



**ASC Administrative  
Policy and Procedure**

# **ASC Maintenance Request and RFI Processing Manual**

**Procedures for Developing and Maintaining Standards,  
Technical Reports, and Interpretations**

**(ASC02)**

# Table of Contents

1	General Information .....	4
1.1	Introduction .....	4
1.2	Authority .....	4
1.3	Background .....	4
1.4	Administrative Assignments.....	5
1.5	Lists and Labels.....	5
1.6	Revisions.....	5
2	Committee Roles Supporting MR Processing .....	6
2.1	Project Delegate .....	6
3	Processing a Maintenance Request .....	7
3.1	Notify PRB of the Request.....	7
3.2	X12J Reviews the Assignment .....	9
3.3	PRB Annual Review.....	10
4	Internal Code List Maintenance.....	10
4.1	ASC Review Period .....	11
4.2	CMR Determination .....	11
4.3	Technical Correction after X12J Approval.....	12
4.4	PRB Publication Determination.....	12
5	The Maintenance Process.....	12
5.1	Extraordinary Situations.....	13
5.2	Subcommittee Considers the Request.....	14
5.3	Subcommittee Disapproves the Request.....	14
5.3.1	PRB Reviews the Disapproval.....	15
5.4	Subcommittee Develops Proposed Revisions.....	15
5.4.1	Reviewing the Impact Assessment.....	16
5.4.2	Developing Proposed Revisions .....	17
5.5	Subcommittee Ballot on Proposed Revisions .....	17
5.6	X12J Reviews Proposed Revisions.....	18
5.7	X12J Remands the Proposed Revisions.....	19
5.8	Subcommittee Considers X12J’s Explanation .....	20
5.9	X12J Considers Subcommittee Resolution.....	20
5.10	PRB Authorizes Ballot.....	21
6	Committee Ballot.....	21

6.1	Evaluate Ballot Results .....	22
6.2	Distribute Ballot Comments .....	22
6.3	Process Technical Comments .....	23
6.4	Process Administrative Comments .....	23
6.5	Final PRB Review .....	23
7	Late Stage Corrections .....	24
7.1	Minor Corrections .....	24
7.2	Corrections after Committee Ballot Approval .....	24
7.3	Corrections after Approval to Publish .....	25
7.3.1	Technical and Non-technical Substantive Issues .....	26
7.3.2	Non-technical Non-substantive Issues .....	28
8	Developing an Interpretation .....	28
8.1	Processing the Request .....	29
8.2	Informal Interpretation .....	30
8.3	Formal Interpretation .....	31
9	Modifying an Interpretation .....	32
10	Terminology .....	33
11	Document History .....	33

# 1 General Information

## 1.1 Introduction

The Accredited Standards Committee (ASC) Steering Committee (Steering) is responsible for this policy and associated procedures. Members agree to adhere to X12's policies and procedures as a condition of membership. Non-member participants afforded specific collaboration privileges agree to adhere to X12's policies and procedures as a condition of those privileges. Any party may submit a revision suggestion at [x12.org/maintenance-requests](https://x12.org/maintenance-requests).

## 1.2 Authority

X12 maintains corporate rules which define overall corporate policies and procedures. X12 committees are required to establish a committee operating manual and are generally permitted to establish other committee-level rules that apply only to that committee. In some cases, corporate policy is intended to stand-alone and lower-level rules are prohibited. A committee's subordinate groups may be required or permitted to establish group-specific rules that supplement the committee rules except when lower-level rules are prohibited. All supplemental rules shall provide more detail or be more restrictive than the higher-level governance. Supplemental rules are not permitted to duplicate, contradict, countermand, supersede, or overrule any higher-level rules. No accommodation is intended or provided to permit a committee or subordinate rule to override a higher-level rule with a more permissive requirement. In the case of any inconsistency between the corporate, committee, and subordinate group rules, the higher-level governance shall always prevail.

X12's primary organizational policies are established in the **X12 Bylaws (CAP01)** and supplemented by other corporate governance. The ASC's primary committee-specific rules are established in the **ASC Operating Manual (ASC01)**. The committee-specific rules established herein supplement that corporate and committee governance. These rules shall not be supplemented by subordinate group rules except where such supplemental governance is specifically permitted herein. Any such supplemental governance shall be in accordance with the previous paragraph, be reviewed by the P&P task group, approved by Steering, and posted on X12's publicly accessible policy and procedure web page.

## 1.3 Background

X12 maintains numerous standards and related products and makes them available to the public. A current product list is available online at [x12.org/products](https://x12.org/products). A number of these products are maintained by the ASC and this document details the maintenance procedures that apply to those products.

X12 also publishes interpretations related to how its work products are implemented and used. Each interpretation is a response to one or more questions posed in a Request for Interpretation (RFI). This document details the ASC process for developing and modifying interpretations.

Within X12, the term “maintenance” includes activities related to revising existing products and activities related to developing new products. The terms “maintenance request”, “data maintenance”, and “request” and the acronyms “MR” and “DM” are used interchangeably herein.

## 1.4 Administrative Assignments

X12 staff is responsible for administrative tasks that support this governance. The staff processes are detailed separately in internal operations documentation.

## 1.5 Lists and Labels

There are several categories of information that may be presented as lists. To assist users of this document, a different presentation is used for each category. Single items for these categories are presented in list form. In other words, one item is presented in sentence format; two or more items that occur at the same step are presented as a list, denoted as indicated here.

- Actions/Tasks are denoted by numbered lists. The tasks do not always have to be performed sequentially.
- Choices/Decisions are denoted by capital letters.
- Lists/Criteria are denoted by bullets.

## 1.6 Revisions

The Policy and Procedures Task Group (P&P) is responsible for revisions to this document. Revision recommendations may be presented by Steering, P&P, or any party via [maintenance-requests.x12.org](https://maintenance-requests.x12.org).

P&P reviews **ASC02** at least biennially to ensure the policies and procedures are recorded in the simplest manner with emphasis on clarity and accuracy.

Following P&P approval of a revised draft, the draft shall be submitted to Steering with P&P’s recommendation for action. Steering shall review the draft and either provide feedback to P&P on the revisions or approve the draft for an ASC committee ballot.

## 2 Committee Roles Supporting MR Processing

Several subcommittee-level roles, or positions, are critical to ensuring efficient and effective processing of X12 MRs. Two of these roles, PRB Representative and X12J Representative, are defined within **ASC Subcommittees and Subordinate Groups (ASC05)**. Each MR will be guided through the MR process by a Project Delegate. Each subcommittee may elect whether to have its X12J Representative serve as Project Delegate for all its MRs or to name other constituents to serve in that role for each MR. Subcommittees may define other supporting roles as necessary to ensure timely and efficient processing of its MRs.

### 2.1 Project Delegate

A project delegate works closely with the subcommittee's primary X12J representative and other subcommittee constituents and is responsible for ensuring timely progress on the MR and for following the established policies and process requirements.

Except when the X12J Representative is serving as the subcommittee's project delegate, a subcommittee constituent shall not serve as the project delegate for more than five (5) MRs at any one time.

Each project delegate must possess certain knowledge, experience, and skills. Project delegates shall meet all the following criteria:

1. Have a solid understanding of the corporate, committee, and subcommittee policies related to ASC maintenance request processing.
2. Have a solid understanding of the X12 MR process.
3. Have a solid understanding of X12 technical requirements, including syntax and semantic requirements, design rules, and other committee guidelines.
4. Have strong interpersonal skills.
5. Have strong written and oral communication skills.

