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CIVHC Substance Use Disorder (SUD) Claim Collection FAQ

| Question | Response |
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| Why was CIVHC able to begin collecting SUD data? | All rules governing use of SUD data are regulated under part two of item 42 in the Code of Federal Regulations (42 CFR Part 2). Section 3221 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act , passed in March 2020, introduced changes to 42 CFR Part 2 meant to bring it into better alignment with certain aspects of the HIPAA Privacy, Breach Notification, and Enforcement Rules. The changes expanded the use of SUD data, allowing CIVHC to begin collection of SUD claims as long as CIVHC was able to ensure the separation of SUD data from overall CO APCD data. |
| When did CIVHC begin collecting SUD data? | Historically, CIVHC has not had the capability to meet the compliance demands for SUD data collection governed under 42 CFR Part 2, and advised payers to exclude SUD-related claims from their monthly submissions. However, the changes to 42 CFR Part 2 under the 2020 CARES Act enabled collection of SUD claims data for covered entities that could identify and segregate SUD-related data. The expansion of regulations prompted CIVHC to re-visit collection of SUD-related claims data. In 2021, CIVHC began development of a flag indicator to identify SUD-related claims in coordination with data vendor, the Humans Services Research Institute (HSRI). The flag went into effect in July 2022. After implementation of the flag, CIVHC instructed payers to resume inclusion of SUD data in their monthly file submissions beginning in March 2023. |
| How does CIVHC identify SUD-related claims? | CIVHC developed an indicator, referred to as an “SUD flag,” which identifies any SUD claim submitted to the CO APCD. The flag is a comprehensive list of claim codes provided by the Colorado Department of Health Care Policy and Financing (HCPF) and CMS Research Data Assistance Center (ResDAC) and includes over 900 codes including diagnosis, procedure, place of service, CPT4, CPT4 Mod I, MSDRG, APRDRG, ICD primary procedure codes, and revenue codes. |
| How are SUD claims sequestered from other claims data in the CO APCD? | When the SUD flag identifies claims that contain SUD-related codes, they are moved to a securely sequestered table within the CO APCD that is not used for day-to-day reporting or analytics. |



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| | <h3 style="text-align: center;">SUD Ingestion Process</h3> <pre> graph TD A[Payer Submissions] --> B[Ingestion Process] B --> C[Data Warehouse] C --> D[All claims (with no SUD)] C --> E[Claims with an SUD indicator] D <--> E D --> F[Regular View Data Tables] E --> G[SUD-specific tables] </pre> |
| <p>Are payers required to submit SUD data to the CO APCD?</p> | <p>Payers are advised to submit SUD claims, but are not currently mandated to. This means SUD-related data in the CO APCD will be incomplete. CIVHC is currently working to address this gap.</p> |
| <p>How will CIVHC use SUD Data?</p> | <p>Currently, only aggregated SUD-related data can be included in any reporting done by CIVHC, and it must go through rigorous compliance and quality reviews. CIVHC will continue to monitor changes to 42 CFR Part 2 and adjust appropriate SUD data collection and release policies accordingly.</p> |

We will continue to update this document as new policies impacting SUD claim collection in the CO APCD go into effect. If you have additional questions about SUD claims collection and use, please contact us at info@civhc.org.