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, 2021¹. In fact, CMS Blue Button has adopted the CARIN IG for Blue Button for all Medicare FFS beneficiaries² 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

---
² [https://bluebutton.cms.gov/developers/](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 Heath 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 or 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
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