



ARKANSAS HEALTHCARE TRANSPARENCY INITIATIVE: DATA SUBMISSION GUIDE & ONBOARDING FREQUENTLY ASKED QUESTIONS

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ACHI is a nonpartisan, independent, health policy center that serves as a catalyst to improve the health of Arkansans.



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GLOSSARY OF TERMS

Term	Definition
ACHI	Arkansas Center for Health Improvement
AID	Arkansas Insurance Department
APCD	Arkansas All-Payer Claims Database
CMS	The Centers for Medicare and Medicaid Services
Detached Signature File	A digital signature certifies and timestamps the files submitted to the APCD Data Intake process
DSG	APCD Data Submission Guide
HIPAA	Health Insurance Portability and Accountability Act of 1996
HIRRD	Health Insurance Rate Review Division of the AID
Onboarding	The process to enable data file submission for submitting entities. Process includes web portal assignment and activation, encryption key exchange and protocols, and data submission guidelines
Provider	A “provider” is defined as a person or entity comprised of physicians, nurse practitioners, and/or physician assistants rendering medical care
Rule 100¹	AID guidelines for submission of medical, dental, and pharmaceutical claims, unique identifiers, geographic and demographic information for covered individuals, and provider files to the Arkansas Healthcare Transparency Initiative for the purpose of creating and maintaining a multi-payer claims database as a source of healthcare information to support consumers, researchers, and policymakers in healthcare decisions within the state
SFTP	Secure File Transfer Protocol
Submitting Entity	Entity required to submit data per Act 1233 of 2015
UAMS	University of Arkansas for Medical Sciences
URL	Uniform Resource Locator. A URL specifies a resource location, or web address, for a website

¹ “Rule 100: Arkansas Healthcare Transparency Initiative Standards.” Arkansas Insurance Department Rule 100 is issued pursuant to Act 1233 of 2015 of the Arkansas 90th General Assembly, also known as the “Arkansas Healthcare Transparency Initiative Act of 2015.” Effective November 2, 2015.” <http://insurance.arkansas.gov/Legal/PropRules/PropRule100.pdf>.

OVERVIEW

Access to timely, accurate, and relevant data is essential to improving quality, mitigating costs, and promoting transparency and efficiency in the healthcare delivery system. Pursuant to the Arkansas Healthcare Transparency Initiative of 2015,¹ a comprehensive all-payer claims database (APCD) is being hosted by the Arkansas Center for Health Improvement (ACHI)—the APCD “Administrator”—on behalf of the Arkansas Insurance Department (AID) that houses member enrollment data, medical claims, pharmacy claims, dental claims, and provider data. As noted in Arkansas Insurance Department Rule 100 (the “Rule”),¹ the Arkansas Healthcare Transparency Initiative - Arkansas APCD Data Submission Guide (DSG) establishes file requirements from which submitting entities develop data files for voluntary or mandatory data submission.

APCD Technical Support

If you have questions about the Data Submission Guide or Onboarding, please visit the respective [Frequently Asked Questions](#) sections below. If you still have questions or concerns, please direct them to the APCD Technical Support team. (See contact information below.)

Technical support is available to all submitting entities and data users, and issues are logged and tracked upon notifying the APCD Technical Support team. The APCD Technical Support team will provide regular feedback during the resolution process.

Hours of Operation:

Monday through Friday, 9:00 am - 4:00 pm Central Standard Time
(excluding state and federal holidays)

APCD Technical Support Contact Information:

Phone: (501) 526-4306

Email: arapcd@uams.edu

Website: <http://www.arkansasapcd.net>

Please report issues by emailing a detailed message that includes your contact information to initiate the resolution process. The APCD Technical Support team will respond to your reported issue as soon as possible.

