Electronic Health Network Town Hall
Implementing Maryland Law

Developing Electronic Health Care Transactions Technical Submission Guidance

November 14, 2025

Agenda

1. Welcome

2. Technical Submission Requirements Feedback

3. Status of Regulations

4. Timeline for Guidance Development & Transaction Reporting

5. Closing Remarks

CRISP
Chesapeake Regional Information System for our Patients

Welcome

MARYLAND Health Care Commission

CRISP

David Sharp

Director

Anna Gribble

Assistant Division Chief

Nikki Majewski

Chief, Health Information Technology

Meg LaMar

Project Manager

Taneisha Laume

Director of HIE Projects

Mary Pohl

Senior Advisor

Technical Submission Requirements

Question	Responses and Notes	Draft Approach
Does your organization have a preference of X12 or flat file format?	Most EHNs prefer submitting in a standard transaction format but noted that required filtering may necessitate a flat file format.	As required in the regulations, CRISP will provide options for both submission types.
Does pipe delimited CSV pose a problem for your organization?	EHNs did not express any concern for pipe delimiters in flat files. EHNs requested to avoid commonly used X12 delimiters.	CRISP will not use common X12 delimiters as delimiters in flat file submission formats.
Discuss any variables that should not be included?	Some EHNs expressed concern on the difficultly to modify the content in the transaction and requested to include the entire transaction. Other EHNs indicated that certain data points should be removed.	All variables should be included in the submission
For flat files, should CRISP map each value to X12 (loops/segments/data elements)?	For all that responded, EHNs should prefer for CRISP to map.	CRISP is drafting the mapping.

Technical Submission Requirements

Question	Responses and Notes	Draft Approach
Should CRISP provide separate layouts flat files for 837P and 837I?	EHNs prefer separate layouts for 837P and 837 I flat files citing system architecture and similarities to All Payer Claims Database (APCD) CDL.	CRISP is drafting flat file mapping with separate layouts.
What data exchange format does your organization prefer?	EHNs agreed that SFTP best supports data exchange to this purpose.	CRISP will offer SFTP.

Additional Questions Received from EHNs:
- Defining "services delivered in Maryland;" should there be additional consideration for virtual services?
- Retention or data replay expectation
- CRISP acknowledge receipt for both X12 and flat files

REGULATIONS

COMAR 10.25.07, *Certification of Electronic Health Networks and Medical Care Electronic Claims Clearinghouses*

Finalized Regulations

▶ Amendments to COMAR 10.25.07 were posted in the Maryland Register on October 31, 2025 and became effective November 10, 2025

▶ The regulations were developed iteratively; MHCC appreciate stakeholders' collaboration

- September 2021 – March 2022: Convened three townhall meetings with representatives from EHNs and CRISP
- May 2024: Released draft amendments and considered informal public comments
- July 2024: Convened a stakeholder working session to discuss the draft regulations
- October 2024: Proposed regulations approved by the Commission
    - December 2024 – January 2025: Published in the Maryland Register with a 30-day public comment period
- June 2025: Reproposed regulations with additional amendments approved by the Commission
    - August 2025 – September 2025: Published in the Maryland Register with a 30-day public comment period
- October 2025: Proposed final regulations approved by the Commission

Background – State Law

Chapter 791 (Senate Bill 748) and Chapter 790 (House Bill 1022), *Public Health – State Designated Exchange – Clinical Information* (2021)

- ▶ Requires EHNs to provide electronic health care transactions to the State-Designated Health Information Exchange (CRISP) and CRISP to make the information available for certain purposes

Chapter 625 (House Bill 1104), *Maryland Department of Health – AHEAD Model Implementation – Electronic Health Care Transactions and Population Health Improvement Fund* (2025)

- ▶ Clarifies that electronic health care transaction information may be used to support the State's participation in the AHEAD model and any successor models, among other things

Closing Remarks and Questions?

Contacts:

Meg LaMar: Megan.Lamar@crisphealth.org

Anna Gibble: anna.gribble1@maryland.gov