ASSETT also receives complaints that are not enforceable by HIPAA Administrative Simplification Rules. These are labeled “Invalid” within our system. Typical examples of invalid complaints could be Quality of Care or Quality of Service complaints. The National Standards Group (NSG) either works with the complainant to locate the appropriate agency to file their complaint or mediates between them and the filed against entity to achieve a resolution.

Open – As of the reporting period, this number represents complaints in active status, e.g., outstanding issues remain, additional information is being sought from either the complainant, the filed against entity, or both.

Closed – All issues have been sufficiently resolved.

Corrective Action Plan (CAP) – The written corrective action plan indicates alternative solutions with specific steps to correct the issue(s) within a time limit. Each affected entity under a corrective action plan is in the process of supporting or refuting allegations and/or implementing system updates.
FAE Deemed Compliant – FAE found not to have violated HIPAA Administrative Simplification rules.

Resolved by Mediation – The complaint parties resolved the issue on their own or NSG served as an intermediary to resolve the issue.

Executed Corrective Action Plan (CAP) – FAE completed all systematic updates to resolve the issue.

Retracted – The complainant withdrew the complaint, e.g., decided not to file or resolved the issue with the FAE, without assistance from NSG.

After receiving a complaint in ASETT, it passes through several stages during the complaint lifecycle. Immediately, it is triaged and categorized as to which HIPAA regulation was violated in the course of conducting business. After first contact with the entities involved, the complaint will pass through each Processing Phase until an agreement between the entities and compliance with HIPAA Administrative Simplification Rules is reached. The phases are:

- **Initial Review** – Complaint undergoes initial triage and validation, and the entities are notified a new complaint is underway. The filed against entity (FAE) is given 30 days to provide their response.
- **Analysis and Investigation** – The response from the FAE is reviewed and NSG facilitates communication between the complainant and the FAE. This phase includes policy review, review of the Healthcare EDI Guides (TR3 documents) from X12, etc.
- **Pending Closure** – The complainant verifies that their complaint can be closed after the FAE resolved the HIPAA violation. The agreement to close may involve collaborative testing by the complainant and FAE. NSG sends formal notification of the complaint closure to the entities involved.

The number of Days in Phase is not calculated until the phase is closed.