Vermont Department of Labor (VDOL)

Electronic Data Interchange (EDI) Implementation Guide

Vermont Department of Labor Table of Contents

INTRODUCTION

Preface

This Implementation Guide is designed to assist insurers; self-administered, self-insured employers; claim administrators; and vendors with the transition from paper filing to electronic filing of First and Subsequent Reports of Injury. The guide will also serve as a tool during the EDI set-up process for reporting First and Subsequent Reports of Injury to the Vermont Department of Labor.

If there are any questions about the information provided in this guide, please direct all inquiries to: VDOL-EDICoordinator@ebix.com.

Contact Information

VDOL EDI Coordinator

Questions about EDI reporting to VDOL-EDICoordinator@ebix.com.

Vermont Department of Labor

The VDOL website is located at https://labor.vermont.gov/WCEDI

IAIABC

The IAIABC EDI resources for Claims Release 3.1 are located at https://www.iaiabc.org. The IAIABC EDI Release 3.1 Implementation Guide is also available at this website. The VDOL supports the Release 3.1 Version of the Claims EDI and exclusively accepts XML file format.

Accident Reporting History

<u>ACCIDENT REPORTING REQUIREMENTS UNDER THE VERMONT WORKERS' COMPENSATION ACT</u>

<u>21 V.S.A. § 701: Reports of Accidents by Employers</u>

§ 701 Every employer liable to pay compensation under the provisions of this chapter shall keep a record of all injuries, fatal or otherwise, sustained by his or her employees in the course of their employment and shall report such an injury causing an absence of one day or more, or necessitating medical attendance, to the Commissioner in writing upon forms to be procured from him or her for such purpose within 72 hours, Sundays and legal holidays excluded, after the occurrence of such an injury. At the termination of the disability of such injured employee, such employer shall make a final report upon forms to be procured as herein provided. If such disability extends beyond a period of 60 days, at the expiration of each 60-day period, such employer shall make a supplemental report to the Commissioner that such injured employee is still disabled and, at the termination of such disability, shall file a final report as provided in this section.

EDI Reporting Rules

Electronic Data Interchange (EDI)

Electronic Data Interchange (EDI) is the electronic interchange of business information using a standardized format; a process which allows an organization to send information to another organization electronically rather than with paper. Business entities conducting business electronically are called trading partners. The Vermont Department of Labor (VDOL) has adopted the IAIABC Claims Release 3.1 EDI Standard. Previously, only First Reports of Injury (FROI) were accepted electronically. With the implementation of IAIABC Claims Release 3.1, both FROIs and Subsequent Reports of Injury (SROI) will be accepted electronically instead of on paper.

EDI Trading Partner Process: Definition and Initiation

A trading partner is a term used to designate the entity responsible for submitting EDI reports to the VDOL. All of the Trading Partner Agreement and Profile Documents must be completed before any files are submitted and before EDI transmissions can begin. Trading partners must complete these forms immediately so that the VDOL EDI Coordinator can reserve an appropriate place in the testing and implementation schedule. Once the Trading Partner Agreement and Profile Documents have been received, the VDOL EDI Coordinator will make contact to develop and agree upon a testing and implementation plan and schedule.

In preparation for testing, trading partners will need to review the Vermont EDI Data Requirements and Claim Events for reporting and determine changes that will need to be made in order to comply with the new standard. Testing requires that test transactions come to the VDOL through the reporting and "sending" systems that will be used once approval is received to send "production" transmissions.

Low Filer Definition

Trading partners who submit 10 workers' compensation claims or less to the VDOL annually will have the option to manually submit FROIs and SROIs via an online submission portal. This option would supplant the use of XML EDI transmissions. Manual web-based reporting will be limited to small-volume filers. If your organization qualifies and you wish to file via the online submission portal, please designate this as your desired reporting type when filling out your Trading Partner Agreement and Profile Documents. If you later decide to begin reporting through XML EDI transmission, either through a vendor or directly, you will be required to update your Trading Partner Agreement and Profile Documents. Trading partners are only allowed to select one reporting option at a time.

Electronic Data Reporting Format

The VDOL has adopted the IAIABC Claims Release Standards for all EDI submissions. The IAIABC Implementation Guide can be found on the IAIABC website (https://iaiabc.org). Data format must be in compliance with the standard XML file format described in the IAIABC EDI Release 3.1 Implementation Guide and IAIABC XML Companion Guide (also available on the IAIABC website).

VDOL EDI Reporting Requirements

EDI reporting requirements are described below. The VDOL Event Table, Element Requirement Table, and Edit Matrix can be found at https://labor.vermont.gov/WCEDI.

