**ASC Administrative
Policy and Procedure**

ASC Request for Interpretation (RFI) Processing Manual

Procedures for Accepting and Responding to Requests for Interpretation Related to the EDI Standards and Related Technical Reports

(ASC04)

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1   Introduction

The Accredited Standards Committee (ASC) Steering Committee (Steering) is responsible for this policy and associated procedures. X12 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 via X12's online Feedback form.

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. Supplemental rules must 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 always prevails.

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)** and the **ASC Maintenance Request Processing Manual** (ASC02) establishes its policies and processes related to maintenance of X12's EDI Standard and related products. Unless otherwise specified herein, these rules stand alone and cannot be supplemented with additional rules. Any permitted supplemental governance must be reviewed by the P&P task group and posted on X12's publicly accessible policy and procedure web page.

3   Background

X12 maintains numerous standards and related products and makes them available to the public. A current product list is available on X12's website. Many of these products are maintained by the ASC. The policies and procedures governing the ASC's maintenance request processes are established in the **ASC Maintenance Request Processing Manual (ASC02)**.

Implementers and other users of X12 products occasionally have questions related to the proper use of the EDI Standard or a related technical report, including implementation

guides. To support these implementers and users, X12 publishes interpretations related to how its products are to be implemented and used. Each interpretation is a response to one or more questions posed in a Request for Interpretation (RFI). This governance, *ASC04*, establishes the ASC's specific Request for Information (RFI) policies and processes.

Within X12, the term "request for information process" covers activities related to accepting, assigning, analyzing, and responding to requests for clarification(s) related to X12 products including the EDI Standard, implementation guides, reference models, and clarification papers. When an X12 member's representative or member of the public has a question, they submit a request for interpretation, sometimes referred to more simply as the request or question. X12's response to the question is officially known as the interpretation but is sometimes referred to as a response or answer. The terms request for interpretation, request, and question are used interchangeably herein. Likewise, the terms interpretation, response, and answer are used interchangeably herein.

4   ASC04 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.

P&P reviews [ASC02](#) at least biennially to ensure the policies and procedures are written simply with an emphasis on clarity and accuracy. P&P will review ASC04 on the same schedule to ensure any related policies and procedures remain consistent between the two governance documents. Following P&P's approval of a revised draft, the draft is submitted to Steering with P&P's recommendation for action. Steering reviews the draft and either provides feedback to P&P on the revisions or approves the revisions.

5   Overview

An interpretation is an official explanation or clarification related to the use of an X12 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 an associated technical report or to increase consistency between implementations. An interpretation does not directly result in a revision to an X12 product but a corresponding maintenance request may be submitted after the interpretation is finalized.

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.

If the final interpretation illuminates a need to revise a product, the responding subcommittee may submit a corresponding suggestion via X12's maintenance request form.

6 RFI Policies

The following policies govern activities related to RFIs and interpretations.

1. The response to a formal RFI represents the official position of X12 and is presented as an official response from the ASC chair.
2. The response to an informal RFI represents the position of the subcommittee that developed the response.
3. Interpretations are not the appropriate vehicle for requesting a revision to a product; an RFI that is determined to be a request for a revision is closed and is not presented for public viewing.
   a. When an RFI is closed for this reason, the staff notifies the submitter and provides instructions for submitting a maintenance request via X12's maintenance request form.
4. In some cases, the responding subcommittee may decide the product should be revised to clarify the usage.
   a. If the request includes enough information the responding subcommittee enters a corresponding MR.
   b. If the request does not include enough information to create a corresponding MR, the response to the submitter indicates the submitter may want to submit an MR themselves and provides instructions for submitting the MR via X12's online form.
5. A project delegate may work with staff to obtain more information or clarification from the submitter at any time during the interpretation development process.
6. The project delegate of record may reassign the project delegate responsibilities at any time during the interpretation development process using the project delegate reassignment form. The reassignment must be to a qualified constituent of the responding subcommittee.
7. During the RFI development process:
   a. The responding subcommittee may request that PRB change the designation from formal to informal or vice-versa based on its analysis.
   b. The responding subcommittee may reassign the project delegate responsibilities.
   c. The responding subcommittee's PRB representative may request PRB reassign the RFI to a different subcommittee. The responding subcommittee must present its reasons or rationale to PRB at the time of the request.
   d. 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.
8. An ASC subcommittee may establish a subcommittee-specific workflow defining its specific steps. However, any subcommittee-level governance must 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.

9. X12 must timely revise or withdraw any published interpretation that is no longer applicable or accurate. This might be due to changes in the EDI Standard or an associated technical report, or changes to X12 policies.

10. Any subcommittee may at any time vote to petition PRB asking that an interpretation be revised or retracted. The subcommittee's PRB representative presents the petition to the PRB chair along with a recommendation about whether the RFI should be removed from the RFI website pending PRB's action on the matter. The PRB chair adds the topic to the next PRB agenda or initiates a PRB discussion via iMeet.

