

UNIVERSITY OF FLORIDA  
INFORMATION PRIVACY POLICIES & PROCEDURES  
PRIVACY MANAGEMENT

## HIPAA: Electronic Data Interchange - EDI

### □ POLICY

Rev: 05/01/2006

The University of Florida will comply with all applicable parts of the federal Privacy Rule relating to electronic data interchange (EDI).

### □ DEFINITIONS

*Code Set* means any set of codes used to encode data elements, such as tables of terms, medical concepts, medical diagnostic codes, or medical procedure codes. A code set includes the codes and the descriptors of the codes.

*Data Set* means a semantically meaningful unit of information exchanged between two parties to a transaction.

*Electronic Data Interchange*: Electronic transfer of information, such as electronic media health claims, in a standard format between trading partners.

*National Provider Identifier (NPI)*: The standard unique health identifier for health care providers; a 10-position numeric identifier, with a check digit in the 10th position, and no intelligence about the health care provider in the number.

*Standard Transaction*: A transaction that complies with the applicable standard adopted under this part. Standard transactions include:

- a. Health care claims or equivalent encounter information
- b. Payment and remittance advice
- c. Claim status inquiry and response
- d. Eligibility inquiry and response
- e. Referral certification and authorization inquiry and response
- f. Enrollment and disenrollment in a health plan
- g. Health plan premium payments
- h. Coordination of benefits

*Trading partner agreement*: An agreement related to the exchange of information in electronic transactions, whether the agreement is distinct or part of a larger agreement, between each party to the agreement.

### □ PRIVACY REQUIREMENTS

1. *General Rule*. If the University of Florida conducts with another covered entity (or within the same covered entity), using electronic media, a transaction for which the Secretary has adopted a standard, the transaction must be conducted as a standard transaction (see definition above).
2. *Exception for direct data entry transactions*. A health care provider electing to use direct data entry offered by a health plan to conduct a transaction for which a standard has been adopted must use the applicable data content and data condition requirements of the standard when conducting the transaction. The health care provider is not required to use the format requirements of the standard.
3. *Use of a business associate*. The University of Florida may use a business associate, including a health care clearinghouse, to conduct a transaction covered by the EDI standards. If UF chooses to use a business associate to conduct all or part of a transaction on its behalf, the university must require the business associate to:
  - a. Comply with all applicable requirements of the EDI regulations.
  - b. Require any agent or subcontractor of the business associate to comply with all applicable requirements of the privacy and security regulations.

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**HIPAA: Electronic Data Interchange - EDI (continued)**

4. *Trading Partner Agreements.* The University may not enter into a trading partner agreement that would:
  - a. Change the definition, data condition, or use of a data element or segment in a standard.
  - b. Add any data elements or segments to the maximum defined data set.
  - c. Use any code or data elements that are either marked “not used”, or are not in, the standard’s implementation specification(s).
  - d. Change the meaning or intent of the standard’s implementation specification(s).
5. *National Provider Identifiers.* The University, as a covered health care provider must:
  - a. Obtain an NPI from the National Provider System (NPS) for itself and for any subparts that would be a covered health care provider if it were a separate legal entity.
  - b. Use the NPI to identify itself on all standard transactions that it conducts where its health care provider identifier is required.
  - c. Disclose its NPI, when requested, to any entity that needs to identify the University as a covered health care provider in a standard transaction.
6. *Code Sets - General requirements.* When conducting a standard transaction as described above, the University must meet the following requirements:
  - a. *Medical data code sets.* Use the applicable medical data code sets described in §162.1002 that are valid at the time the health care is furnished.
  - b. *Nonmedical data code sets.* Use the nonmedical data code sets as described in the implementation specifications that are valid at the time the transaction is initiated.

**REFERENCE:** CR Part 162: Electronic Data Interchange

**EXHIBITS:** None