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July 27, 2015

**Re: Proposed changes to Rule Chapter 243, "Uniform Reporting System for Health Care Claims Data Sets"**

On behalf of the MHDO I would like to submit the following comment regarding the proposed rule change to Rule Chapter 243. Recently a payer submitted to the MHDO a medical claims file which failed as a result of the Service Provider Country Name-data element MC070. After discussing this issue with the payer we have concluded that as currently structured this data field is not consistently interpreted and populated by payers. Consequently, the value of this data element is limited. As a result of our external discussions our proposed resolution is as follows:

1. Strike out Service Provider Country Name
  - a. retain field position
  - b. require it be left blank
2. Add two country code fields
  - a. Billing Provider Country Code (MC093)
  - b. Service Facility Location Country Code (MC094)
3. MC093 and MC094 would only be required to the extent they are available in payer systems.

Thank you for your consideration. Karynlee

Cc: Philippe Bonneau  
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