Event Table (ET)

The VDOL Event Table identifies the situations for which an EDI filing is required and provides the following information:

- Describes conditions that "trigger" electronic reports required by the VDOL

- Describes when the report is due

- Describes Report Due dates based on the VDOL legislative mandate

Element Requirement Table (ERT)

The VDOL Element Requirement Table includes the following details:

- Lists the data elements that are required for each FROI/SROI listed on the VDOL Event Table.

- Identifies data elements that contain the indicator "MC" (Mandatory Conditional). The conditions for the "MC" data elements are detailed in the ERT.

- Gives requirements for reporting event benefit segment

Edit Matrix (EM)

The VDOL Edit Matrix describes editing that will be applied to transactions coming into the VDOL and includes the following information:

- VDOL Edit Matrix Change Log—describes the changes that have been made to the Edit Matrix since the last version was published.

- DN-Error Message—describes editing that will be applied to each data element.

- Value Table—lists the valid code values

- Valid Value Detail Page 1—first page of a Quick Code reference listing.

- Valid Value Detail Page 2—second page of a Quick Code reference listing.

- Match Data—lists the data elements that will be used to determine if the report will create a new claim or be matched to an existing claim

- Population Restrictions—details the restrictions applied to the data element(s).

- Sequencing—transaction sequencing for the VDOL. Specifically, the order in which Maintenance

Type Codes (MTCs) must be sent.

Transmitting EDI Files

Secure FTP (File Transfer Protocol)

Trading partners will connect to a standard SFTP (Secure File Transfer Protocol) server hosted by the VDOL. The trading partner will be contacted with their appropriate login information.

Once access is granted and the necessary information exchanged, trading partners may log into the SFTP server using their normal tools and method of connecting to SFTP. Then, upload FROIs/SROIs into the specified location on the server. There is a maximum of 3,000 claims per file. See the file naming convention provided later in this document under Testing Requirements. The files will be picked up, processed, and then deleted from the specified location.

Acknowledgments will be processed within 48 hours and trading partners are required to check the specified location for acknowledgment files. The file naming convention for the acknowledgment files is:

wc_edi_ack_VT_CCYYMMDD_HHMMSSsss.XML

The trading partner is required to delete files from the specified location as soon as they have been successfully received.

State Forms

VDOL has a requirement to submit supporting documentation as a results of EDI filings. The forms requirements are found at: https://labor.vermont.gov/WCEDI. Trading Partners can send document files to the state via the secure FTP. Low Filers may upload documents directly to claims via a web portal. Contact VDOL-EDICoordinator@ebix.com for details on forms required and how to upload supporting documentation.

Sending Supporting Documents to VDOL

Trading Partners must zip all documents that are sent for any claim XML file and place the ZIP in the SFTP location provided by VDOL EDI Coordinator. The following zip file and document file naming conventions must be used.

ZIP File Naming Convention

ZIP FILE - Concatenate the following components with underscore (_) between each component followed by the file extension (EXT)

Component	Value	Length
Juris	VT – Jurisdiction code	2
Sender	Trading Partner identification (999999999) - all Trading Partners must use the FEIN populated in the file header	9
Date	DN0100 - Date Transmission Sent (CCYYMMDD)	8
Time	DN0101 - Time Transmission Sent (HHMMSS)	6
Test/Production	Indicates whether the forms were generated from a test or production batch T = Test P = Production	1
DOCS	DOCS – indicates that this file contains supporting documents from the EDI Filer	4
EXT	File extension .zip	3

Example: VT_999999999_CCYYMMDD_HHMMSS_X_DOCS.zip

Document File Naming Convention

Document Name: Concatenate the following alpha/numeric components with underscore (_) between each component followed by the file extension (EXT). VDOL accepts .DOCX and .PDF file types.

Component	Value	Length
Juris	VT – Jurisdiction code	2
JCN	Jurisdiction Claim Number – indicates the unique number assigned to the claim by VDOL. Up to a maximum of 25 characters. There should be no embedded spaces or padding in the file name.	25 (variable)
MTC	DN0002 value for the EDI filing associated with the document being sent to VDOL	2
Form ID (*see form types below*)	Allows trading partners to indicate the VDOL specific form number. A maximum of 8 bytes are allowed, with no embedded spaces	8 (variable)
Claim number	DN0015 Claim Administrator Claim Number (25 bytes) identifies the claim the form pertains to. A maximum of 25 bytes is allowed with no embedded spaces in the file name	25 (variable)
File Identifier	A unique identifier used by the EDI filer for tracking purposes. Each file identifier within a ZIP file must be unique.	20 (variable)
EXT	File extension .pdf or .docx	4