Each project delegate is responsible for the following:

1. Coordinate all subcommittee discussion related to the assigned MR.
2. Schedule group meetings, coordinate online collaboration, assign tasks, and monitor deliverables to ensure timely completion of the MR.
3. Ensure the group follows all applicable corporate, committee, and subcommittee policies and procedures.
4. To support the consensus decisions of the MR development group.

## 3 Processing a Maintenance Request

Suggestions or requests related to new products and revisions to current products are submitted via one of X12's online forms.

*Processing Suggestions, Input, and Feedback (CAP11)* defines the corporate governance for organizational and administrative steps that precede or follow this committee-level procedure. The predecessor steps include, but are not limited to, vetting to ensure all necessary information is included, storing information in X12 repositories, assigning tracking numbers, gathering public input, assigning the request to an X12 committee, and initiating the maintenance request (MR). Once a maintenance request is initiated staff determines the maintenance category and assigns a developing subcommittee.

Staff tracks the life cycle of each request in a registry to accommodate self-service status inquiries, organizational research, and institutional memory.

Maintenance requests related to the EDI Standard's internal code lists are assigned to the X12J Technical Assessment Subcommittee (TAS) and processed in accordance with section **4 Internal Code List Maintenance**.

Maintenance requests related to technical reports and components of the EDI Standard other than internal code lists are processed as described in section **3.1 Notify PRB of the Request**. PRB shall approve each maintenance request before any ASC group commences work or analysis on the maintenance request.

Requests for interpretation are processed as described in section **8 Developing an Interpretation**.

Information about external code lists as documented in Appendix A of X12.3 is not part of the X12 EDI Standard. The identifying and descriptive information for these external code lists, such as owner, description, purpose, URL, address, etc., is controlled by the external code list maintainer. Such information is included in X12 products for reference purposes only and is not subject to ASC approval processes. Staff is responsible for maintaining accurate identifying and descriptive information for these external code lists, including validating the information on a regular basis. Staff is also responsible for maintaining accurate identification and descriptive information for any X12 product or URL referenced within another X12 product.

### 3.1 Notify PRB of the Request

Staff notifies PRB of the maintenance request. PRB performs a high-level evaluation of the appropriateness of the request and initial assignment in relation to ASC

purpose and scope statements. This is not an evaluation of the technical or business merits of the request nor a determination that the request will result in any revision.

The PRB review criteria are:

- Does the maintenance request align with the ASC purpose and scope?
- Does the maintenance request align with the purpose and scope of an ASC subcommittee?
- Is the maintenance request assigned to the ASC subcommittee with the most relevant material interest in the request?

Each MR is assigned to one developing subcommittee. Regardless of any subordinate group delegation within a subcommittee, the subcommittee itself remains officially responsible for the request throughout the maintenance process.

PRB may later reassign development responsibility based on additional information and a majority vote of PRB constituents.

A subcommittee shall not commence work on a maintenance request prior to PRB acceptance of the maintenance request as described below.

1. Staff posts a voting thread (poll) in the PRB iMeet workspace notifying PRB of the maintenance request and its initial assignment. The thread is posted as an electronic ballot open for 5 calendar days. The post shall state that PRB's acceptance of the request and its assignment will be recorded at the close of the review period unless a comment disputing one of those items is posted in the thread by the close of the review period.  
The PRB chair may call for an abbreviated review period if necessary to ensure timely assignment. Unless a subcommittee's primary representative posts an objection to the abbreviated review period within 48 hours of notice of the abbreviated review, the abbreviated review period shall be honored.
2. PRB constituents shall evaluate each request based on the criteria described above. Any PRB constituent with a concern, question, or dispute related to the initial assignment or the appropriateness of the maintenance request shall enter a comment in the voting thread within the review period.
3. If no PRB constituent posts a comment noting a concern, question, or dispute related to the initial assignment or the appropriateness of maintenance request by the end of the review period, the request and assignment are considered accepted.
  - a. Staff notes the acceptance in the next PRB minutes.
  - b. Staff assigns the developing subcommittee's X12J representative as the initial project delegate.
    - i. The developing subcommittee may later opt to replace the X12J representative with another project delegate in accordance with its policies or procedures.



- c. Staff initiates the appropriate process:
  - i. For maintenance requests related to a request for interpretation, initiate the activities defined in section **8 Developing an Interpretation**
  - ii. For maintenance requests related to components of the EDI Standard other than internal code lists and maintenance requests related to technical reports, initiate the activities defined in section **3.2 X12J Reviews the Assignment** and section **5 The Maintenance Process**. These activities can commence simultaneously or separately.
4. If a PRB constituent posts a comment noting a concern, question, or dispute related to the appropriateness of the maintenance request or the initial assignment by the end of the review period, the PRB shall discuss the MR.
  - a. The PRB chair initiates an iMeet discussion or adds the matter to the next PRB meeting agenda for discussion.
  - b. The PRB discussion shall result in one of the following PRB actions:
    - Revise the maintenance request
    - Reassign development responsibility
    - Reject the MR as not falling within an ASC purpose and scope
  - c. Once consensus is reached, the PRB chair directs staff to make any agreed upon revision(s) to the maintenance request, confirms PRB acceptance or rejection, provides a justification for any rejection.
  - d. Staff updates the registry and notifies the submitter if the maintenance request was rejected.

## 3.2 X12J Reviews the Assignment

Staff notifies X12J of the maintenance request and the developing subcommittee assignment. This is the appropriate time for other subcommittees to indicate a material interest in the outcome of the request. An indication of material interest is informational; it does not convey any special privileges or responsibilities related to the maintenance request.

1. Staff posts a discussion thread in the X12J iMeet workspace notifying the X12J constituents of the maintenance request and its initial assignment.
2. The X12J representative of each ASC subcommittee reviews the maintenance request within 5 calendar days of the notice and evaluates whether they agree with the developing subcommittee assignment.

If an ASC subcommittee's X12J representative disagrees with the assignment and believes their subcommittee should be the developing subcommittee, the subcommittee's X12J representative posts a comment in the iMeet thread requesting reassignment within the review period.

3. If a majority of X12J constituents agree with PRB's developing subcommittee assignment, the X12J representative from the developing subcommittee moves the MR forward to the developing subcommittee. Proceed to section **5 The Maintenance Process**.

4. If a majority of X12J constituents disagree with PRB's developing subcommittee assignment, the X12J PRB representative discusses the matter with the PRB chair and requests PRB reconsideration. Return to section **3.1 Notify PRB of the Request**.

### 3.3 PRB Annual Review

PRB evaluates all open maintenance requests annually, as part of their Fall Standing Meeting agenda, to ensure that maintenance requests are addressed timely and do not stagnate such that the requested work is no longer relevant, pertinent, or useful to the requestor or in the scenario described by the requester.

The forward progress evaluation shall be based on the following criteria:

- Has any ASC subcommittee, task group, or work group taken a formal action on the maintenance request in the preceding 12-month period?
  - Formal action includes active collaboration on a solution to satisfy the request, a vote on revisions related to the request, or active efforts to gather industry input on the request.
  - A vote to defer the work shall not count as formal action for this purpose.
- If the request was submitted more than 18 months prior to the review, is the requestor still interested in the requested work being completed? If not, can another champion for the requested work be found within 30 calendar days? If so, the registry is updated to include the identified champion as the requestor.
- Is there a stalemate between X12 subcommittees preventing forward progress? If so, in the opinion of PRB, can the stalemate be resolved within 90 calendar days such that forward progress can occur?
- Are there any special circumstances to consider?

