SENDING 997 & 999 ACKNOWLEDGMENTS RFI 2010-04. June 2010

REQUEST

The WEDI Acknowledgements Subworkgroup is requesting ASC X12 to provide a formal interpretation regarding whether a 997 and 999 can respond to the same functional group when implementing the acknowledgments for a healthcare implementation.

From the 5010 Standard - the transaction set notes for both the 997 and 999 contain the following note:

1/0100 Only one acknowledgement, either a single Transaction Set 997 or a single Transaction Set 999, should be generated for a functional group unless mutually agreed upon.

In the acknowledgments TR3 005010X230 the following is stated in section 1.1 Implementation Purpose and Scope:

When implementing this TR3 in conjunction with the 999 transaction set, this 997 implementation guide can NOT be used for responding to any implementation guideline (TR3).

In the acknowledgements TR3 005010X231 (999) there is no guidance in section 1.1 on whether both the 997 and 999 are able to be used to acknowledge the same functional group. However, the transaction set note states the same as the standard listed above.

It is requested X12 clarifies the position concerning whether or not both the 997 and 999 may be sent when acknowledging the same 5010 functional group for a healthcare implementation. In addition, can a 997 be legitimately used to acknowledge a TR3?

REFERENCED X12 STANDARDS

The following X12 Standards were reviewed in developing this interpretation:

X12.1 Transaction Sets

997 - Functional Acknowledgment Purpose and Scope:

This X12 Transaction Set contains the format and establishes the data contents of the Functional Acknowledgment Transaction Set (997) for use within the context of an Electronic Data Interchange (EDI) environment. The transaction set can be used to define the control structures for a set of acknowledgments to indicate the results of the syntactical analysis of the electronically encoded documents. The encoded documents are the transaction sets, which are grouped in functional groups, used in defining transactions for business data interchange. This standard does not cover the semantic meaning of the information encoded in the transaction sets.

999 - Implementation Acknowledgment Purpose and Scope:

This X12 Transaction Set contains the format and establishes the data contents of the Implementation Acknowledgment Transaction Set (999) for use within the context of an Electronic Data Interchange (EDI) environment. The transaction set can be used to define the

control structures for a set of acknowledgments to indicate the results of the syntactical and relational analysis of the electronically encoded documents, based upon a full or implemented subset of X12 transaction sets. The encoded documents are the transaction sets, which are grouped in functional groups, used in defining transactions for business data interchange. This standard does not cover the semantic meaning of the information encoded in the transaction sets.

Technical Report Type 3 (TR3)

005010X230 Functional Acknowledgment For Health Care Insurance (997) Section 1.1

The purpose of this implementation guide is to provide standardized data content and structure to users of the ASC X12 997 transaction set. This implementation guide is intended to enable a receiver of an X12 transaction set, related to healthcare business processes, to report syntactical errors against the X12 standard, or to acknowledge receipt of an error-free transaction set. When implementing this TR3 in conjunction with the 999 transaction set, this 997 implementation guide can NOT be used for responding to any implementation guideline (TR3). This 997 implementation guide can NOT be used for any application level validations The purpose of this implementation guide is to provide standardized data content and structure to users of the ASC X12 997 transaction set. This implementation

guide is intended to enable a receiver of an X12 transaction set, related to healthcare business processes, to report syntactical errors against the X12 standard, or to acknowledge receipt of an error-free transaction set. When implementing this TR3 in conjunction with the 999 transaction set, this 997 implementation guide can NOT be used for responding to any implementation guideline (TR3). This 997 implementation guide can NOT be used for any application level validations.

Section: 1.3.2 Other Usage Limitations

The ASC X12 997 transaction set is designed to report only on syntactical conformance against the X12 standard or proper subsets of the X12 standard.

This 997 implementation guide can NOT be used for responding to any implementation guideline (TR3). This 997 implementation guide can NOT be used for any application level validations. The ASC X12 997 transaction set is designed to respond to one and only one functional group (i.e. GS/GE), but will respond to all transaction sets (i.e. ST/SE) within that functional group. It can not respond to (i.e. accept or reject) any subset of a transaction set. This ASC X12 997 Implementation Guideline can NOT be used to respond to any management transactions sets intended for acknowledgments, i.e., TS 997 and 999, or interchange control segments related to acknowledgments, i.e. TA1 and TA3.

005010X231 Implementation Acknowledgment For Health Care Insurance (999)

Section 1.1 Implementation Purpose and Scope

The purpose of this implementation guide is to provide standardized data content and structure to users of the ASC X12 999 transaction set for Health Care Insurance. This implementation guide is intended to enable a receiver of a functional group based on an X12 Implementation Guideline (TR3) related to Health Care Insurance business processes, to report the syntactical and relational analysis as specified by that implementation guideline (TR3), or to acknowledge receipt of an error-free transaction set. This 999 is not limited to only Implementation Guide (IG) errors. It can report standard syntax errors, as well as IG errors.

This 999 implementation guide can NOT be used for any application level validations.

FORMAL INTERPRETATION

Per your request for clarification:

It is requested X12 clarifies the position concerning whether or not both the 997 and 999 may be sent when acknowledging the same 5010 functional group for a healthcare implementation.

Version 5010 of the underlying standard permits the 997 and 999 to both be sent if mutually agreed upon by the trading partners, however, the TR3 documents (005010X230 – 997/005010X231 -999) written specifically to address acknowledgments for healthcare, preclude the use of the 997 for healthcare implementation, specifically when a 999 is also being generated. This is located in section 1.3.2 of the 005010X230 TR3.

Regarding your second question: *In addition, can a 997 be legitimately used to acknowledge a TR3?* While a 997 technically can be used for acknowledging any transaction with a functional group, it was not intended to acknowledge a TR3 or implementation guide, the 999 was created specifically to meet the needs of acknowledging an implementation of the standard. Specific to healthcare, the 005010X230 TR3 (997) precludes the use of the 997 when implementing acknowledgements for a Healthcare Implementation. See section 1.3.2 of the 005010X230 TR3.

FURTHER DISCUSSION:

Version 5010 of the standard both the 999 and 997 contain the transaction note 1/0100 which states "
Only one acknowledgement, either a single Transaction Set 997 or a single Transaction Set 999,
should be generated for a functional group unless mutually agreed upon". This transaction note has
been modified since Version 005010 of the standard to state the following: "Only one
acknowledgement, either a single Transaction Set 997 or a single Transaction Set 999 should be
generated for a functional group". While the 005010 transaction note may be confusing, for healthcare
implementation, the TR3 documents (999/997) document the industry recommendations for healthcare
acknowledgments. The X12 Technical Report Type 2 - the Acknowledgment Reference Model,
contains further information concerning the appropriate use of acknowledgements. The ARM contains
examples specific to Healthcare EDI implementation which give further guidance

During the Errata process for TR3 005010X231, now TR3 005010X231A1, the following statements were added the document, further clarifying the position of the 997 and 999 for healthcare implementation.

"When acknowledging a healthcare implementation guide (TR3) based transaction, only a single transaction set 999 can be used. When acknowledging a healthcare implementation guide (TR3) based transaction, the transaction set 997 must not be used."