Example: VT_XXXXXXXXXXXXXXXXXXXXXXXXXX_XX_XXXXXXXX_XXXXXXXXXXXXXXXXXXXXXXXXXX_99999999999999999999.pdf

			Form names for documents sent by claim administrators to VDOL		
MTC Filed	Form ID	Form Name	When Supporting Documentation Should Be Sent		
SROI 04	Form 2	Denial of Workers' Compensation Benefits by Employer or Carrier	Claim is denied SROI 04 must be accompanied by supporting evidence, Form ID EVID, MEDREC, or Other 11.1100 Generally. An employer or insurance carrier who seeks to deny an injured worker's claim for specific benefits causally related to a compensable injury shall file a Denial of Workers' Compensation Benefits (Form 2) with the Commissioner and the injured worker. The Denial shall clearly state the reason(s) for the denial, and shall be accompanied by copies of all relevant documentation, medical or otherwise, relied upon to support it.		

FROI 00 FROI 02	Form 1, Form 4, or Form 5	Employer First Report of Injury, Report of Fatal Accident, or Employee's Notice of Injury and Claim for Compensation	1. Initial filing with Employee Authorization To Release Medical Records Indicator populated
			    a. If Employee Authorization To Release Medical Records Indicator is populated, the transmission must be accompanied by Form 7, Vermont Workers' Compensation Medical Authorization, Form ID EVID
			2. Change in Release Medical Records Indicator
			    a. See above
			
			3.2100 Disclosure and use of medical information. The filing of a claim for workers' compensation benefits shall be a waiver of all claims to privilege as between the parties regarding medical information relevant to the specific claim. Therefore, upon request by the employer or insurance carrier in the course of its investigation, the injured worker shall execute Medical Authorizations (Form 7) as needed for the release of all relevant medical records and reports regarding his or her diagnosis, condition, treatment, permanent impairment and/or return to work restrictions or limitations. Information that may be requested includes minimum data to justify services and payment, office notes of the examination relating to diagnosis or treatment and any other relevant provider records contained in the file. 21 V.S.A. §655a.		

SROI PY	Form 16, Form 22, Form 23, Form 32, Form 25	Compromise Agreement, Agreement for Permanent Partial or Permanent Total Disability Compensation,	1. Compromise agreement is reached
			    a. The transmission must be accompanied by a copy of the signed agreement (letter), Form ID AGREE
			    b. The transmission must be accompanied by a copy of a completed Form 16, Form ID EVID
			13.1600 Compromise agreement; process. The parties to a negotiated compromise agreement shall submit a Compromise		

		Form names for documents sent by claim administrators to VDOL	

		Agreement for Compensation in Fatal Cases, Agreement for Temporary Compensation, Wage Statement	==Agreement (Form 16) to the Commissioner for review. The form must be accompanied by a letter==, signed by both parties…
			2. Agreement for Permanent Partial or Permanent Total Disability Compensation
			    a. The transmission must be accompanied by a copy of the signed agreement, Form ID AGREE
			    b. The transmission must be accompanied by a copy of a completed Form 22, Form ID EVID
			    c. The transmission must be accompanied by a copy of a completed Form 25, Form ID EVID
			    d. The transmission must be accompanied by supporting medical evidence, Form ID EVID
			10.1800 Agreement for Permanent Partial or Permanent Total Disability Compensation. In all cases in which permanent partial or permanent total disability benefits are owed, the employer or insurance carrier shall enter into an Agreement for Permanent Partial or Permanent Total Disability Compensation (Form 22) with the injured worker, and shall begin advancing benefits immediately. Once executed by the parties, ==the completed Agreement shall be filed with the Commissioner for review and approval.== 10.1810 Any Agreement for Permanent Partial or Permanent Total Disability Compensation submitted for the Commissioner's review ==must be accompanied by the necessary supporting documentation, including but not limited to (a) a Wage Statement (Form 25); and (b) medical evidence== establishing the date of end medical result and the extent of any permanent impairment and/or disability causally related to the compensable injury. The Commissioner shall not approve an Agreement that is inaccurately or insufficiently completed, or that lacks the necessary supporting documentation.
			3. Agreement for Temporary Compensation
			    a. The transmission must be accompanied by a copy of the signed agreement, Form ID AGREE
			    b. The transmission must be accompanied by a copy of the completed Form 32, Form ID EVID
			    c. The transmission must be accompanied by a copy of the completed Form 25, Form ID EVID
			    d. The transmission must be accompanied by a copy of the completed Form 10, Form ID EVID
			9.1400 Agreement for Temporary Compensation. In all cases in which temporary total and/or temporary partial disability benefits are owed, the employer or insurance carrier shall enter into an Agreement for Temporary Compensation (Form 32) with the injured worker, and shall begin paying benefits immediately. Once executed by the parties, ==the completed Agreement shall be filed with the Commissioner== for review and approval.
			9.1410 Any Agreement for Temporary Compensation submitted for the Commissioner's review ==must be accompanied by the necessary==