Any maintenance request that does not make demonstrable forward progress in the twelve-month period since the previous annual review shall be classified as at-risk. PRB has the option of reassigning developing subcommittee responsibility as part of the at-risk determination. PRB shall either reassign developing subcommittee responsibility or cancel any at-risk maintenance request that does not make demonstrable forward progress in the twelve-month period following the initial at-risk determination. If the maintenance request is cancelled, a new request for the same or similar work may be submitted if the circumstances causing the stagnation change in the future. PRB may, at the discretion of the PRB chair, review at-risk maintenance requests more frequently than once per year.

## 4 Internal Code List Maintenance

Internal code lists are maintained using the procedures defined in this section. X12 also maintains external code lists, which are a separate type of code list, under the Registered

Standards Committee (RSC) using procedures defined in ***External Code Lists (CAP12)***.

A Code Maintenance Request (CMR) is submitted via X12's online CMR form. Requests may be presented by the public, by an X12 member representative, or on behalf of an X12 group.

CMRs are not subject to ballot, instead the outcome is determined based on the following review and comment process.

## 4.1 ASC Review Period

Each CMR is subject to an ASC review period, conducted as follows.

1. Staff administers a 21-day CMR review period.
2. Staff provides X12J with a summary of the CMRs included in the review period and any associated comments.
3. Staff adds finalization of the review period CMRs to an X12J agenda.

## 4.2 CMR Determination

X12J is responsible for the final determination of each CMR including any necessary coordination between the subcommittees. Other subcommittees may be consulted on a specific CMR, but X12J retains final authority.

Depending on the comments received, X12J may table a CMR and refer the CMR to one or more subcommittees for additional discussion or a recommendation. Each consulted subcommittee evaluates the referred CMR and takes action as necessary to formulate a subcommittee recommendation to be reported at the next X12J meeting. To ensure timely processing of CMRs, X12J shall act on the CMR prior to the adjournment of the next scheduled X12J meeting.

The determination of CMRs occurs in this order:

1. X12J reviews each CMR listed in the summary and chooses one of the following actions:
  - a. Approves the CMR as submitted.
  - b. Approves the CMR with modifications.
  - c. Accepts withdrawal from the submitter and closes the CMR.
  - d. Disapproves the CMR with reasons and closes the CMR.
  - e. Refers the CMR to one or more subcommittees other than X12J.
2. Staff processes the X12J decisions.
3. Staff adds due process confirmation of finalized CMRs (approvals, disapprovals, and withdrawals) to a PRB agenda.

### 4.3 Technical Correction after X12J Approval

If a technical inaccuracy is discovered after X12J approval of a CMR, the X12J chair is authorized to act on behalf of the subcommittee and instruct staff to correct the technical inaccuracy. Technical inaccuracies include semantic or syntax rule conflicts, data attribute conflicts, and non-substantive typographical or grammatical errors missed during the CMR determination process.

This correction process shall not otherwise be used to circumvent the defined review and determination process. The X12J chair shall email correction instructions to [tassecretary@x12.org](mailto:tassecretary@x12.org), copying [ascchair@x12.org](mailto:ascchair@x12.org) and [prbchair@x12.org](mailto:prbchair@x12.org). Any questions or concerns related to the correction instructions shall be resolved between the X12J chair, PRB chair, and Steering chair, with the X12 Executive Director as advisor. Such corrections are permitted for thirty (30) calendar days after the first distribution of the revised code list. After that time, a correction shall be processed via a new CMR or maintenance request.

### 4.4 PRB Publication Determination

If there is disagreement on any procedural aspect related to a CMR or a set of CMRs, the objecting party must convey this objection to PRB prior to the vote confirming CMR due process.

PRB reviews the CMR process flow to ensure documentation is complete and applicable procedures were followed. If required documentation is missing or incomplete for one or more individual CMR, PRB has the option to disapprove publication of the specific CMR(s), not the full set. PRB may disapprove publication of the full set of CMRs based on a due process issue with the review period or another all-encompassing issue.

Following the review, PRB takes one of the following actions.

- A. Approve publication of the revised codes.
  - a. Staff processes the approval and publishes the revised code lists.
- B. Disapprove publication of the revised codes based on due process errors.
  - a. PRB documents the procedural violation and directs staff on the next step to be taken or refers the CMR back to X12J for resolution.

## 5 The Maintenance Process

This section defines procedures for maintenance requests related to components of the EDI Standard other than internal code lists and maintenance requests related to technical reports.

## 5.1 Extraordinary Situations

Although not likely, at any point during the process defined in this section, the developing subcommittee may find itself unwilling or unable to complete the maintenance activities for a specific maintenance request. In such a situation, the subcommittee may choose to ask PRB to take one of the following actions.

- A. Cancel the maintenance request based on a compelling statement of why the request was or has become inappropriate based on the criteria established in section **2.1.1 PRB Evaluates the Request**. A request to cancel the maintenance request is not based on an evaluation of the technical or business merits of the request or any disagreement with the stated need. It must be based on a high-level evaluation of the appropriateness of the request and initial assignment in relation to various X12 purpose and scope assignments and products.
- B. Reassign development responsibility to another subcommittee based on the subcommittee's inability to complete the development activities or inability to complete them timely.

To petition PRB to take either action:

1. The project delegate emails [support@x12.org](mailto:support@x12.org), notifying staff of the request to cancel the maintenance request or to request its reassignment.
2. Staff processes the notice and informs the PRB chair of the request.
3. The PRB chair either initiates an iMeet discussion of the request or requests staff add the item to the next PRB agenda.
4. Following discussion via iMeet or at a meeting, PRB either cancels or reassigns responsibility for the maintenance request. PRB cannot compel an unwilling subcommittee to continue as the developing subcommittee.
5. Staff puts the PRB decision into action.

A second extraordinary situation is invoked at any point during the process defined in sections 4 through 6 herein if any X12 member representative notifies the PRB chair at [prbchair@x12.org](mailto:prbchair@x12.org) of any substantive concern significant enough to disrupt the development process. Such a notification must be received prior to the PRB vote recommending publication.

If the PRB agrees that the concerns are substantive enough to disrupt the development process, PRB:

1. Notifies the project delegate of the reported concern.
2. Investigates the situation to determine the facts and evaluate the activities and actions.
3. Decides on an action based on the investigation.
  - a. Finds no substantive issue has occurred.
  - b. Finds a due process issues has occurred and remand the work to the

- appropriate procedural step.
- c. Finds a technical issue has occurred and remand the work for technical correction.
4. Communicates the decision to the ASC chair, staff, the project delegate, and the reporting member representative.

## 5.2 Subcommittee Considers the Request

The developing subcommittee considers the business case or justification for the request and any related public input received, then conducts the analysis necessary to decide to draft a proposal to satisfy the request or to disapprove the request.

The developing subcommittee, or its subordinate group delegated responsibility for the request, shall begin their deliberation based on the position that any presented business case or justification represents a legitimate business need. A disapproval decision shall be based on compelling evidence that the requested revision does not represent an accepted best practice, would “break” X12’s syntax or semantic rules or definitions, or would otherwise negatively impact the EDI Standard. An assessment that the current install base would or might be inconvenienced if the requested revision were to be implemented is not grounds for disapproving an otherwise sound request.

Once the analysis and evaluation are complete, the developing subcommittee shall either vote to disapprove the request or shall develop the associated revision proposal. Herein the term “proposed revisions” shall include both revisions to currently published products and the entire content for new work products.

