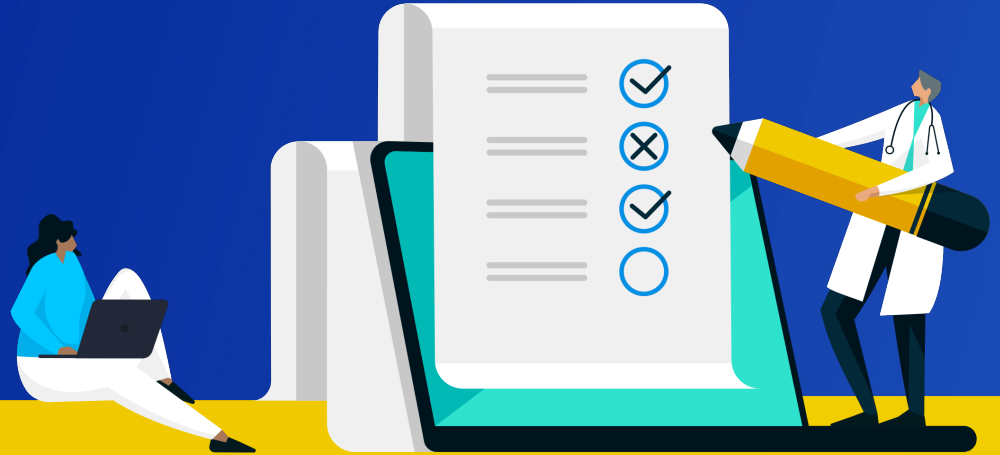


Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

- Presenter: Geanelle Herring
- March 31, 2026



Agenda

- Opening Remarks
- Background
- Overview of Rule
- Overview of Final Policies
- Compliance Timeline and Cost Savings
- Resources



Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

Acronyms in Presentation



C-CDA – Consolidated Clinical Document Architecture

CMS – Centers for Medicare & Medicaid Services

FAQ – Frequently Asked Questions

HHS – U.S. Department of Health and Human Services

HIPAA – Health Insurance Portability and Accountability Act of 1996

HL7[®] – Health Level Seven[®]

IG – Implementation Guide

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

Opening Remarks



Michael Cimmino

Director, National Standards Group

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

Setting the Stage



HIPAA

Mandates **adoption of standards for the electronic exchange of information** between providers and health plans



Affordable
Care Act

Mandates **adoption of updated transaction standards and operating rules** to reduce administrative burdens

Current Landscape: The Issues



Health plans need additional data for coverage decisions



No standard fields in authorization or claims transactions



Data submitted via non-standard free text



No HIPAA standards or implementation guides exist

Manual workflows persist (E.g.; mail, fax)

Overview

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

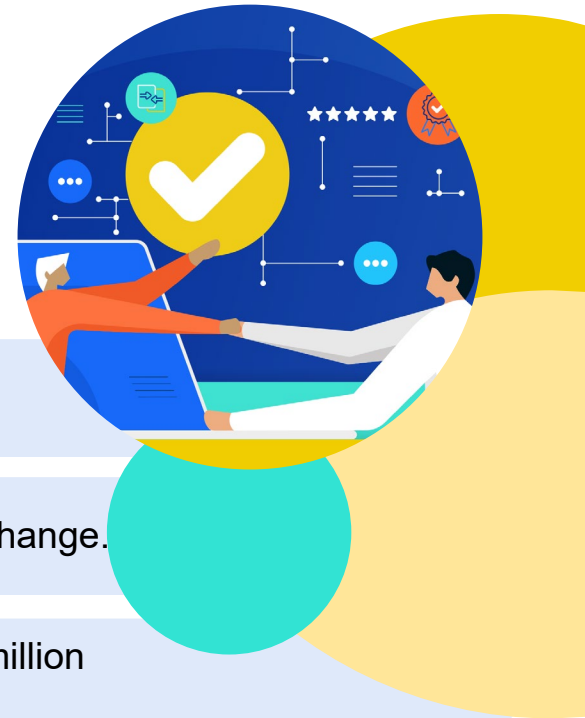
The Rule At a Glance

CMS finalized the “**Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures**” final rule (CMS-0053-F) (also referred to as “HIPAA Standards for Health Care Claims Attachments” final rule). The final rule:

Adopts **new** standards for health care claims attachments transactions (medical records, x-rays, provider notes, etc.).

Establishes requirements for electronic signatures to ensure secure exchange.

Has the potential to save the health care industry as much as \$781.98 million annually in administrative costs.



Key Drivers



Transmitting health care claims attachments has largely remained a **manual, labor-intensive, and paper-based** process.

