

September 30, 2021

The Honorable Dr. Micky Tripathi  
National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C Street SW, 7th Floor  
Washington, D.C. 20201

Re: The CARIN Alliance's Submission to include Explanation of Benefits, Member, and Health Insurance Coverage in the U.S. Core Data for Interoperability, Version 3.

Dear Dr. Tripathi:

As you are aware, the CARIN Alliance is a multi-sector group of stakeholders representing numerous hospitals, thousands of physicians, and millions of consumers, individuals, and caregivers. We are committed to enabling consumers and their authorized caregivers easy access to their personal health information. Specifically, we are promoting the ability for consumers and their authorized caregivers to gain digital access to their health information via open APIs.

On behalf of the CARIN Alliance, we would like to thank you for the opportunity to submit new Data Classes and Data Elements in the U.S. Core Data for Interoperability, version 3. The CARIN Alliance is submitting two new Data Classes and proposing a modification to an existing Data Class (please see the Addendum for more information). These are derived from the [CARIN Implementation Guide for Blue Button®](#) Common Payer Consumer Data Set (CPCDS). The CPCDS is a logical data set (similar to ONC 2015 Edition Common Clinical Data Set) that meets CMS Blue Button 2.0 API content and defines key payer financial health data.

These new Data Classes and Elements include core administrative data that currently do not exist in the USCDI, but are necessary to further the ONC's mission of "a standardized set of health data classes and constituent data elements for nationwide, interoperable health information exchange." In addition and as you know, these data classes are required by CMS for July 1, 2021<sup>1</sup>. In fact, CMS Blue Button has adopted the CARIN IG for Blue Button for all Medicare FFS beneficiaries<sup>2</sup> and so have hundreds of other payers across the country. Adding the data elements associated with the CARIN IG for Blue Button to the USCDI will provide the much needed direction everyone in the health care ecosystem needs to include financial and administrative data in their technology roadmaps to support multi-sector interoperability. The submission of the new Data Class Explanation of Benefit Data Class include: medical claims, retail pharmacy claims, provider claims, claims amounts, claim line details, claim line amounts, diagnosis, and

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<sup>1</sup> <https://www.cms.gov/Regulations-and-Guidance/Guidance/Interoperability/index>

<sup>2</sup> <https://bluebutton.cms.gov/developers/>



procedures. The Member Data Class would expand the existing patient related information to include member ID, the date of death, and unique member ID, among others. Lastly, we propose modifying the Health Insurance Data Class to Health Insurance Coverage, which we believe more clearly explains the overall theme or use case of the supporting Data Elements. Additionally, we would expand the number of Elements to include coverage status, group name, plan identifier, plan name, and the relationship to the subscriber.

Thank you again for providing the opportunity to submit these Data Classes and Elements for consideration in USCDI v3 update. In submitting these Data Elements, we realize that there may be some overlap or duplication that could occur and would welcome input from ONC and the community. We would also appreciate suggestions to combine or rename the Data Elements that were submitted.

Again, we appreciate your consideration and if you have any questions or additional follow-up, please contact a member of our administrative team at [mark.roberts@leavittpartners.com](mailto:mark.roberts@leavittpartners.com) or [ryan.howells@leavittpartners.com](mailto:ryan.howells@leavittpartners.com).

Thank you for considering our recommendations.

Sincerely,

The CARIN Alliance

## Addendum

The CARIN Alliance is proposing two new Data Classes and proposing a modification to an existing Data Class. These new Data Classes and Elements include core administrative data that currently do not exist in the USCDI. The Data Classes and Elements that the CARIN Alliance is submitting can be found below.

### Submission 1: Explanation of Benefits

#### New Data Class: Explanation of Benefits

"The claim details; adjudication details from the processing of a Claim; and optionally account balance information, for informing the subscriber of the benefits provided."