In the case of disapproval, proceed to **5.3 Subcommittee Disapproves the Request**. Otherwise, proceed to **5.4 Subcommittee Develops Proposed Revisions**.

## 5.3 Subcommittee Disapproves the Request

If the developing subcommittee acts to disapprove the request, the following occurs:

- The project delegate shall record the date and results (disapproval) of the subcommittee ballot in the maintenance request system, noting for the record that quorum was achieved. It is not necessary to record the voting tallies.
- The project delegate shall update the maintenance request system with a statement of the subcommittee’s reason(s) for disapproving the request. This statement shall be the basis for the response to the submitter noted in section **5.3.1 PRB Reviews the Disapproval**.
- The project delegate informs the subcommittee’s X12J representative of the disapproval.

### 5.3.1 PRB Reviews the Disapproval

PRB shall review the developing subcommittee's decision to disapprove the maintenance request as follows:

- Staff shall notify PRB of the developing subcommittee's disapproval via a new iMeet voting thread (poll). The motion and voting options are based on the reason for the disapproval and any suggestion from the developing subcommittee.
- PRB constituents have five (5) calendar days from the date the poll is posted to post their vote on the matter.
- When the voting period ends, the PRB chair shall confirm the outcome of the PRB ballot and the final determination on the status of the MR.
- Staff shall update the maintenance request system to reflect the date of the PRB decision, the decision, and note that quorum was achieved.
- If the disapproval is confirmed, staff notifies the submitter of the disapproval and the reason(s) therefore.

## 5.4 Subcommittee Develops Proposed Revisions

The developing subcommittee drafts instructions for the proposed maintenance in accordance with policies, procedures, control and guidance documents, and design rules applicable to the specific product being revised or developed. This includes confirming the products listed in the impact assessment and documenting each proposed revision to each impacted product. These instructions are documented in the maintenance request's impact assessment.

In accordance with section **1.2 Authority** above, an ASC subcommittee may establish a subcommittee-specific workflow defining its specific steps. However, any subcommittee-level governance shall be clear, concise, and structured to avoid bureaucracy and ensure the subcommittee's development process facilitates the corporate timeliness parameters. For the most part, a subcommittee's supplemental workflow should accommodate a six (6) month timeline; for complex requests the timeline may extend to nine (9) months.

Depending on the products impacted, the developing subcommittee may need to collaborate with another subcommittee or to delegate responsibility for part of the impact and revision analysis to another subcommittee. This cross-subcommittee work shall be completed in a cooperative and timely manner. The developing subcommittee retains responsibility for ensuring the maintenance request progresses timely. If at any time the request ceases to move forward timely, the project delegate shall cooperatively work with their subcommittee chair, the other subcommittee's chair, the ASC chair, X12J chair, and others as necessary to resolve the issue(s) or create an alternative path forward to ensure the maintenance request is not stalled.

The developing subcommittee may seek technical assistance from X12J or X12C during development and may request an informal X12J or X12C review to discuss potential technical issues at any time. In one case, the project delegate works with the subcommittee's X12J representative who coordinates the collaboration between the subcommittee and X12J. In the other case, the project delegate coordinates with the X12C chair. In either case, staff assists with the coordination as requested.

Once the developing subcommittee completes instructions for the proposed revisions as described in the sub-sections below and finalizes the impact assessment, the project delegate composes a brief, high-level, "in English" summary of the benefit to be achieved via implementation of the revisions identified to satisfy the maintenance request and enters it in the maintenance request system. This brief statement should not exceed three sentences and will be the basis for X12 informational and educational materials and change summaries. Staff may adjust the statement later to address grammar, consistency, or other stylistic matters. Once the summary statement is entered, the project delegate is responsible for ensuring a subcommittee ballot is conducted timely.

### **5.4.1 Reviewing the Impact Assessment**

Each maintenance request assigned to a developing subcommittee includes an initial impact assessment prepared by staff as part of the advance analysis of the request. The initial impact statement records the X12 products thought to be impacted by the maintenance request and, if appropriate, the individual references within each product that may be subject to revision. When the developing subcommittee completes its work, the final impact analysis contains the detailed instructions for revisions based on the maintenance request and is the basis of all votes on the maintenance request from this point forward. The final impact analysis is also the basis for revisions based on an eventual PRB approval to publish, should approval be the outcome of section **6 Committee Ballot**.



The developing subcommittee reviews the initial impact assessment prepared by staff. At this time, or at any point during the maintenance process prior to section **5.6 Interested Subcommittees Review & Ballot**, the project delegate revises the impact statement as necessary for completeness and accuracy, including adding additional impacted products or instances and updating proposed instructions and other notes.

### **5.4.2 Developing Proposed Revisions**

The developing subcommittee finalizes the maintenance request's impact assessment by completing instructions for all proposed revisions. The final impact assessment shall clearly articulate all required revisions to each X12 product impacted by the maintenance request. The impact statement shall serve as supporting information for balloting and publisher instructions for any approved maintenance request.

## **5.5 Subcommittee Ballot on Proposed Revisions**

Once the developing subcommittee has completed its activities related to the maintenance request, a subcommittee ballot is conducted.

The project delegate and staff coordinate as follows:

1. The project delegate emails support@x12.org, courtesy copying the subcommittee's primary X12J representative, advising that the maintenance request is ready for subcommittee ballot and requesting a final version of the impact assessment, the MR's benefit summary statement, or both as supporting material for the ballot.
2. Staff updates the maintenance request system as necessary.
3. Staff provides the project delegate with the requested supporting material for the developing subcommittee's ballot on the maintenance request.
4. The project delegate reviews the supporting material for accuracy and completeness.

If the subcommittee conducts a meeting vote on the maintenance request:

1. The project delegate coordinates with the subcommittee chair on the ballot logistics.
2. When voting is complete, the project delegate records the date and results of the subcommittee ballot in the maintenance request system, noting for the record that quorum was achieved. The voting tallies are not recorded. The project delegate also notifies staff of the results.

If the subcommittee conducts an electronic vote on the maintenance request:

1. The project delegate coordinates ballot details with the subcommittee chair.

2. The committee chair requests that staff administer a subcommittee ballot on the maintenance request.
3. When voting is complete, staff records the decision date and the results of the subcommittee ballot in the maintenance request system, noting for the record that quorum was achieved. The voting tallies are not recorded. Staff also notifies the project delegate and subcommittee chair of the results.

If the maintenance request is disapproved, the proposed revisions are remanded to the subcommittee for additional review, revert to **5.5 Subcommittee Develops Proposed Revisions**.

If the maintenance request is approved, the proposed revisions move forward to X12J for technical review.

1. The project delegate provides a courtesy notice of the approval to the subcommittee's X12J representative.
2. Staff notifies the X12J chair and constituents that the maintenance request has been moved forward by the developing subcommittee and provides the supporting material included in the subcommittee's ballot for X12J review.
3. Staff adds the maintenance request to the next X12J agenda, initiating the activities defined in section **5.7 X12J Reviews Proposed Revisions**.

## 5.6 X12J Reviews Proposed Revisions

It is each X12J constituent's responsibility to review the maintenance request and proposed revisions for technical accuracy in a timely manner. The X12J constituents who represent an ASC subcommittee either speak on behalf of their subcommittee unilaterally or they coordinate a subcommittee-level review of the MR and proposed revisions so they can speak on behalf of the subcommittee at the next X12J meeting.