Key benefits:



Improves electronic health information data exchange



Reduces manual information exchange processes, such as use of mail and fax



Reduces burden on health care providers and plans



Saves costs industrywide

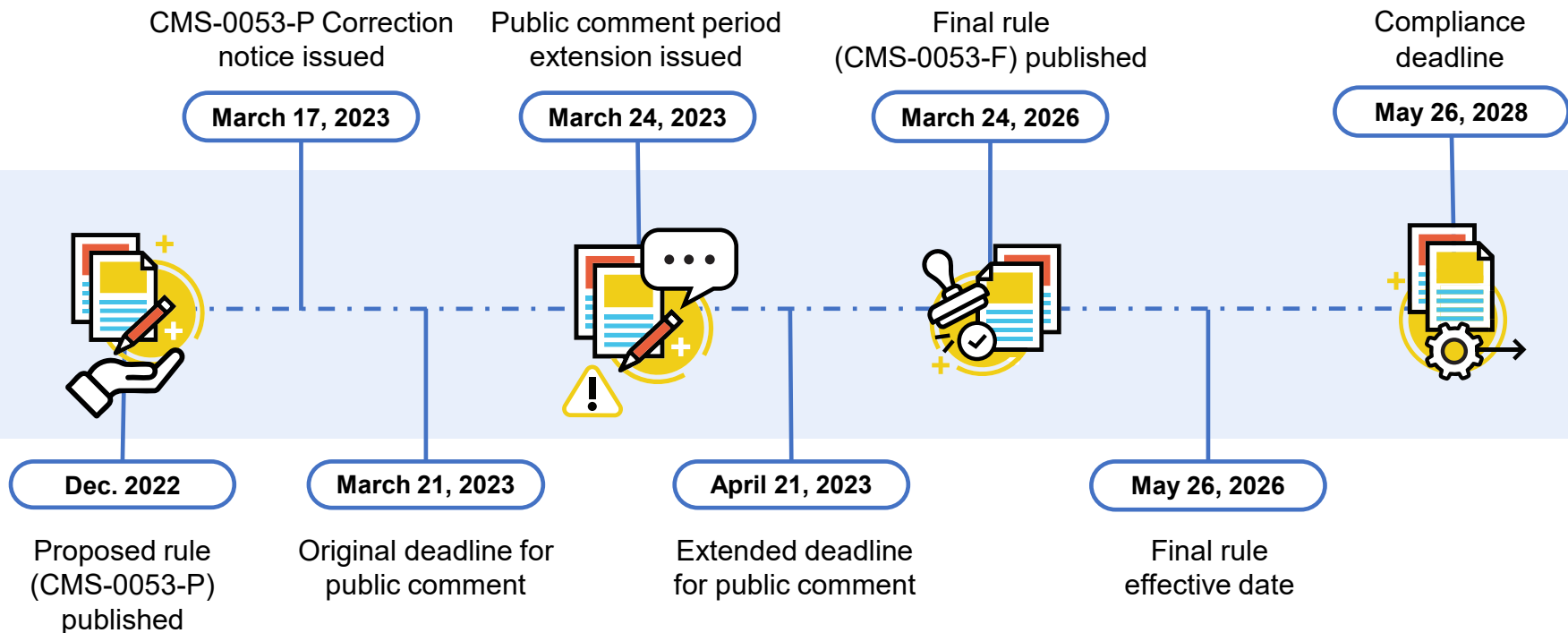


Increases focus on patient care with reduction in time spent on administrative tasks

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

How Did We Get Here?



Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)



This marks a critical step in modernizing health care administrative processes. By standardizing electronic health care attachments and enabling the use of secure electronic signatures, we're removing unnecessary hurdles, giving providers more time to care for their patients, and paving the way for a more connected and efficient health care system.



Dr. Mehmet Oz
CMS Administrator

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

From Proposal to Policy – What Made the Cut

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

Definition of Attachment Information

Attachment information is defined as documentation that enables a health plan to make a decision about health care that is not already included in:

Health care claims or equivalent encounter information transaction.



Definition of Health Care Claims Attachment Transaction

Finalizes the definition of the “health care claims attachments transaction” as the transmission of:

- Attachment information from a health care provider to a health plan in support of a health care claim or equivalent encounter information transaction.
- A request from a health plan to a health care provider for attachment information.



