

## July 21, 2023, Submitter Forum \*

ATTENDEES	
<ul style="list-style-type: none"> <li>• Lee Spangler, Executive Director</li> </ul>	<ul style="list-style-type: none"> <li>• Devin York, Senior Project Manager</li> </ul>
<ul style="list-style-type: none"> <li>• Joseph Harrison, Data Process Manager</li> </ul>	<ul style="list-style-type: none"> <li>• Jodie Nassar, Data Operations Manager</li> </ul>

AGENDA
<ul style="list-style-type: none"> <li>• 2023 Submission Calendar</li> <li>• Adjudicated Claims</li> <li>• Submission Priority</li> <li>• Stage 2 Data Quality Checks</li> <li>• Expected Data</li> <li>• TACC Acceptable Use Policy (AUP)</li> <li>• Testing – Ongoing</li> <li>• Q&amp;A</li> </ul>

### DISCUSSION TOPICS – Q&A

#### General

#### 1. General comments from the Center:

*The Center thanks everyone for participating in this submitter forum. The answers provided here are our best understanding of the questions submitted. As always, something may get lost in translation. If there needs to be further clarification on any question, please submit a ticket and we can start that dialogue.*

***Some questions may have been repeated from the last Q&A as they are still pertinent.***

#### Notifications

*As stated in the submitter forum, the TX-APCD will begin accepting monthly submissions on July 1, 2023, for March 2023 adjudicated data. Historical submissions will be accepted from August 1, 2023 –*

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\* Some questions submitted have been edited for clarity.

December 31, 2023, to include data from January 2019 – February 2023 (assumes you begin monthly submission in July 2023).

Notifications may be found on our website at: <https://go.uth.edu/txapcd> (TX-APCD Payor Registration and Information Menu)

### **Common Data Layout**

- 2. Our organization has questions on certain fields that are required for submission. Is there an opportunity to connect with TX APCD support to go over the questions we have?**

*Yes, please submit a ticket at [txapcd.org](http://txapcd.org) detailing your questions (please be as detailed as possible). Logging a ticket helps us to build our knowledge base as well as to be efficient in answering your question (some questions require research). If questions remain after our initial response, we are happy to setup a meeting to discuss any remaining items.*

### **Extensions and Exceptions**

- 3. Based on the provided submission notification, when is the deadline to submit an extension?**

*According to TDI regulations, a required submitter may submit a “request for an extension to the Center before the reporting due date...” and is otherwise silent on timing, unlike exception requests. However, required submitters should note the Center is permitted at least 14 calendar days to consider an extension request (with additional time should the Center request additional information). The 14-day minimum time-period should be considered when deciding upon the timing for extension requests.*

- 4. After testing, we find that we need to submit an exception request for some items. I see there is a form on the portal. What is the process/timing to submit that request.**

*According to the rule, a payor may request a temporary exception from one or more requirements by “...submitting a request to the Center **no less than 30 calendar days before** the date the payor is otherwise required to comply with the requirement.”. The Center is permitted 14 calendar days to consider the request.*

- 5. Does the one-year extension start from when it goes live or another date?**

*Extensions and exceptions are typically granted based on calendar year and expires December 31<sup>st</sup> in the year in which it was granted.*

- 6. Our test files failed because some fields didn’t meet the minimum thresholds. If we file an exception, we shouldn’t fail next time?**

Yes, exception requests are available for submitters who cannot meet the requirements for a particular field in the CDL. Please complete the Exception Request Form and Exception Threshold Spreadsheet. Please send both forms to [txapcd@uth.tmc.edu](mailto:txapcd@uth.tmc.edu). As a reminder, exception and extension requests require approval from the TX-APCD.

### **File Submission**

**7. If we have our April files ready for submission prior to August 1, 2023, may we submit them prior to the August 1<sup>st</sup> date? My question would apply to all months going forward. Do we have to wait until the first day of the month or can we submit anytime we have the files ready?**

*The rule has a 90-day delay between the last day of the reporting period year-month and the 1<sup>st</sup> day of the submission window. From the rule:*

#### **§21.5404 Data Submission Requirements.**

*(h) Payors must include data in medical, pharmacy, and dental claims data files for a given reporting period **based on the date the claim is adjudicated, not the date of service associated with the claim.** For example, a service provided in March, but adjudicated in April, would be included in the April data report. Likewise, any claim adjustments must be included in the appropriate data file based on the date the adjustment was made and include a reference that links the original claim to all subsequent actions associated with that claim.*

*You may submit files early if the data files contain only adjudicated data and that any future submission does not result in lost or duplicated data.*

**8. Is there an expected turnaround time for stage 2 data inquiries?**

*The goal is to provide feedback by the end of the submission month, however, initially this process may take longer.*

**9. To clarify, Stage 2 Quality checks: does this mean that we could have files for a reporting period pass and then later, it could be changed to a failure?**