X12J completes a technical review of the proposed revisions and acts on the matter at their next scheduled meeting.

The purpose of the X12J technical review is to ensure that the proposed revisions materially meet the technical parameters of the maintenance request approved by PRB and adhere to the control standards and design rules applicable to the specific product(s) being revised. Based on the technical review, X12J votes to either recommend the proposed revisions for ballot or to remand the proposed revisions to the developing subcommittee for additional action. The X12J chair is responsible for ensuring these activities are conducted in a timely manner, usually within three months of receipt of the proposed revisions.

A vote to remand must be based on one of the following technical issues and must include a detailed explanation of the specific technical issue(s) and a remedy that would resolve the technical issue(s).

- The proposed revisions are not aligned with the technical parameters of the approved maintenance request.
- The proposed revisions constitute a clear violation of applicable control standards and/or design rules.

Once X12J acts on the maintenance request:

- Staff records the date and results of the vote in the maintenance request system, noting for the record that quorum was achieved. The voting tallies are not recorded.
- If X12J votes to recommend the proposed revisions for ballot, the proposed revisions are moved forward to PRB for due process review in accordance with **Section 5.10 PRB Authorizes Ballot**.
- If X12J votes to remand the proposed revisions to the developing subcommittee for additional action, proceed to **5.7 X12J Remands the Proposed Revisions**

If the X12J constituents are unable to achieve a majority decision on action to advance the work or action to remand the work after a good-faith effort, the X12J chair shall mediate to cooperatively resolve the differences between the X12J constituents. If the X12J chair's efforts do not result in resolution, the X12J chair shall request the ASC chair mediate with the ASC subcommittee chairs to cooperatively resolve the differences between the subcommittees. If the subcommittees remain in a stalemate based on differences that cannot be resolved to the mutual satisfaction of those impacted, the X12J chair shall seek a decision based on a majority of the X12J Type 1 constituents. If the X12J Type 1 constituents are unable to achieve a majority decision, the X12J chair and ASC chair may jointly determine to move the developing subcommittee's approved draft forward for committee ballot so the ASC constituents can resolve the matter with a direct vote. In this situation, the proposed revisions are moved forward to PRB for due process review in accordance with section **5.11 PRB Authorizes Ballot**.

## 5.7 X12J Remands the Proposed Revisions

If X12J votes to remand the proposed revisions to the developing subcommittee for further action, the following steps are completed.

1. X12J creates a detailed explanation of the specific technical issue(s) and recommends a remedy that would resolve each technical issue.
2. Staff records the X12J explanation and recommendation in the maintenance request system.
3. The developing subcommittee's X12J representative communicates the X12J reasoning to the project delegate, initiating the activities defined in **5.8**

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## Subcommittee Considers X12J's Explanation.

### 5.8 Subcommittee Considers X12J's Explanation

The developing subcommittee considers X12J's explanation of the technical issues and alternative suggestion and acts on the matter. The subcommittee is not obligated to follow the X12J recommendation. After considering the information, the developing subcommittee makes revisions in accordance with the X12J assessment or prepares counter-arguments to rebut the X12J assessment and conducts a subcommittee ballot on the matter. The subcommittee may choose to revise some items and rebut others by conducting separate ballots on the items. A subcommittee decision to rebut the X12J assessment must be approved by a two-thirds supermajority. Depending on the type of ballot executed, either the project delegate or staff records the date and results of the vote in the maintenance request system, noting whether quorum was achieved. The voting tallies are not recorded.

If the subcommittee's proposed revisions are revised based on the X12J assessment, the revised proposed revisions move back to X12J for technical review. Revert to section **5.7 X12J Reviews Revised Proposed Revisions**.

If the subcommittee votes to rebut the X12J assessment with counter-arguments, the following occurs.

1. The subcommittee creates a detailed rebuttal of the specific technical issues, remedies, or alternative suggestions documented in X12J's explanation.
2. The subcommittee's project delegate enters the rebuttal into the maintenance request system and provides a courtesy copy of the rebuttal to the subcommittee's X12J representative.
3. Staff distributes the rebuttal to the X12J chair and X12J constituents.
4. Staff adds the maintenance request to a X12J agenda, proceed to **5.10 X12J Considers Subcommittee Resolution**.

### 5.9 X12J Considers Subcommittee Resolution

Following subcommittee rebuttal of X12J recommendations, X12J conducts another vote on the proposed work product(s).

If X12J accepts the Subcommittee's rebuttal:

- X12J votes to recommend that PRB approve the proposed maintenance request for ballot.
- Staff records the date and results of the vote in the maintenance request system, noting for the record that quorum was achieved. The voting tallies are not recorded.
- Staff places the item on a PRB agenda, proceed to section **5.10 PRB**

## Authorizes Ballot

If X12J confirms their technical disapproval with a three-quarters (3/4) approval vote, the stalemate shall be resolved via the committee ballot on the matter. The committee ballot materials shall fully describe the stalemate so that the ASC constituents can decide the matter directly. Proceed to section **5.10 PRB Authorizes Ballot**.

## 5.10 PRB Authorizes Ballot

Staff creates a report of the maintenance request's voting history and any other procedural information from the maintenance request system and distributes it to the PRB constituents via iMeet.

Any complaint or question about a procedural aspect of the proposed work product must be conveyed to the PRB prior to the vote authorizing the maintenance request for ballot. Such a complaint must be presented to the PRB chair via email to [vicechair@x12.org](mailto:vicechair@x12.org) at least 24 hours before the PRB vote is scheduled to occur.

PRB takes one of the following actions:

- A. PRB confirms due process and approves the maintenance request for ballot. Proceed to **Section 6 Committee Ballot**
- B. PRB finds a procedural violation has occurred and determines where in the process the procedural violation occurred. PRB instructs the developing subcommittee to revert to that step in the process and resolve the procedural issue(s).

Staff records the date and results of the vote in the maintenance request system, noting for the record that quorum was achieved. The voting tallies are not recorded. If the request was remanded, staff notes the details in the maintenance request system and notifies the project delegate of the decision and next steps.

## 6 Committee Ballot

Staff prepares and distributes a committee-level technical ballot in accordance with the **X12 Bylaws (CAP01)** and the **ASC Operating Manual (ASC01)**.

Any member's primary representative with a due process concern related to the ballot wording or supplemental materials shall notify staff of the concern via an email to [support@x12.org](mailto:support@x12.org) before the end of the voting period. Staff forwards such concerns to the PRB chair, due to time sensitivity the PRB chair shall act on behalf of the PRB. If the PRB chair agrees the concerns are substantive enough to invalidate the ballot, the PRB chair shall notify the ASC chair at [ascchair@x12.org](mailto:ascchair@x12.org) and the Executive Director at

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[executivedirector@x12.org](mailto:executivedirector@x12.org) of the decision and the ballot shall be invalidated.

## 6.1 Evaluate Ballot Results

Once the ballot closes, results and comments shall be processed as follows.

1. Staff tallies the ballots in accordance with corporate and committee policies and records the date and results of the vote in the maintenance request system, noting for the record that quorum was achieved. The voting tallies are not recorded.
2. If quorum was not attained:
  - a. Staff invalidates the ballot and notifies the PRB chair and ASC chair.
  - b. The ASC chair and PRB chair shall determine whether to re-ballot the matter. At the officer's discretion, they may choose to request feedback or a recommendation on next steps from one or more X12 subcommittees.
3. If quorum was attained and the ballot was approved:
  - a. Staff places the item on the next PRB agenda.
  - b. Staff creates a report of the maintenance request's voting history and any other procedural information from the maintenance request system and distributes it to the PRB constituents via iMeet.
  - c. Proceed to section **6.2 Distribute Ballot Comments**
4. If the quorum was attained and the ballot was disapproved:
  - a. Staff notifies the PRB chair and ASC chair.
  - b. Staff notifies the project delegate of the developing subcommittee.
  - c. Staff forwards any technical comments to the developing subcommittee project delegate.
  - d. The developing subcommittee reverts to section **5.4 Subcommittee Develops Proposed Revisions**.