¹ Act 1233 of 2015

FREQUENTLY ASKED QUESTIONS

Data Submission Guide (DSG) Related Questions and Answers

	Question	Answer
1	How often are files submitted to the Arkansas APCD?	Data submission occurs according to the schedule in Rule 100 , Appendix A. See also Arkansas APCD Data Submission Guide 6.0.2018 , Submission Schedule section.
2	Is the hashed unique identifier, ME998, required if the Carrier Specific Unique Member ID is included in the data?	Yes. The hashed unique identifier, ME998, represents the member across products, plans, and enrollment dates. The Carrier Specific Unique Member ID can change based on member activity.
3	Fields on enrollment data appear to be similar to those collected on the medical claims, pharmacy claims and dental claims files. Can you clarify?	Many of the elements in the data files use similar semantics and a few are exact duplicates. These fields on the claims files must be submitted to allow the data to be joined across tables.
4	What might cause a member to have more than one enrollment record per month?	A member will have more than one enrollment record when they are enrolled in more than one product, have secondary coverage, have a break in enrollment, or have multiple active primary care provider (PCP) assignments within a reporting period. Accurate enrollment data are needed to calculate member months by product and by provider.
5	If the submitting entity is not a risk holder, many elements do not apply. Should this be handled using an exception request?	Yes. When a submission is coming from a non-risk holder (e.g., TPA, claims processor, pharmacy benefits manager, device benefit manager, etc.), several elements may not be available to report. A data exception shall be submitted to identify each unavailable element. See the Arkansas APCD Data Submission Guide 6.0.2018 Data Exceptions section.
6	Are denied claims required in the APCD?	No. Denied claims are not required for the APCD at this time.
7	Are claims that are paid under a “global payment” or “capitated payment” (thus, zero paid) reported in the Arkansas APCD?	Yes. Any medical claim that is considered “paid” by the submitting entity will appear in the appropriate claims file. “Paid amount” is reported as zero (0) and the corresponding allowed contractual and deductible amounts are calculated accordingly by the submitting entity.
8	Will claim versioning be included in the APCD processes?	Adjustments and versioning processes are not required for the initial historical or required submission of data files to the Arkansas APCD. Ongoing quarterly submissions must comply with one of the versioning options described in Arkansas APCD Data Submission Guide 6.0.2018 , Exhibit C – APCD Claims Versioning.
9	Are APCD data to be encrypted?	All Arkansas APCD data files must be encrypted before submission. The APCD team will provide encryption protocols to each submitting entity for file level

	Question	Answer
		encryption. See the Arkansas APCD Data Submission Guide 6.0.2018 Encryption Requirements section within the DSG for more information.
10	How many fields have to fail the data validation checks for data file submission failure?	If one or more data elements that are not already approved exceptions fail the data validation check, the entire submitted file will fail.
11	Whom should I contact if I have questions about the APCD or DSG?	Questions concerning APCD data should be sent to the APCD Technical Support team. APCD Technical Support information is listed in the Arkansas APCD Data Submission Guide 6.0.2018 , APCD Technical Support section.
12	When will DSG revisions be published?	Changes to the Arkansas APCD Data Submission Guide will be published by December of each year with required submission changes due the following March submission.
13	Where is the data encrypted?	All submitted data files are encrypted in motion and at rest in the APCD processes. Direct identifiers are transformed into meaningless strings of numbers and letters within the encrypted files.
14	Should the member ID and/or subscriber ID be masked by the submitting entity prior to submission?	<p>The member ID should be masked prior to submission to the APCD and mapped to the Carrier Specific Unique Member ID. The subscriber ID should be masked prior to submission to the APCD and mapped to the Carrier Specific Unique Subscriber ID.</p> <p>Masking should be consistent across all data submissions so the masked values representing the Member ID and Subscriber ID do not change.</p>
15	Do medical claims, pharmacy claims, and dental claims files require an APCD unique identifier?	No. The Carrier Specific Unique Member ID will be used to link medical claims, pharmacy claims, and dental claims together and to the enrollment or member data.
16	What is the definition of an Arkansas resident?	"Arkansas resident" means an individual for whom a submitting entity has identified an Arkansas address as the individual's primary place of residence. For individuals covered by a student health plan, "Arkansas resident" means any student enrolled in a student plan for an Arkansas college or university regardless of his or her address of record.
17	What is a submitting entity?	"Submitting entity" is defined in Arkansas Insurance Department Rule 100 in Section 4(21).
18	What entities are not considered an APCD submitting entity?	"Submitting entity" does not include an entity that provides health insurance or a health benefit plan that is accident-only, specified disease, hospital indemnity and other fixed indemnity, long-term care, disability income, Medicare supplement, or other supplemental benefit coverage.
19	How should county be determined?	If county is not available in your data, assign based on street address and ZIP code.
20	Can I access the Data Submission Guide (DSG) Q&A presentation?	<p>Yes. DSG slide presentations are available on the Arkansas APCD website.</p> <p>Note, the current presentation is for DSG version 5.1.2017. The presentation for DSG Version 6.0.2018 will be added. Because different presentations will</p>