Adoption of X12N 275 Standard

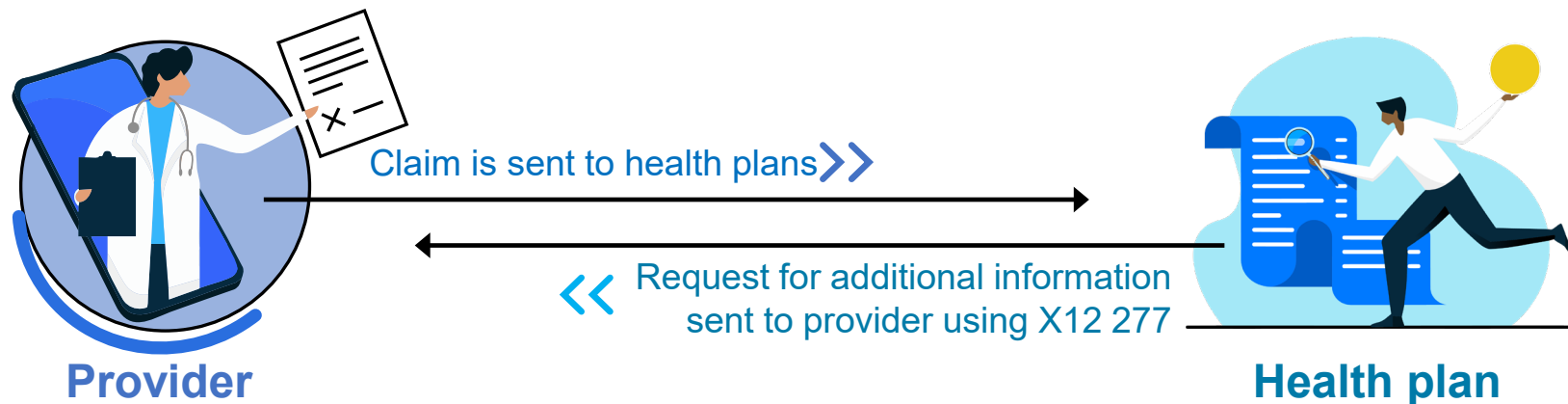
Adopts Version 6020 X12N 275 as the standard a provider must use to electronically transmit attachment information to a health plan to support health care claims or equivalent encounter information transaction.



Serves as the electronic envelope for health care claims attachment information

Adoption of X12 277N Standard

Adopts X12N 277 as the standard a health plan must use to electronically request attachment information from a health care provider to support a health care claim.



Adoption of Certain HL7[®] IGs

HHS is adopting the HL7 CDA standard and associated IGs, as well as the HL7 Digital Signatures Guide.

Benefits at a Glance

- Supports exchange of clinical documents between those involved in patient care
- Supports re-use of clinical data for public health reporting, quality monitoring, patient safety, and clinical trials
- Can be reused in multiple applications

**Refer to appendix for a list of required IGs*

Required HL7 IGs and Standards

HL7 IG for CDA Release 2: Consolidated CDA (C-CDA) Templates for Clinical Notes (US Realm) Draft Standard for Trial Use Release 2.1, Volume One – Introductory Material, June 2019 with Errata (HL7 C-CDA IG Volume One)

HL7 IG for CDA Release 2: C-CDA Templates for Clinical Notes (US Realm) Draft Standard for Trial Use Release 2.1, Volume Two – Templates and Supporting Material, June 2019 with Errata (HL7 C-CDA IG Volume Two)

HL7 CDA Release 2 Attachment IG: Exchange of C-CDA Based Documents, Release 2, March 2022 (HL7 Attachments IG)

HL7 IG for CDA Release 2: Digital Signatures and Delegation of Rights, Release 1 (Digital Signatures Guide)

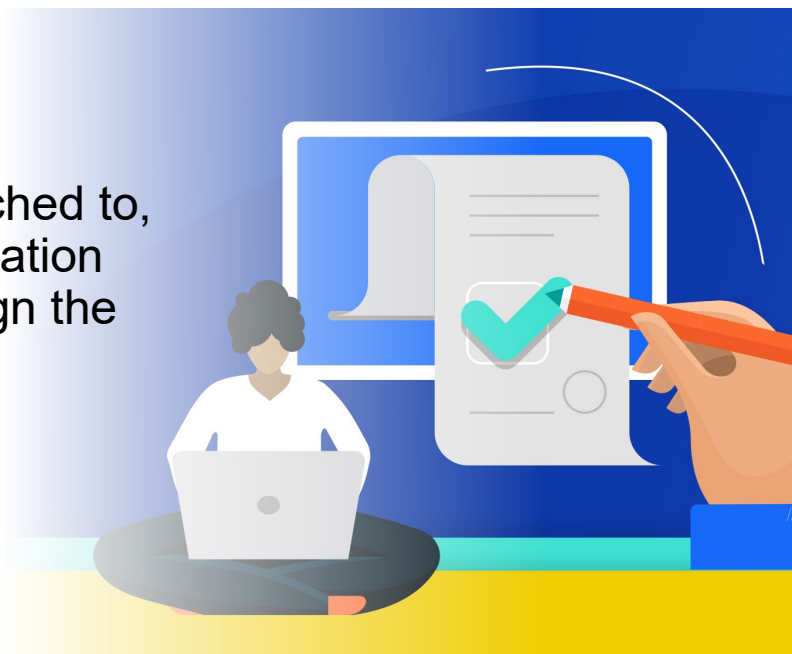


Electronic Signatures Definition and Standards

Defines electronic signatures as:

“An electronic 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.”