## 6.2 Distribute Ballot Comments

Staff processes any ballot comments as described below. Comments that accompany a disapproval vote require a response, which the voter must receive within four months (approximately 16 weeks) of the ballot closing date. Staff is responsible for monitoring the timeliness of responses and shall notify the ASC and PRB chairs if timeliness becomes a concern.

If any ballot comments describe a concern that might be cause for the ballot to be invalidated, staff shall immediately notify the ASC and PRB chairs of the concern(s). If, in the opinion of the ASC and PRB chairs, the concern(s) are likely valid and may require the ballot be invalidated, the ASC chair brings the matter to Steering for formal action. If Steering acts to invalidate the ballot, the ASC chair shall notify staff of the decision, and an announcement of the invalidation shall be distributed to all committee constituents. No further action shall be taken related to the invalidated ballot. A new ballot on the matter may be issued later, depending on the specifics of

the situation.

If there are any ballot comments based on a technical issue or concern, they are processed in accordance with section **6.3 Process Technical Comments**.

If there are any administrative comments (any comment not based on a technical concern), they are processed in accordance with section **6.4 Process Administrative Comments**.

## 6.3 Process Technical Comments

Any ballot comment based on a technical issue or concern are processed as follows:

1. Staff notifies the developing subcommittee's project delegate and X12J representative of the technical comment(s).
2. The developing subcommittee's project delegate and X12J representative draft a response to each technical comment.
3. The developing subcommittee's X12J representative presents the draft response(s) for action via an iMeet thread or at the next X12J meeting.
4. X12J shall approve a response to each technical comment within 14 weeks of the ballot closing date.
5. Staff prepares the formal response and distributes it to the voter within 4 months of the ballot closing date.

## 6.4 Process Administrative Comments

Any ballot comment based on an issue or concern not related to a technical matter is processed as follows:

1. Staff notifies the ASC chair and X12 executive director of the comment(s).
2. The ASC chair and X12 executive director draft a response to each administrative comment.
3. Staff prepares the formal response and distributes it to the voter within 4 months of the ballot closing date.

## 6.5 Final PRB Review

After the committee ballot on the maintenance request closes, PRB reviews all activity since it approved the committee ballot on the maintenance request to ensure due process was followed.

If due process is confirmed:

1. PRB votes to approve publication of the revisions described in the maintenance request.
2. Staff records the date and results of the vote in the maintenance request system, noting for the record that quorum was achieved. The voting tallies are

not recorded.

3. Staff takes all actions necessary to finalize and publish the approved revisions.

If due process is not confirmed:

1. PRB votes to invalidate the ballot and remand the work to the appropriate procedural step group based on where the procedural violation occurred.
2. Staff records the date and results of the vote in the maintenance request system, noting for the record that quorum was achieved. The voting tallies are not recorded.
3. Staff notifies the project delegate of the invalidation and instructs the project delegate on next steps.

## 7 Late Stage Corrections

Infrequently, content, style, or formatting issues are discovered after PRB approval for a committee ballot on a maintenance request and publication of the revisions approved via the maintenance request. Such issues shall be handled as detailed in this section.

### 7.1 Minor Corrections

At any time during the period between PRB approval for a committee ballot on the maintenance request and PRB's final confirmation of due process, staff or an X12 member representative may identify a minor mistake in a revision proposed on the maintenance request. If such a minor mistake is noted during the defined period, the developing subcommittee's project delegate shall notify staff of the mistake and a suggestion for remedial action via email to [support@x12.org](mailto:support@x12.org). Staff shall obtain concurrence that the mistake is minor and should be corrected from the ASC, PRB, and developing subcommittee chairs. If concurrence is given, staff shall correct the minor mistake as a general housekeeping action at the next opportunity. Examples of minor errors include misspellings, grammatical errors, and formatting issues. An error that affects the contents of an EDI message or the conditions under which content is transmitted between trading partners is never considered minor and shall not be addressed or corrected via these housekeeping steps.

### 7.2 Corrections after Committee Ballot Approval

At any time during the period between PRB approval of a committee ballot on the maintenance request and PRB approval to publish, the developing subcommittee or a subcommittee recognized as an interested in the maintenance request may identify an error in a revision proposed on the maintenance request.

Upon identification of such an error, the developing subcommittee's project delegate or the chair of an interested subcommittee notifies staff at [support@x12.org](mailto:support@x12.org) and the



subcommittee's PRB representative that one or more errors have been identified, classifying each as substantive or not, and providing a suggested remedial action.

1. Staff apprises the ASC and PRB chairs of the situation.
2. The PRB chair initiates discussion of the matter via iMeet or at a meeting.

Following discussion, PRB acts on the matter in accordance with the following:

1. If the ballot has concluded and was disapproved, no further action is needed.
2. If the ballot has not concluded, PRB considers the error(s) and recommendation as part of its due process review.
  - a. If the error is not technical in nature, PRB shall decide whether the error should be corrected prior to publication or later via a separate maintenance request. This decision shall be made within fourteen (14) calendar days. PRB shall then provide appropriate instructions on the matter to staff and the developing subcommittee's project delegate.
  - b. If the error is technical in nature, PRB shall consult with the X12J chair acting on behalf of the X12J subcommittee on the matter and then decide whether the error should be corrected prior to publication or later via a separate maintenance request. This decision shall be made within twenty-one (21) calendar days. PRB shall then provide appropriate instructions on the matter to staff and the developing subcommittee's project delegate.
  - c. If the error is technical in nature, and the X12J chair chooses not to act on behalf of the X12J subcommittee on the matter, the error shall be corrected later via a separate maintenance request. This decision shall be made within fifteen (14) calendar days. PRB shall then provide appropriate instructions on the matter to staff and the developing subcommittee's project delegate.

### **7.3 Corrections after Approval to Publish**

Rarely, content issues that would negatively impact implementers or create a barrier to successful implementation are discovered after the revisions identified on a maintenance request have been approved for publication. In such cases, it may be in the best interest of the X12 organization and current and future implementers to address the problem quickly and efficiently. Evaluation of content issues is limited to three periods following approval,

- Prior to the revised product being published and available
- After the revised product is published and available but prior to any implementer having access to the revised product
- Within sixty (60) calendar days of the first access to the revised product.

Content issues identified more than 60 calendar days after the first distribution of the work product are not correctable via these procedures but instead shall be treated as normal maintenance in a future maintenance cycle.

This section defines the conditions and processes that generally govern such corrections. However, it is acknowledged that detailed quantification of all possible content issue scenarios is impossible and as such, the spirit of these conditions and processes shall be honored in any scenario not specifically detailed herein.

Within five (5) calendar days of notification of such a content issue, the ASC chair, and PRB chair shall evaluate the reported content issue(s) and come to agreement on whether each issue is a technical issue, a non-technical substantive issue, or a non-technical non-substantive issue. A description and examples of each type of issue are included below, however the information is not intended to represent a comprehensive list of potential issues, it is for clarification of intent.

