



## **FAQ: CMS Adoption of Standards for Health Care Attachments Transactions and Electronic Signatures, and Modification to Referral certification and Authorization Transaction Standard Proposed Rule**

Last Updated: December 2022

The US Department of Health and Human Services (HHS) Centers for Medicare & Medicaid Services (CMS) released [the Adoption of Standards for Health Care Attachments, Transactions and Electronic Signatures, and Modification to Referral Certification and Authorization Transaction Standard](#) proposed rule on December 21, 2022. The proposed rule, if finalized, would adopt standards for “health care attachments” transactions, which would support both health care claims and prior authorization transactions, and a standard for electronic signatures to be used in conjunction with health care attachments transactions.

Comments on the Adoption of Standards for Health Care Attachments, Transactions and Electronic Signatures, and Modification to Referral Certification and Authorization Transaction Standard proposed rule are due **March 21, 2023**.

### **Key Provisions of the Proposed Rule include:**

- Defining attachment information as documentation that enables the health plan to make a decision about health care that is not included in either the claim or encounter information, or the referral certification and authorization transaction;
- New requirements for:
  - A code set to be used for health care attachment transactions
  - X12 standards for requesting and transmitting attachment information and HL7 standards for clinical information content
  - Electronic signature standards
- Defining Health Care Attachments Transactions as two types of transmissions from the provider to the health plan and one type of transmission from the health plan to the provider;
  - Specific standards to support each of the three transaction times
- The adoption of NCVHS recommended X12 and HL7 collaborative standards to support attachment-related transactions;
- The adoption of HL7 implementation guides as HIPAA standards for the attachment information included in health care attachments transactions, supporting both structured and unstructured attachment information;
- Defining electronic signatures as an electric sound, symbol, or process, attached to or logically associated with attachment information and executed by a person with the intent to sign the attachment information;
- A decision not to propose a standard for electronic signature or a requirements on when to require electronic signature, deferring to industry to provide feedback on these issues;
- The adoption of new standards for the referral certification and authorization transaction standard;
- A compliance date for the new standards no sooner than 24 months after the effective date of the final rule, which is 60 days after the final rule is published in the federal register.

If you have questions about the provisions contained within this proposed rule or would like to offer feedback, please contact the AHIMA Policy & Government Affairs team at [advocacy@ahima.org](mailto:advocacy@ahima.org).