally on my machine, we want to make sure my environment is unique or specific to how I have set that up and we will run these tests in a different environment that is agnostic if you will. Every time that code is checked in, that triggers a process called github actions to run those tests all over on the github site to make sure the code checked in is very, it is not error-prone and ultimately we will merge codes into a master branch. Another set of github actions are ran and the tests are ran, and that gives you greater confidence. With that said, you can use the testing suite to start to look at some of your examples and test that against the schema you find in this repository. I would caution the current testing suite is meant to look at the examples, like smaller examples if you are trying or have expectations of loading a fairly large file or an output file and testing that against the schema itself. We have not tested for that, so I would not hold my breath on having good expectations. With that said, we are starting to look into various parts that we can provide the community that will allow for these cases. As far as updates from the previous webinar, we have started to work pretty closely into this concept called reference files, and while nothing has been updated yet, I went to signal to the community that this is important to us and figuring this out, and we are starting to look into providing optional avenues and have additional files that hold a huge number of provider networks or displayed in the file can be redundant and allowing for the reference to avoid some of that redundancy, expect something coming down the pike very soon that should be a big help in terms of some of these larger files cites concerns. Lastly with that, it is having the initial schema itself where everything laid out is somewhat of a normalized database so that representation information and redundancy is a difficult problem to solve. By looking into reference files, we were somewhat almost going through the process of normalization of what one should do with the database. The hope is to significantly cut down on some of those file sized issues. That is it for the updates that we made from the previous webinar until now, lots of nice progress with some exciting things coming down the pike to expect for the next webinar. I want to spend a little bit of time now going over how changes are introduced into the schema it self. Using the Social Security number as a example for the change process as we saw in a discussion, if you're ever looking for is the discussion, discussions, there are quite a few of them that have popped up since the last webinar, you can start to use this next up here that brings out results over here. How does change process actually work for us with iterations that need to happen, this was a great example, Social Security number is definitely a real thing that providers still use their Social Security number as their tax identifier, and we need to solve for that. What typically happens when a change needs to be introduced is that will be flagged, the use case will be flagged in the community where they will go through the normal development process and they will run into an issue. In this case, having a recommendation is fantastic and that gets the conversation started. Proposals are made in the community continues to iterate through this and other solutions. If that is a large change versus a small change, what would typically happen is there is back and forth on this one but what would happen is CMS will come with a proposal or idea or structure of a proposal and put that out to the community to see if it works or if it makes sense or if there are any blind spots that might be identified or D, if there is unintended consequences to the actual proposed solution. In this case, we talked through this solution and the reason why we did not go through a solution where that was all zeros or that was a generic answer or an empty answer, or somewhat masked answer is we need that identification and that composite key if you will that identifies a provider to the business that they work for. In this case, the business that they were for is themselves, it is their Social Security number is the assumption. We need to capture that information so using that key, we know specifically that they are part of a negotiated rate for an item or service. Through smaller and larger changes and how that process might differ, it is best to go through something, I have an example here, through a branch and if that is a larger change, in this case, we have three branches and we have a master branch or billing class branch, and we have a reference file branch so you can see development happening right of the main branch that could be signals of things to come and are interesting for discussion as well. If larger changes are introduced, a branch will be created, and we did not cover this on the first webinar mainly because we were doing high-level or did not really get overview, but just to help out those that do not know what a branch is quickly, this wine signifies development happening and these bubbles signify changes in development so there is a change here and we change here. Using billing class is the branch that we have here and we will talk about that. That billing class branch was the branch that introduced the concept of professional during institutional negotiations. We don't want to stop any type of development happening on this main branch, but we want to make-once we feel good about those changes, merge that back into the main process but the main process would look like this up unto this part of development, we want to start looking into the billing class information so we will create another branch that allows for development to happen outside of the main branch. This is where the community will happen in these two branches, this is not the feature, but the one we are looking at, that would be willing