



July 27, 2015

Ms. Karynlee Harrington, Acting Executive Director  
Maine Health Data Organization  
151 Capitol Street  
102 State House Station  
Augusta, ME 04333-0102

**Re: Proposed changes to Rule Chapter 243, “Uniform Reporting System for Health Care Claims Data Sets”**

Dear Ms. Harrington:

On behalf of Anthem Blue Cross and Blue Shield in Maine, I submit the following comments with respect to the proposed changes to MHDO *Rule Chapter 243, “Uniform Reporting System for Health Care Claims Data Sets.”*

Section 2(A)(12) of the proposed rule requires health care claims processors and their subcontractors to ensure that they are not submitting claims duplicated by any other source. Anthem has two concerns with respect to this proposed change.

First, we would suggest that the application be limited to other sources with whom the health care claims processor or carrier has a contractual relationship and who is acting on behalf of the claims processor—a health care claims processor has no way to know or coordinate the submission of claims by an independent third-party with whom the carrier does not have a relationship.

Second, it would be virtually impossible to ensure that duplicate claims are never submitted. As a result, we would suggest a requirement that health care claims processors use best efforts to ensure that duplicate claims are not submitted.

In addition, with respect to section 2(A)(14)(d), we would again suggest that it be clarified that the “entity” refers to only those entities with whom a carrier has a contractual relationship and who is acting on behalf of the claims processor.

Thank you for the opportunity to share these comments and please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Kristine M. Ossenfort".

Kristine M. Ossenfort, Esq.  
Director, Government Relations