*Stage 2 is not about pass or fail, but about quality. This analysis can only occur after doing a deep dive across all received data at both an individual and collective level. As stated in the presentation, if any anomalies are found, the TX-APCD would begin a conversation and would only proceed with an agreed execution plan between all parties.*

**10. The Stage 2 checks and the unknown timing poses challenges to the submitter as we have development resource constraints and can't keep our resources "on hold" indefinitely. Will there be a schedule that will come out on these changes, and will there be adequate implementation time allocated to allow the ability for submitter to comply?**

*As stated in the presentation, any Stage 2 data-issue would begin a conversation between the submitter and the TX-APCD. Only once the problem is understood would all parties agree to an execution plan.*

**11. As the Stage 2 Quality checks are implemented are you going to expect the submitters to resubmit files, or will the checks and fixes be going forward only?**

*The goal with the Stage 2 checks is to ensure quality data for research. The TX-APCD cannot exclude any reporting period from resubmission if the quality is extremely poor. We can only determine any resolutions by first discussing the issue with the submitter. Only then, can we come up with a game plan together.*

**12. Can we continue to submit test files even after we have passed validation for all our payor codes?**

*Yes, we encourage submitters to test as many reporting periods as possible, especially the historical data-periods. Even after the start of monthly and historical submissions, submitters may submit test files. These configurations will be discussed at the June Submitter Forum.*

**13. We Can you confirm if the stage 2 quality check are identical between test submissions and live submissions. We were a bit surprised when our live file initially failed quality checks when it fully passed testing and was the same file from testing.**

*This question most likely pertains to Stage 1 checks. The TX-APCD implemented the final rules and thresholds for production go-live that caused a select few submissions to fail (these were easily corrected and passed on resubmission); these were generally rules that had been wide-open in testing. This is why we wanted to have a “soft” go-live with March data so we could work out the final configurations before accepting the large backlog of historical data. If your March file passed, you should have high expectations for your April data as the rules are now finalized.*

**14. Is one month of test data sufficient, or are we required to test a larger sample?**

*There are no test submission scenarios in the rule. The TX-APCD would like a test with at least 3 to 6 months of historical data, from the years specified in the rule; prefer at least two sequential months from the same year. The testing period is not only for the benefit of the submitters, but also so that the TX-APCD can validate its intake process.*

**Technical**

**15. Are there plans to be able to view the status of the files on the portal?**

*Yes, we an extensive roadmap for the portal at [txapcd.org](http://txapcd.org). We hope to include online registration, extension and exception requests, submission history, submission status, etc. If there are any features*

*you would like to see, please let us know and we may add them to a future roadmap release. Some of the initial pages are in testing and should be available by the end of 2023.*

**16. Is there an update of when we will be able to see more information in the portal? Also, is there work being done so that everybody under the same company ID can see all information included tickets from a different person?**

*The portal is currently under development and testing. Thank you for the feedback on ticket visibility across a group, we will investigate the feasibility and report back at a future submitter forum.*

### **Miscellaneous**

**17. Understood the TX-APCD is having funding issues, and this made us pause the project on our end till we hear back from the center. Can you confirm that the issue is resolved, and may we continued work on our end? Although we have our extension approved till Dec 31s, just want to know if funding issue is resolved from your end?**

*Despite support and recognition of the value of the TX-APCD through proposed legislation, the 88th regular legislative session of 2023 did not make state funding available for the TX-APCD. Without such funding, some of the TX-APCD services described in HB 2090, the original bill establishing the TX-APCD, that require additional personnel, operational expenses or capital investment are not achievable in the near term. Nonetheless, due to the establishment of the TX-APCD within the Center for Health Care Data, the ability of the TX-APCD to continue receive submitted claims data and safeguard that data is unchanged.*

*There is no interruption in the submission timelines and required submitters and payors should continue to contribute data as required by TDI regulations and the Insurance Code.*

**18. Can these webinars be moved to a different day of the week? Any weekday but Friday.**

*Thank you for this comment, we will send out a short survey to determine preference on day of week and frequency of the submitter forums.*

**19. Don't the regulations state that Medicare Supplement is optional?**

*Yes, please refer to 28 Texas Administrative Code §21.5401(b)(9) – permitting submission of Medicare Supplement Coverage if the payor elects to submit such data.*

**20. Are EPO plans exempt from the data submissions?**

*No, please refer to 28 Texas Administrative Code §21.5401(b) – applicability.*

**21. Can we get a copy of the slides?**

Yes, the slides will be posted at <https://go.uth.edu/txapcd> – TX-APCD Payor Registration and Information tab (scroll down to bottom of page under Additional Resources).

ACTION ITEMS
<ul style="list-style-type: none"><li>Send notification for August 2023 Submitter Forum.</li></ul>