class and that reiteration can happen almost independently versus what is happening here and once we field. About the changes that have been made in the billing class, we push that back or the verb is called merging this back into the master branch, and that merge happens through a process called a poll request, and you can find poll requests and actions and discussions up on this secondary menu. If we see request here, I opened up this poll request billing class last night. What happens is you can get a comment on what is being merged back into the main branch, and all of the changes that have happened. Others can comment if they have further questions or finding mistakes, but that allows for the community to continue to be involved before these changes merged into the main branch. Once the branch is merged, this billing branch or billing class branch will be typically overdue. You can see this poll request goes over the different comments that have been made, it has the tests that have been ran, which is great, and that goes over all files that have been changed as well. You can see the version that would get bumped. We are adding a class called professional and you can be at the real-time changes by looking at some of these poll request which. Once a poll request is merged in, the question of who gets notified, if you are watching, and recovered his last webinar, if you were watching at all activity, you will get notified and you will get an email. Not to fall behind on any larger features or mergers that happen into the main branch. If you are interested, if you are doing the development, you want to watch the overall activity that can generate quite a bit of email traffic. Having a filter set up will be your friend. I want to also talk about what other possible changes and not updates or changes that can happen. In this case, we saw quite a few from the previous webinar and we walked through changes such as adding an attribute that is required and that attribute, in this case, was a class, and we will continue to that if that helps contextualize the required information found in the rule, adding attributes that are optional and removing required attributes and removing optional attributes and those probably will not happen as much, and when attributes need to be changed from required to optional, we saw that with the service code itself. The service code was required up until this billing class change in the service code became a conditional requirement for the billing class being professional. We can see that here and this is the formal schema and we can see that. That is only required if the billing class is professional. Those are those of being required in moving to optional. One of the more common changes that you will encounter will be when attributes need to be moved or reformatted so there is no real information per se, it makes sense either through full-sized concern or a logical concern to move attributes around. We have seen that in the past few months. That one is probably a change and will be the most common. I want to flag even though these are small iterative changes and relatively small iterative changes that are still used to address larger buckets such as size and reference based pricing, which we would get to in the future webinar, you can and should get started developing right now. The data requirements from the rule are fairly static and they have been for almost a year. The arrangement and the grouping of those elements is typically where we will see most of the changes, and as a final thought on the change process is and getting started through some of the china discussions, it has become quite clear that many organizations have been in development for a while and are well underway and prepared to miss the March 1st deadline, so there is nothing stopping you, at the minimum, to identify some of the data requirements from the rule and how your organization plans to access those data requirements. I would recommend to get going now. Before moving on, I want to get a poll on the topics of interest for next webinar. We did this last webinar, good feedback, and we used that feedback. We had the first two webinars planned in terms of content and we are starting to use the discussions in these polls to really drive some of that next content we will be seeing in the webinars. I will try to throw this up, the questions we are asking is where you are within your actual development and not new content. Does not look like anybody is answering. Here we go. I will let this run for another minute. Okay thank you for that. Looks like the vast majority start to test files, which is great. For those that have not started, looks like the majority of that is they are waiting for the requirement to finalize and I will reiterate that you can get started now. The data elements that will be required have not changed or not changed the finalization requirements you see in the iterations on github are much smaller iterations on some of the larger data requirements that are in place. I would encourage you to get started because there will be work if you wait until the very end. Great, Elissa Dines, Landis over to you and go through the questions we received.

 Thank you, Scott. Before we moved to questions, just to repeat, we are putting what we are calling technical verifications on the coverage website. Every week or so that is. Be sure to keep up on new questions and answers. These are clarifications that come from discussions and responses on github , questions and answers from these calls, and in some cases, questions from specific stakeholders. In addition to the discussions and responses on github, we have extracted clarifications that have occurred through the last webinar. Definitely check those out. Give me a few more moments here to check out the questions. We got quite a few. Scott, Landis over to you but feel free to take more time. I know there is a lot going on in the Q&A .