11. If PRB grants the reconsideration, the subcommittee responsible for the development of the published interpretation is assigned responsibility for considering the request for revision or retraction.
    a. If the subcommittee responsible for the development of the published interpretation is no longer an active subcommittee, PRB assigns responsibility for considering the request to the subcommittee responsible for maintaining the underlying X12 product.
    b. If the subcommittee responsible for the development of the published interpretation does not wish to accept responsibility for considering the request, PRB assigns responsibility for considering the request to the subcommittee responsible for maintaining the underlying X12 product or to the subcommittee with the most material interest in the published interpretation.

12. When the responsible subcommittee completes its assessment and determines any action to be taken, PRB ensures due process was achieved before confirming the decision.

7   Processing an RFI

When an RFI is presented to X12, the following process applies.
1. Staff vets the RFI to ensure it is clearly articulated and presents a question on the proper use or implementation of an X12 product. If necessary, the staff will contact the submitter to ask for more information or to have the question clarified.
   a. If the request is clearly form spam, staff deletes it and no further action is taken. For this purpose, form spam is defined as an online form completed and submitted with irrelevant or fake information.
   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 is 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 is 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 a co-chair as the RFI's project delegate. Otherwise, staff assigns the subcommittee's PRB representative as the RFI's initial project delegate.

    a. Staff informs PRB of the RFI and initial assignment via an iMeet thread.

    b. 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 five (5) 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.

        i.   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.

        ii. 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 initial project delegate.

        iii. 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 stands.

4. The project delegate guides the RFI through the interpretation development process.

    a. If the request is designated as informal, proceed to *Section 8 Developing an Informal Interpretation.*

    b. If the request is designated as a formal interpretation, proceed to *Section 9 Developing a Formal Interpretation*

8   Developing an Informal Interpretation

The process for developing an informal interpretation is as follows.

1. The responding subcommittee develops and approves an interpretation in response to the RFI.

2. The project delegate informs staff of the approval via the [RFI finalization form](#).

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.

9   Developing a Formal Interpretation

The process for developing a formal interpretation is as follows.

1. The responding subcommittee develops and approves an interpretation in response to the RFI.
2. The project delegate informs staff of the approval via the [RFI finalization form](#).
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. When the ASC chair is satisfied with the recommended interpretation they inform staff of the approval and request that staff move the recommended interpretation to X12J for action.
6. Staff creates a discussion thread in X12J's iMeet workspace and posts the request and recommended interpretation for review. This review is to identify any technical inaccuracies, not to wordsmith the 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 at the next X12J meeting.
    a. Although all X12J's constituents are permitted to participate in the discussion of the recommended interpretations, only the subcommittee representatives, also known as category 1 constituents, vote on these matters.
    b. If all subcommittees either approve the recommended interpretation or abstain, this interpretation is final. Proceed to step 9 below.
    c. If any subcommittee disapproves the recommended interpretation based on a perceived technical inaccuracy, the X12J chair attempts to resolve the issue(s) causing the disapproval.
    d. If the subcommittees cannot all agree on the recommended interpretation after a good faith discussion, the subcommittee representatives vote to approve or disapprove the recommendation by majority decision.
    e. If X12J's decision is to disapprove, the X12J chair works with the ASC chair to resolve the technical inaccuracy.
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.

10 Modifying an Interpretation

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

1. Following subcommittee approval of such a petition, the subcommittee's PRB representative initiates 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.
2. PRB either denies the petition or assigns responsibility for considering the request for revision or retraction to a subcommittee.
3. Staff documents the action in the RFI tracking system.
4. If the subcommittee submitting the modification request is not the subcommittee responsible for the development of the published interpretation, the responsible subcommittee considers the petition and votes on a recommendation as to the action to be taken. Potential actions are to deny the petition, to agree with the petition and revise the published interpretation, or to agree to withdraw the interpretations and remove it from the X12 website.
5. The responsible subcommittee's PRB representative notifies staff of the responsible subcommittee's recommendation.
6. Staff creates a discussion thread in X12J's iMeet workspace.
7. 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.
8. X12J acts on the petition.
    a. If all subcommittees either approve the petition or abstain, proceed to step 9 below.
    b. If any subcommittee disapproves the petition, X12J attempts to resolve the issue(s) causing the disapproval.
    c. If all subcommittees cannot agree after a good faith discussion, the X12J constituents vote to decide on the petition by majority decision.
9. Staff documents the actions in the RFI tracking system.
10. Staff creates a discussion thread in PRB's iMeet workspace.
11. PRB verifies due process via 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 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.

11 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** must be used in X12 products when applicable, without modification or revision. The **Wordbook** can be referenced online at <u>wordbook.x12.org</u>

12 Document History

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

Date	Description
06/06/2024	V1: Standalone RFI process created based on the RFI sections of ASC02v5.