	Question	Answer
		be available for each DSG version, be careful to select the information for the correct version.
21	Is the Data Submission Guide (DSG) available on the website a final version?	Yes. All versions of the DSG will be available on the website. Older versions are archived separately. https://www.arkansasapcd.net/Resources/DataSubmissionGuideResources/ .
22	Are headers and trailers to be included in the actual data files, or are those separate from the data files?	Yes. Header and trailer records are included in the actual data files. See Arkansas APCD Data Submission Guide 6.0.2018 Header and Trailer Records section in the DSG.
23	Are there any specific file formats/requirements for submitting look-up tables?	Yes. See Arkansas APCD Data Submission Guide 6.0.2018 , Lookup Files section in the DSG.
24	Should submitting entities include headers with the actual data element numbers?	Yes. Submitting entities should include headers with the data element numbers.
25	Where is the registration form available on the website?	On the Arkansas APCD website, two registration forms are available—one for PBMs and another for TPAs to utilize during the registration process. The APCD team created separate forms to streamline the two types of submitting entities. When entities use this form, the APCD Technical Support team can differentiate these submissions during the registration process. Please use the following link to access the forms: https://www.arkansasapcd.net/Other/RegistrationForms/
26	Is the submitting entity required to complete a registration form before submitting an exception form or a file	Yes. A completed registration form should be submitted before completing an Exception form or submitting data. Completed registration forms should be emailed to arapcd@uams.edu .
27	If a submitting entity were both an issuer and a TPA, would the entity register twice?	Yes. The submitting entity will register for each unique NAIC Company Code. This can be accomplished using one registration form.
28	Where is the exemption form available?	The exemption form is available on the APCD homepage at https://www.arkansasapcd.net/Home/ . Please note that exemption forms should be submitted directly to the Arkansas Insurance Department, as noted in Bulletin No.: 17-2015. Additionally, an entity should complete a registration form prior to submitting an exemption request.
29	How is the submitting threshold determined for submitting entities? For example, some submitting entities will have NAIC	Because both the submitting entity and the covered lives threshold is determined at the Group Code level, submission is determined by the total covered lives of all individual NAIC Company Codes that fall under the Group Code. Please refer to Arkansas Insurance Department Rule 100.