			Form names for documents sent by claim administrators to VDOL
			supporting documentation, including but not limited to a Wage Statement (Form 25) and Certificate of Dependency and Concurrent Employment (Form 10). The Commissioner shall not approve an Agreement that is inaccurately or insufficiently completed, or that lacks the necessary supporting documentation.
SROI PD SROI SX	Form 27	Employer's Notice of Intention to Discontinue Payments	Employer's Notice of Intention to Discontinue Payments is received The transmission may be accompanied by a copy of the completed Form 27, Form ID EVID The transmission must be accompanied by relevant evidence, Form ID EVID 12.1110 Notwithstanding the provisions of Rule 3.2700, the Employer's Notice of Intention to Discontinue Payments must be accompanied by all relevant evidence in the employer's or insurance carrier's possession that pertains directly to the specific benefit(s) for which discontinuance is sought, including both supporting and countervailing evidence. Previously filed evidence, including medical records referenced in an independent medical examination report or medical records review, need not be duplicated, but should be so referenced in the current filing.

Testing Requirements

Overview

All trading partners submitting to the VDOL are required to submit an updated Trading Partner Document for Release 3.1 before starting testing or before the state's go live date. Trading partner and EDI vendor testing for VDOL FROI/SROI IAIABC Claims EDI Release 3.1 will begin on March 31st 2023 and continue through October 20th 2023. All vendors and trading partners must complete the entire test plan.

Important Dates:
- Testing – March 31,2023 through October 20, 2023
- Updated Trading Partner Document – Before commencing testing, or by October 20, 2023
- Go live date – November 6, 2023
- Legacy Claim Filings Due – May 23, 2024

For additional information or help, please contact the VDOL EDI Support Team at VDOL-EDICoordinator@ebix.com.

Test Plan Procedures

The VDOL Test Plan is detailed in this section. This test plan includes the requirements that must be

completed in order to be approved for production EDI reporting.

Business Content Test File

After the VDOL's acknowledgement that the technical capability test file has been received and the VDOL EDI Test Coordinator has approved the capability portion of the test, the Trading Partner will forward the first business content test file of First Reports of Injury to the VDOL SFTP. The VDOL requires that the business content test file batches be separate transmissions sent on different dates during the claim administrator's test period. This applies to both FROIs and SROIs. Each business content test file's First Report of Injury transaction must meet the following conditions:

- Must be the production claims for validation of migration from R1 to R3.1;

- Must contain data from "actual claims" handled by the Trading Partner, which may either be open or closed claim files; and

- Must reflect the full spectrum of required FROI/SROI reports as detailed below in the business content testing scenarios.

- File naming convention:
  WC_EDI_FROI_VT_masterfein_YYYYMMDD_HHmmss.XML

  where:

  'FROI' is the report type = either 'FROI' or 'SROI'

  'MASTERFEIN' is the FEIN that has been entered on the trading partner's Trading Partner Agreement

  'YYYYMMDD' is the date format

  'HHmmss' is the time format

The business content test file must contain the following transactions in the proper sequence:

FROI Testing
First Batch of FROIs
- Header Record (Test/Production Indicator, set to "T")

- At least 14 First Reports of Injury transactions that include the following:
  - 4 FROI 00s (Original) to obtain TA
  - 1 FROI 00 (Original) with multiple Part of Body Injured Codes, using Body Part Injured Location Code on at least one and Part of Body Injured Fingers/Toes Location Code on at least one body part
  - 1 FROI 00 (Original) to cause a TR with missing required data element (Example: missing mandatory DN like Employer FEIN)
  - 1 FROI 00 (Original) to cause a TR with invalid data content (Example: invalid Employee Phone number)
  - 1 FROI 04 (Denial) to obtain TA
  - 1 FROI 04 (Denial) to cause a TR with missing required data element (Example: missing

Accident Site County when the state code is VT)

- o 4 FROI URs (Update Report) to obtain TA for previously accepted R1 claim using Dates of Injury prior to 03/01/2023
1 FROI UR (Update Report) to cause a TR with invalid data content using Dates of Injury prior to 03/01/2023 (Example: invalid Employee Postal Code)

- Trailer Record

The Trading Partner may not send a second or follow up business content test file until the acknowledgements from the previous filings have been received. Send the second test file batch immediately after receiving the acknowledgement from the first test batch file.