Requires that electronic signature standards conform to implementation specifications in the HL7 Digital Signatures Guide



The Impact

Improving Health Care Efficiency:

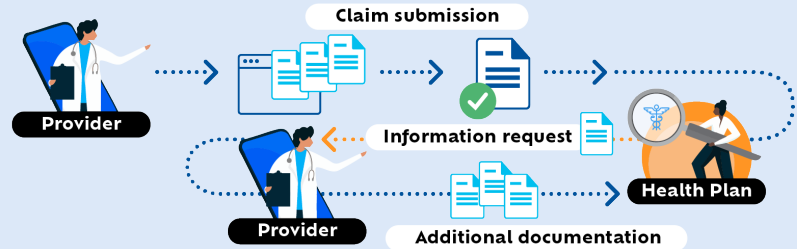
Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

How Do The Newly Adopted Standards Apply?

The finalized standards in the “HIPAA Standards for Health Care Claims Attachments” final rule apply to **both solicited and unsolicited attachments.**

1. Solicited Attachments

The health plan requests additional information after receiving a claim for a rendered service. The provider submits the requested documentation to complete the claim review.



2. Unsolicited Attachments

The provider includes attachments with the initial submission of a claim, typically when a health plan policy requires additional documentation upfront.



Compliance Dates

Proposals



Compliance Date



X12N 275 Standard

X12N 277 Standard

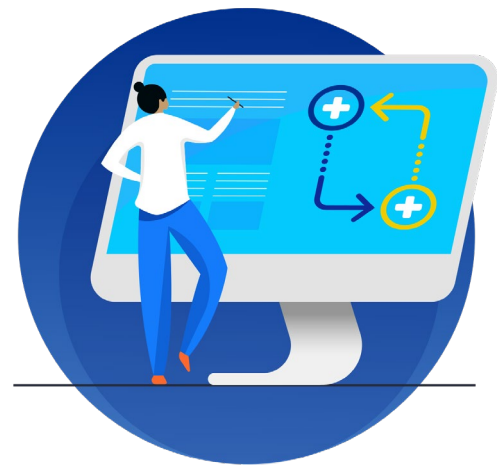
HL7 CDA IGs

Electronic Signatures
Standard

May 26, 2028
(24 months
after effective
date of final
rule)

Estimated Cost Savings

This rule is projected to save the industry **\$781 million annually**. Based on the estimates included in the Regulatory Impact Analysis (RIA), the primary net annualized cost, discounted at 7 percent, to the industries is approximately \$303.75 million. This estimate includes the difference between the primary net annualized costs of \$478.23 million, which includes the regulatory review costs of \$14.13 million, and primary net annualized savings of \$781.98 million.



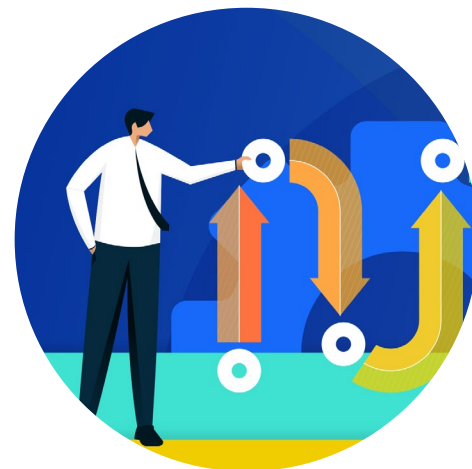
How to Learn More

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

Implementation Resources and Support

To view the final rule in the Federal Register, visit: <https://www.federalregister.gov/d/2026-05676>. For more information, view the press release, frequently asked questions, and fact sheet ([CMS.gov/Events & News](https://www.cms.gov/Events&News)).



For more information or support, please contact AdministrativeSimplification@cms.hhs.gov.

Thank you!

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures final rule (CMS-0053-F)

- For more information about Administrative Simplification requirements, visit <https://www.cms.gov/priorities/key-initiatives/burden-reduction/administrative-simplification>.
- For the latest news about Administrative Simplification, sign up for [Email Updates](#).
- Send questions, comments and feedback on Guidance Letters, Informational Bulletins, and FAQs, and any other related matters to the AdministrativeSimplification@cms.hhs.gov mailbox.

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)

How to Submit Questions

Improving Health Care Efficiency:

Exploring the Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures Final Rule (CMS-0053-F)