	Question	Answer
	Company Codes that do not meet the 2,000 covered lives threshold.	
30	How are entity codes assigned for TPAs and PBMs, which do not have an NAIC Company Code?	The APCD Technical Support team will assign a five to six alpha numeric entity code in such cases.
31	According to the DSG, there is a 300 MB limit for each file that will be uploaded to the APCD Web Portal. What does a submitting entity do if the file size exceeds the limit?	The Data Submission Guide provides instructions for naming files in the event submitting entities must send the files in pieces. The APCD data intake process is designed to receive and move a submitting entity's data as soon as possible in an attempt to prevent data overload. In addition, encryption of all files will make each file smaller. If there are problems submitting the data in pieces, the APCD Technical Support team will work with submitting entities to submit the data.
32	Can a submitting entity bypass the APCD Web Portal and instead submit directly via sFTP server?	Yes. The submitting entity must file an exemption with AID to request access to a direct sFTP solution.
33	If a submitting entity cannot meet the required submission deadline, should the entity submit an <i>exception</i> or an <i>exemption</i> form?	If a submitting entity is unable to meet a submission deadline, the entity must submit an exemption form. The exemption form was delivered via a bulletin distributed by the Arkansas Insurance Department. It is also located on the Arkansas APCD homepage, arkansasapcd.net . Note that exception forms are to be used for data elements and/or data file types unavailable by the submitting entity for submission to the APCD.
34	When will the APCD team send usernames and temporary passwords to submitting entities?	The APCD team will send usernames and temporary passwords for APCD Web Portal access one to two business days after registration.
35	What is the readiness audit and its purpose?	The readiness audit is the process in which the submitting entity prepares a sample data file, tests web portal access, tests encryption, and tests automated data submission.
36	Can the Arkansas APCD team share hashing instructions and/or code prior to execution of the readiness audit?	Yes. Please contact the Arkansas APCD team to request unique ID hashing instructions. If you would like to see code samples, please send your request to arapcd@uams.edu . Sample code is available for JAVA, Python, SQL and C Sharp.
37	What are control counts and what are they used for?	Each submitting entity shall provide control counts with data feeds to support baseline validation and benchmarking. See the Arkansas APCD Data Submission Guide 6.0.2018 , Control Count section in the DSG.

	Question	Answer
38	When do we have to submit our RSA and DSA public keys?	RSA and DSA public keys should be submitted after registration. The submission of these keys will trigger the Readiness audit and test file submission as outlined in the Onboarding Instructions on arkansasapcd.net
39	Can we submit test files before we exchange keys with the Arkansas APCD?	Test files cannot be submitted before keys are exchanged. The APCD Technical Support team will not be able to decrypt the data files without the keys.
40	Do all test files have to pass before we can submit production data?	Yes. All test files have to pass data validation before production files can be submitted.
41	Other states do not require the RSA public key. Why do we have to submit DSA public key, too?	The Arkansas APCD solution utilizes both RSA and DSA keys for an added layer of security. Some data could be considered personal health information. Using a DSA key adds additional security to the data as it is transferred to ACHI.
42	Can we use our RSA public key to encrypt our data?	No. You must use the APCD RSA key to encrypt your data files.
43	Can we resubmit files before receiving data validation report?	It is not recommended. If files must be resubmitted, notify the APCD Technical Support team so that they can manage the report production.
44	Our encryption is IPSwitch Professional which does not create a detached signature file. Can we opt out of sending a detached signature file?	No. The Arkansas APCD data intake automation process requires a detached signature file. The DSG includes a section with recommended no cost encryption options. See Arkansas APCD Data Submission Guide 6.0.2018 , Exhibit B – Encryption Protocols.
45	What archiving method and file name can we use?	The submission package containing the encrypted and signed file and the detached signature must be in the .zip archive format and must have a .zip extension.
46	Why won't my files upload in the APCD Web Portal?	The upload process begins when the upload button is clicked. File upload progress and completion can be viewed in the Account History tab of the web portal.
47	I submitted new exceptions and my old exceptions are no longer valid. Why?	Revised exception requests overwrite previous requests. If only the new changes were submitted, the previously submitted exceptions would be deleted. It is important to resubmit all exceptions each time.
48	Should the hashed value in ME998 only contain numbers?	No. The hashed values must be 24 bytes long and contain numbers, letters, and special characters, but NOT quotes, commas, or pipes.
49	How will ICD diagnosis and procedure codes be validated?	The value in the ICD indicator column (MC915A) will be used in determining the code set to validate ICD diagnosis and procedure codes, e.g. MC041, MC042, MC058, etc. The ICD columns will fail validation if the values do not match the code set specified by the ICD indicator column.
50	How will CPT and HCPC procedure codes be validated?	The value in the procedure code type columns (MC130, DC130) will be used in determining the code set to validate CPT, CDT, and HCPC codes in MC055 and DC032. Validation will fail if the values do not match the code set specified by the procedure code type columns.