- Technical issues include those related to data attributes, syntax requirements, or semantic requirement. For example, approving a new three-character code for a two-character data element.
- Non-technical substantive issues include usage instructions, notes, or situational rules that are technically accurate but do not reflect the intended implementers business needs. For example, a comment on a date data element telling implementers to send an identification number in the date field or a TR3 situational rule stating that a data element is required for a certain business use when in fact that data element is not applicable for that business use.
- Non-technical non-substantive issues such as grammatical errors, formatting issues, and other items not related to the technical accuracy of the published work.

### **7.3.1 Technical and Non-technical Substantive Issues**

Technical inaccuracy in final products is of grave concern as the consequences of publishing technically inaccurate products are significant for both X12 and implementers. In some cases, it is possible to correct the technical inaccuracy without negatively affecting the intended solution. In the above example, replacing the new 3-character code with a technically accurate 2-character code solves the technical issue without negative consequences.

Non-technical substantive issues are also of grave concern and are most often related to inaccurate instructions related to a data element, segment, or transaction set. It is not likely that such issues can be corrected without additional member representative input although such correction may rarely be possible.

Technical inaccuracies and non-technical substantive issues shall be

processed as follows.

1. A representative panel shall consider the facts of the matter, the interests of various parties, the implications and potential impact of various next actions, and other pertinent information and decide on the matter. The representative panel shall consist of
  - a. The PRB chair acting on behalf of the PRB
  - b. The X12J chair acting on behalf of X12J
  - c. The ASC chair acting on behalf of the ASC stakeholders
  - d. The executive director acting on behalf of X12
2. Within five (5) days of the determination of the type of the issue(s), staff shall provide an assessment of the issue(s), including a recommendation to the panel.
3. Within seven (7) days the panel shall reach a decision on the matter from among the following options or another similar option.
  - a. If the content issue(s) will be corrected in the revised product, the X12J chair confirms the correction(s) to be applied. Staff applies the correction(s) and notifies any customer who accessed the tainted product of the situation, the correction, and any next steps.
  - b. If the issue will not be corrected and implementers do not yet have access to the tainted product, the panel shall determine whether to invalidate the ballot or proceed with publication without correction of the error(s) and provide appropriate instructions on next steps to staff.
  - c. If the issue will not be corrected and implementers already have access to the tainted product, the panel shall ensure a maintenance request addressing the error is submitted within ten (10) days, that an RFI, best practice paper, or other work-around instructions are published as soon as possible, clarifying what implementers should do until the next version of the product is published, that implementers who have accessed the tainted product are notified of the situation and any next steps, and that anyone who accesses the tainted product in the future is notified of the situation and expected remediation.
4. Once the matter is resolved,
  - a. The ASC chair shall inform Steering of the situation
  - b. The X12J chair shall ensuring the X12J review process is enhanced to ensure similar technical issues are identified timely in the maintenance process
  - c. The PRB chair informs PRB of the situation
  - d. Staff updates the maintenance request system to ensure the details of the matter are accurately recorded.

### 7.3.2 Non-technical Non-substantive Issues

While non-technical, non-substantive issues are not necessarily a barrier to implementation, X12 work products typically have a long life-cycle and correcting known issues prior to significant dissemination of the work product may prevent significant costs and inefficiencies over time.

Non-technical, non-substantive issues shall be processed as follows.

1. The PRB chair shall act on behalf of the PRB.
2. The ASC chair shall act on behalf of the ASC stakeholders.
3. Within five (5) days of the determination of the type of the issue(s), staff shall provide an assessment of the issue(s), including a recommendation.
4. The ASC and PRB chairs shall evaluate the assessment, recommendation, and any supporting documentation necessary to reach a decision on whether the tainted product will be corrected or whether the matter will be addressed in the next version of the product via a maintenance request or housekeeping activity.
5. Once a decision is reached, the ASC chair shall provide appropriate instructions on next steps to staff
6. Once the matter is resolved,
  - a. The ASC chair shall inform Steering of the situation
  - b. Staff updates the maintenance request system to ensure the details of the matter are accurately recorded.

## 8 Developing an Interpretation

An interpretation is an official explanation or clarification related to the use of an X12 work product. An interpretation is developed in response to a request for an interpretation submitted by any party and is intended to ensure the proper use of the EDI Standard or to increase consistency between implementations.

There are two types of interpretations, formal and informal. Formal interpretations represent the position of the X12 organization. They are developed by a subcommittee and approved at several organizational levels. Informal interpretations are developed and approved by a subcommittee and represent the subcommittee's position on the matter.

Interpretations are not the appropriate vehicle for requesting a revision to a work product. An RFI that is determined to be a request for a revision is closed without a response and is not presented for public viewing. If an RFI is closed for this reason, the submitter is notified that revision requests are correctly presented via X12's online suggestion form.

If the approved interpretation illuminates a need to revise a work product, the responding

subcommittee shall submit a corresponding suggestion via X12's online form.

## 8.1 Processing the Request

When an RFI is presented to X12, the following process shall apply. At any time during the interpretation development process, the project delegate may work with staff to contact the submitter for additional information or clarification.

1. Staff vets the RFI to ensure it is clearly articulated and presents a question on the proper use or meaning of an X12 product. This may include contacting the submitter.
  - a. If the request is clearly Form Spam staff deletes it and no further action is taken. Form Spam is defined herein as an online form completed and submitted with irrelevant or fake information by a scammer or other type of hacker, often using an automated bot.
  - b. If the submitted request cannot be clarified because the submitter does not respond to staff's communications, the RFI is updated to reflect the non-response and no further action is taken.
  - c. If staff confirms via email or phone conversation with the submitter that the RFI does not represent a question related to the meaning or use of an X12 product, the RFI is updated to reflect that it is not a valid RFI and no further action is taken.
  - d. If the RFI is successfully vetted, it continues to follow this process.
2. If the RFI was submitted for an informal interpretation and the RFI is specific to the interests of one ASC subcommittee, the informal designation stands. However, if the RFI was submitted for an informal interpretation and the RFI impacts more than one ASC subcommittee, the RFI shall be reclassified as a request for a formal interpretation to ensure all interests are considered.
3. staff assigns responsibility for developing the interpretation to an ASC subcommittee based on the subject matter of the RFI. The assigned subcommittee is referenced herein as the responding subcommittee. In all cases, only one subcommittee shall be assigned as the responding subcommittee. If a subcommittee has established a subordinate group with specific responsibility for its RFIs, staff assigns the subordinate group's chair or co-chair as the RFI's project delegate. Otherwise, staff assigns the subcommittee's PRB representative as the RFI's initial project delegate.
4. Staff informs PRB of the RFI and initial assignment via an iMeet thread.
5. PRB evaluates the RFI and initial assignment via iMeet discussion. If PRB does not act to deny or reassign the RFI by a majority vote within ten (10) calendar days of the initial posting in iMeet, the RFI is accepted and the assignment is approved. The PRB chair may call for an abbreviated review period if necessary to ensure timely RFI assignment. Unless a subcommittee primary representative posts an objection to the abbreviated review period within 48 hours of notice of the abbreviated review, the abbreviated review

period will be honored.