Second Batch of FROIs
- Header Record (Test/Production Indicator, set to "T")

- At least 11 transactions to send with second batch that include the following:
    - o 2 FROI 00s (Original) to obtain TA
    - o 2 FROI 00s (Original) to correct the TR submitted in Batch 1
    - o 1 FROI 04 (Denial) to correct TR submitted in Batch 1
    - o 1 FROI UR (Update Report) to correct TR submitted in Batch 1
    - o 4 FROI 02s (Change) from accepted FROIs in first batch
      (i) To Update a match data element from Batch 1(Example: Employee Last Name)
      (ii) To Add a non-match data element (Example: Employer Contact Name)
      (iii) To Remove a non-match data element (Example: Employee Phone Number)
      (iv) To delete a variable segment from a FROI submitted in Batch 1 (Example: a Part of Body Injury Code)
    - o 1 FROI/01 (cancel) from accepted FROI/00 in first batch

- Trailer Record

The Trading Partner should submit additional Business Content Test transmissions as needed to complete SROI testing. After completing FROIs Batch 1 and 2, the Trading Partner and/or their EDI Vendor must request testing review and approval from VDOL by submitting the **Vermont EDI Testing Feedback Request List R3.1** to VDOL-EDICoordinator@ebix.com. VDOL EDI Coordinator will notify the Trading Partner via email if the Trading Partner has passed the FROI tests and is approved to proceed with SROI testing.

SROI Testing

Trading Partners will need to submit all batches of FROI business content test transmissions to establish claims for SROI testing and to obtain the JCN that is required for the SROI testing. The SROI test MTCs listed must be submitted per the sequencing requirements to satisfy the MTCs required for the test. Trading Partners must submit complete data for all required data elements.

First Batch of SROIs

- Header Record (Test/Production Indicator, set to "T")
- 16 Subsequent Reports with the following:
  - 5 SROI UR on previously accepted FROI UR
  - 9 SROI IP are accepted
  - 1 SROI EP (Employer Paid)
  - 1 SROI CD to report Compensable Death with no Dependents/Payees
- Trailer Record

Second Batch of SROIs
- Header Record (Test/Production Indicator, set to "T")
- 12 Subsequent Reports with the following:
  - 1 SROI CA to report reduced earnings on previously accepted SROI IP
  - 1 SROI CB to change the Benefit Type Code on previously accepted SROI IP
  - 1 SROI CB to change the Benefit Type Code on previously accepted SROI EP
  - 4 SROI 02 change on previously accepted SROI IP
    - i. To Update a non-match data element
    - ii. To add a non-match data element
    - iii. To remove a non-match data element
    - iv. To delete any variable segment
  - 1 SROI SX to suspend benefits on previously accepted SROI IP
  - 1 SROI SX to suspend benefits on previously accepted SROI EP
  - 1 SROI 04 to deny a claim totally on previously accepted SROI IP
  - 1 SROI PD to partially deny a claim on previously accepted SROI IP
  - 1 SROI PY to report lump sum payment or settlement on previously accepted SROI IP

- Trailer Record

Third Batch of SROIs
- Header Record (Test/Production Indicator, set to "T")
- 5 Subsequent Reports with the following:
  - 1 SROI RB to reinstate benefits on previously accepted SX
  - 1 SROI ER to reinstate employer paid benefits on previously accepted SX
  - 1 SROI NT to Narrate the actions taken on a claim
  - 2 SROI/FN is accepted

- Trailer Record

If the claim administrator has not received an acknowledgement to the business content test file within three days following the date the file is sent, contact the VDOL EDI Test Coordinator at VDOL-EDICoordinator@Ebix.com to determine the test file status.

Upon completion of SROI testing (including FROI and SROI URs), the Trading Partner and/or their EDI Vendor must request testing review and approval from VDOL by submitting the Vermont EDI Testing Feedback Request List R3.1 to VDOL-EDICoordinator@Ebix.com.

EDI Production Status

VDOL will notify the Trading Partner via email of the production approval or will provide instructions on next steps if production approval is not granted. If approval is granted, the Trading Partner will receive a message similar to the following.

Congratulations! You are now officially approved for production EDI reporting of workers' compensation FROI and SROI data. Upon production approval by VDOL, the Trading Partner can then move to production for R3.1 filing as of 11/06/2023 in order to begin EDI reporting of workers' compensation FROI and SROI data.

VDOL Data transmissions will be monitored for completeness, validity, and accuracy by the VDOL team during production. Questions should be sent to **VDOL-EDICoordinator@Ebix.com**.