	Question	Answer
51	Where are the training or instructions for file encryption and key exchange?	The instructions for encrypting data files to the Arkansas APCD standard are found on the Arkansas APCD website under Training. The website path is: https://www.arkansasapcd.net/Resources/Training/
52	Regarding the requirement - "Previous DSGs, versions 4.1.2015, 5.0.2015, and 5.1.2015, are no longer being used. All data received after March 31, 2018, must be in the format outlined in the current Arkansas DSG version 6.0.2018 until which time a new version is released." Does this also include historical data submitted after March 2018? Will those submissions need to reflect the 6.0.2018 DSG Version?	For submitting entities who qualified to participate in the Arkansas APCD, the historical data should be submitted as final paid claims but should be submitted under the DSG version in place when submission is scheduled. For example, if a submitting entity was required to submit in January 2016 (because they qualified in 2015) but has received the appropriate exemptions for late delivery in June 2018, they would submit historical data (final paid claims) under the DSG version in effect in when they qualified for the Arkansas APCD, in this case the DSG in place in January 2016.
53	Are previously approved exemptions nullified when new DSG versions are released?	No, unless the new version includes new requirements that resolve the issues resulting in an exemption. Then, the submitting entity should reach out to AID to rescind the exemption as necessary.
54	Is an exemption or exception required if the submitting entity cannot accommodate the Carrier Specific Unique Member ID and/or Carrier Specific Subscriber ID aliases that were added in DSG version 6.0.2018?	Submitting entities do not always know when these changes occur. If known, use the alias fields. If not, submit an exception using the Arkansas APCD online tool. An exemption is not required.
55	We would like to understand the example included for the quarterly submissions. This member seems to have a termination date of 2/28/2017. Does this means that even if member is not active in Q2 we should report him in the extracts and the member should be reported throughout the year of 2017? If so, any terminated or	The Arkansas APCD would expect to see terminated members in the data for the quarter in which they terminate. In the example referenced, the termination is in Q1 and the data is submitted in Q2. No more data would be expected for this terminated member unless they re-enroll at a later time. If a member is active, the enrollment record should be included. Additional records would be added for that member if a change occurred (relationship status change, new plan purchased, disenrollment, zip code change, etc.) If any field changes for the submitted member a new record is expected.

	Question	Answer
	active members in the reporting year would be present in all the quarterly file we submit. Is this an accurate understanding?	
56	Should control count header and trailer records be included in the empty files?	Yes. The DSG includes this requirement: If no data exists for a valid coverage period, an empty file should be submitted representing the coverage period. The empty file should contain the following rows: Header Header, Header Data, Control Header, Control Data, Data Header, Trailer Header, and Trailer Data. No Data Detail record should be sent.
57	Can you provide more details about the meaning of "missing coverage period"? How does it correspond to the empty file submission? Would this be applicable to our provider file?	Coverage periods are contiguous days. For example, some carrier send data monthly, others quarterly. If a monthly submission is followed and no data is available for a month, then an empty dataset should be submitted for the missing month. For example, if June 2016 is missing from the Q2 submission, submit an empty dataset with 2016-06-01 to 2016-06-30 in coverage dates. Provider files are complete replacements therefore it would not apply.
58	When would a negative value be used/expected for PC033 – Prescription Quantity?	A negative value can be used for a return, void, or backout if the submitting entity’s system uses these functions.
59	The data elements listed for file types are not necessarily always in numerical order. Should the file submissions reflect the order of data elements as they are listed in the DSG or should they reflect the numerical order?	Please submit in the order of the DSG. The ID column can be used to ensure the correct order.