 Lots of questions around the Social Security number, is there an option that [ Inaudible ] or have a capable to identify the providers 10? Masked in the sense that they would provide their Social Security number, no. If you are able to identify the provider to the NPI, you have the information you need to report and you will not use your Social Security number. No. We will not be masking. If the schema is not mandated, does that mean we have to choose Chaisson as machine-readable format, are we expected to strictly align with the schema on github ? The schema itself is mandatory. We talked about the format and the actual file format requirements are pretty broad in the preamble of the rule, we talked about two things that drive web file format that can be used, the first one is it's nonproprietary format. You cannot use something like a PDF or Excel. The reason behind that is because formats are close. We do not want to be requiring specific software or purchasing of software to be able to read the formats, we do not want to have barrier to entry and tilt, you told me what is not required and what is required? The definition is open standard format, and there are a bunch of those out there. It is up to your organization that most makes sense to you to produce these files, and we recognize there are an incredible amount of legacy systems and new systems and different technologies out there, and adhering to a single format might work for some but will not work for others. With that said, we are providing that and JSON and eczema is lagging a little bit but we started providing examples for that as well. The schema is rules and how information is represented. If you want to use a format and there have been questions around can we use parquet from Apache, you can. You just need to do the mapping of what is in the JSON schema , that mapping format to whatever format you wish to actually use or whatever needs to make the most sense to your organization. Is it possible for a provider not to have a NPI and to use your social security number? No. I would say a provider needs a NPI in order to be HIPAA compliant. That is pretty much everyone, if you will be practicing, and the United States, you will have a NPI. How do we access this testing space? The testing suite is already in the repo. I will add documentation for those that want to run the tests locally, but quickly, you will need will be install and it is called one gem install and that is bundler and you would install that and you would download the repo. From the repo itself, we have this concept of a gym file, and this signifies what packages are necessary to run the testing suite. You would run bundler and bundler will look for this gym file and install all of the necessary dependencies and you would go into actual tests and run some of the commands that I ran. This recording is saved. If you had questions on the specific commands I was running, you can look at that. Looks like questions around service code required for institutions, no. We covered this a couple minutes ago but the service codes are required for professional negotiations, not in. This is a pretty common one and this one is interesting because it assumes some level of knowledge of the current software development maturity team, so how do we protect ourselves against excessive egress from actors, and the idea is there are large files, and there are costs associated with those files, so how do we minimize that or at least not get brought down through network bandwidth or costs, and this one is hard to answer because every organization is a little bit different. There are ways out there, if that makes sense to organization to leverage, these are static files. Using a CDN or content delivery network makes sense. There is a bunch of them, there is cloud front [ Inaudible ] putting this information to CDN and since these files will be refreshed every 30 days, you can really have that cash on the file that will be pretty long. If you have multiple actors are the same actor hitting that multiple times, the cash will be hit, and not trigger another egress download. Yeah file naming. We introduced the idea of allowing multiple plans to be reported to a single file in the name of file size, in this case, it was not necessarily file size but the amount of files being produced and the size of the files when you had them altogether can be quite enormous. Made sense from an organization standpoint to include all of these files that had the same negotiated rates together but that introduced file naming contention issues that we had initially set up for single file-the long and short of it is we have not quite figured this out and we are working on it and we are seeing a lot of good input from the community. There have been solutions or suggestions of solutions around using something called a table of contents file that basically would be a small file identifying all of the contents that are in these larger files, and that makes sense, we are not quite sure if that is particularly the way to go, so we are still working on this one. This one is front of mind, and we will continue to not only work through this ourselves on our end but help we can come up to a solution that makes sense. Do we allow access to these files from a foreign country? [ Laughter ] I think that's all the time we have for questions today and previously, we do collect these questions and that does drive content for the future webinars and ultimately it allows us to see if there are any iterations that happen or continue to happen on the schema until we reach March 1st deadline. With that said, I will pass this back to Elissa Dines .

 Thank you, Scott. As Scott said, we received a number of questions and we ran out of time today and we cannot answer all of them but we are taking them back and we will consider them and grow Q&A up on the TIN website with any websites we are able to come to between now and the next call. Again, thank you all for your thoughtful questions. We are planning for our next webinar to be toward the end of this month, and we will be focused on file size issues. Please remember to register on the github websites or through your email invitation, which should be going out in the next few days. Thank you to everyone, and take care.

 [ Event Concluded ]