HL7 Release 4

#### New Data Elements:

- Claim Service Start Date
- Claim Service End Date
- Claim Paid Date
- Claim Received Date
- Member Admission Date
- Member Discharge Date
- Payer Claim Unique Identifier
- Claim Adjusted from Identifier
- Claim Adjusted to Identifier
- Claim Diagnosis Related Group Version
- Claim Inpatient Source Admission Code
- Claim Inpatient Admission Type Code
- Claim Bill Facility Type Code
- Claim Service Classification Type Code
- Claim Frequency Code
- Claim Processing Status
- Claim Type
- Claim Sub Type
- Patient Discharge Status
- Claim Payment Denial
- Claim Other Payer Identifier(s)"
- Claim payer Name
- Claim Payee Type
- Claim Payee
- Claim Payment Status Code
- Claim Payer Identifier
- Statement From Date
- Statement Thru Date

Adjudication Date  
Total Amount  
Claim Identifier Type  
Procedure Code Type  
Adjudication Amount Type  
Days Supply  
RX Service Reference Number  
DAW Product Selection Code  
Refill Number  
Prescription Origin Code  
Plan Reported Brand-Generic Code  
Total Amount  
Claim Identifier Type  
Adjudication Amount Type  
Claim Billing Provider NPI  
Claim Billing Provider Contracting Status  
Claim Attending Physician NPI  
Claim Site of Service Network Status  
Claim Referring Physician NPI  
Claim Referring Physician Network Status  
Claim Performing Provider NPI  
Claim Performing Provider Network Status  
Claim Prescribing Provider NPI  
Claim Prescriber Contracting Status  
Claim PCP NPI  
Service Facility NPI  
Care Team Role  
Claim Attending Physician Name  
Claim Billing Provider Name  
Claim Performing Provider Name  
Claim PCP name  
Service Facility Name  
Claim Referring Physician Name  
Claim Prescribing Physician Name  
Claim Supervising Physician NPI  
Claim Supervising Physician Name  
Service Facility Address  
Claim Operating Surgeon Name  
Claim Operating NPI  
Practitioner Identifier Type  
Organization Identifier Type  
Claim Total Submitted Amount

Claim Total Allowed Amount  
Amount Paid by Patient  
Claim Amount Paid to Provider  
Member Reimbursement  
Claim Payment Amount  
Claim Non-covered Amount  
Member Paid Deductible  
Co-insurance Liability Amount  
Copay Amount  
Member Liability  
Claim Other Payer Paid Amount  
Claim Discount Amount  
Service (from) Date  
Line Number  
Service to Date  
Type of Service  
Place of Service Code  
Revenue Center Code  
Allowed Number of Units  
National Drug Code  
Compound Code  
Quantity Dispensed  
Quantity Qualifier Code  
Benefit Payment Status  
Line Payment Denial Code  
Payment member explanation  
Line Noncovered Amount  
Line Member Reimbursement  
Line Payment Amount  
Line Discount Amount  
Line Amount Paid by Patient  
Drug Cost  
Line Allowed Amount  
Line Amount Paid to Provider  
Line Patient Deductible  
Line Other Payer Paid Amount  
Line Coinsurance Amount  
Line Submitted Amount  
Line Allowed Amount  
Line Member Liability  
Line Copay Amount  
Diagnosis Code

Is E code  
Present on Admission  
Diagnosis Code Type  
Diagnosis Type  
Procedure Code  
Procedure Date  
Procedure Code Type  
Procedure Type  
Modifier Code -1  
Modifier Code -2  
Modifier Code -3  
Modifier Code -4

## **Submission 2: Member**

New Data Class: Member

“Demographics and other administrative information about an individual receiving care or other health-related services.” HL7 Release 4

New Data Elements:

Member ID  
Date of Birth  
Date of Death  
Deceased Flag  
Zip Code  
County  
State  
Country  
Race Code  
Ethnicity  
Birth Sex  
Name  
Gender Code  
Patient Identifier Type  
Unique Member ID  
City  
Member Address Begin / End Dates

### Submission 3: Health Insurance Coverage

New Data Class: Health Insurance Coverage

“Provides the high-level identifiers and descriptors of a specific insurance plan for a specific individual.” HL7 Release 4

New Data Elements:

Coverage Status

Group Name

Plan Identifier

Plan Name

Relationship to Subscriber