- a. The primary PRB representative of a subcommittee other than the assigned subcommittee may post a comment in the iMeet thread noting their subcommittee's material interest in the RFI during the review period.
  - b. If PRB determines that more than one ASC subcommittee has a material interest in an informal interpretation request, PRB reclassifies the request as formal to ensure all interests are considered.
  - c. PRB has the option of reassigning the responding subcommittee by majority vote or a general consent motion. If PRB reassigns the RFI, the new responding subcommittee's primary PRB representative is assigned as the project delegate.
6. If no PRB constituent posts a comment noting a concern, question, or dispute related to the appropriateness of RFI or its initial assignment by the close of the review period, the RFI is accepted and the assignment is final.
  7. The project delegate of record may reassign the project delegate responsibilities at any time during the interpretation development process using this online [form](#) found on X12.org/resources/forms.
  8. The project delegate shepherds the RFI through the interpretation development process.
  9. The responding subcommittee develops an interpretation in response to the RFI.
    - a. If the request is designated as an informal, proceed to section **7.2 Informal Interpretation**.
    - b. If the request is designated as a formal interpretation, proceed to section **7.3 Formal Interpretation**.

## 8.2 Informal Interpretation

The process for developing an informal interpretation is as follows.

1. The responding subcommittee develops and approves an interpretation. In accordance with section **1.2 Authority** above, an ASC subcommittee may establish a subcommittee-specific workflow defining its specific steps. However, any subcommittee-level governance shall be clear, concise, and structured to avoid bureaucracy and ensure the subcommittee's development process can be conducted in three (3) months or less to facilitate the corporate timeliness parameters.
2. The project delegate informs staff of the approval using this online [form](#) found on X12.org/resources/forms.
3. Staff applies formatting, style, and grammatical revisions to the interpretation, as necessary. This version is the final interpretation.
4. Staff documents the actions, status, and final interpretation in the RFI tracking system and updates the public RFI webpage.

5. Staff notifies the submitter of the outcome.

### 8.3 Formal Interpretation

The process for developing a formal interpretation follows. At any time during the formal interpretation development process, a materially impacted party may convey a procedural objection for PRB consideration by emailing [prbchair@x12.org](mailto:prbchair@x12.org).

1. The responding subcommittee develops and approves a recommended interpretation. In accordance with section **1.2 Authority** above, an ASC subcommittee may establish a subcommittee-specific workflow defining its specific steps. However, any subcommittee-level governance shall be clear, concise, and structured to avoid bureaucracy and ensure the subcommittee's development process can be conducted in six (6) months or less to facilitate the corporate timeliness parameters.
2. The project delegate informs staff of the approval using this online [form](#) found on [X12.org/resources/forms](https://x12.org/resources/forms).
3. Staff applies formatting, style, and grammatical revisions to the recommended interpretation, as necessary.
4. Since a formal interpretation is the responsibility of, and is attributed to, the ASC chair, staff presents the recommended interpretation to the ASC chair for review.
5. The ASC chair reviews the recommended interpretation and has authority to make non-substantive presentation or wording revisions or to return the interpretation to the responding subcommittee for further refinement.
6. Staff creates a discussion thread in X12J's iMeet workspace and posts the request and recommended interpretation.
7. X12J subcommittee primary representative(s) either act on behalf of their subcommittee or present the recommended interpretation to their subcommittee for review.
8. X12J acts on the recommended interpretation.
  - a. If all subcommittees either approve the recommended interpretation or abstain, this interpretation is final. Proceed to step 9 below.
  - b. If any subcommittee disapproves the recommended interpretation, X12J attempts to resolve the issue(s) causing the disapproval.
  - c. If the subcommittees cannot all agree on the recommended interpretation after discussion, the X12J constituents vote to determine the final interpretation by majority decision.
9. Staff documents the actions, status, and final interpretation in the RFI tracking system.
10. Staff creates a discussion thread in PRB's iMeet workspace.
11. PRB verifies due process via an iMeet discussion.
12. If PRB finds due process issues:
  - a. PRB remands the interpretation to the appropriate step of this section.

- b. Staff documents the action, reason(s), and status in the RFI tracking system.
13. If PRB confirms due process:
  - a. Staff documents the actions, status, and final interpretation in the RFI tracking system and updates the public RFI webpage.
  - b. Staff finalizes the formal response and distributes it to the RFI submitter. A formal interpretation developed within the ASC is presented as an official response from the ASC chair.

## 9 Modifying an Interpretation

Over the course of time X12 may need to revise (change) or retract (invalidate) a published interpretation. The following steps shall be taken to modify a final interpretation.

1. A subcommittee may at any time vote to petition that an interpretation be revised or retracted. A subcommittee shall only take such action related to an interpretation that it developed or to an interpretation related to a work product that it maintains.
2. Following subcommittee approval of such a petition, the subcommittee's PRB representative shall initiate the consideration process by submitting the [RFI Revision](#) form identifying the impacted interpretation, and detailing the requested action and the reason(s) supporting the action.
3. Staff documents the action in the RFI tracking system and notifies PRB of the matter via an informative iMeet post. PRB does not act on the petition at this time.
4. Staff creates a discussion thread in X12J's iMeet workspace.
5. If a subcommittee has a material interest in the petition, the subcommittee's X12J representative may post comments noting the subcommittee's opinion of the requested revision or retraction in the iMeet thread.
6. X12J acts on the petition.
  - a. If all subcommittees either approve the petition or abstain, proceed to step 7 below.
  - b. If any subcommittee disapproves the petition, X12J attempts to resolve the issue(s) causing the disapproval.
  - c. If all subcommittees cannot come to agreement after discussion, the X12J constituents vote to decide on the petition by majority decision.
7. Staff documents the actions in the RFI tracking system.
8. Staff creates a discussion thread in PRB's iMeet workspace.
9. PRB verifies due process via iMeet discussion.
10. If PRB finds due process issues:
  - a. PRB remands the interpretation to the appropriate step of this section.
  - b. Staff documents the action, reason(s), and status in the RFI tracking system.
11. If PRB confirms due process:
  - a. Staff updates the RFI tracking system.
  - b. If the petition is approved, staff updates the public RFI webpage according to the decision and posts a notice of the action on the X12 website.



## 10 Terminology

To ensure consistent use of terms, definitions, and acronyms across X12 products and activities, X12 maintains the **Wordbook**, a comprehensive corporate glossary. The included terms are either proprietary to X12, cite definitions published by another authority, or represent common terms and definitions that are relevant to X12's work. The terms and definitions defined in the **Wordbook** shall be used in X12 work products when applicable, without modification or revision. The **Wordbook** can be referenced online at [wordbook.x12.org](http://wordbook.x12.org)

## 11 Document History

New versions are effective on the approval date unless otherwise stated in the approval.

Date	Description
08/27/2021	V5p5: Revisions for clarity based on pilot experience.
10/30/2020	V5p4: Process clarifications based on pilot activities.
07/31/2020	V5p3: Minor corrections to sections 2, 4, 7, and 8.
07/20/2020	V5p2: Correct typo in section 2.2.
01/30/2020	V5p: Biennial review – add a process for revising an RFI response and other revisions based on member representative feedback and revisions to support the consolidation of X12's maintenance processes (aka Pilot 3 or ARC). This is a pilot version to guide the proof-of-concept pilot for ARC. Revision to support the pilot will be applied without an associated committee ballot. The subcommittee will ballot the pilot procedures when the pilot is completed.
05/31/2018	V4: Biennial review - reordered sections, revised to simplify instructions and processes, converted to new standard format & naming convention.
01/17/2015	V3: Revised to improve consistency, clarity, and process efficiency.
04/21/2011	V2: Significant revisions to OPM and SD2 to synchronize the documents, increase consistency, and reflect organizational changes.
07/22/2005	V1: Revisions related to Interpretations.