DEPARTMENT OF LABOR AND INDUSTRY

Electronic data interchange (EDI) first action transactions

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Introduction

The EDI first action transaction is a subsequent report of injury (SROI) transaction submitted electronically by a claim administrator to notify the employee (or heirs or dependents of the employee), the employer and the Department of Labor and Industry (DLI) of the claim administrator's initial position regarding primary liability on a claim. DLI considers an EDI submission of a liability determination to be a "first action transaction." For fatalities or injuries with claimed disability (or lost time) beyond the three-day waiting period, the claim administrator must accept or deny primary liability within 14 days of the Initial Date Disability Began or the Initial Date Employer Had Knowledge of Date of Disability, whichever is later, to be considered timely.

DLI evaluates accepted EDI first action data according to Minn. Stat. § 176.221, subd. 1, and Minn. Stat. § 176.231, subd. 1, and determines if the employee received the first payment or denial of benefits timely. First action timeliness is a critical component of quality claims reporting, and it is important to know which first action transaction to submit and when to submit it. This document is a guide to the various types of EDI first action transactions, when to use them and when each type of transaction is due.

Accepting liability

If a claims administrator determines an injury is compensable, the first payment of disability benefits must be paid to the employee within 14 days of the Initial Date Disability Began or the Initial Date Employer Had Knowledge of Date of Disability, whichever is later, to be considered timely. Use the following EDI SROI transactions to report a compensable claim.

Initial Payment (IP)

- Report the first payment of temporary total disability or temporary partial disability benefits on an IP.
- The Payment Issue Date on an IP reflects the date the first payment is issued to the employee. This date will be used to determine first action timeliness.
- Begin *weekly* permanent partial disability (PPD) payments on an IP if it is the first or only benefit reported on a claim. This payment of PPD, however, will not be used to determine first action timeliness.
- The first payment of indemnity benefits made by a claim administrator on an acquired claim must be submitted on a SROI AP (Acquired Payment) transaction. If, however, the first payment is a lump sum per an award, submit an EDI PY (Payment Report).

Employer Paid (EP)

- When the employer is paying salary continuation under Minn. Stat. § 176.221, subd. 9, report the first payment on an EP. The Benefit Type Code reported is 250 – employer paid temporary total – which is what the calculation of temporary total benefits would be had the claim administrator been paying the benefits.
- The EP is always timely since it reflects full wage continuation (FWC) of wages paid by the employer.

Compensable Death (CD)

- Submit a CD when a compensable fatal injury with no known dependents has occurred and the executor of the estate is unknown. No payment of indemnity benefits will have been made.

- The CD is used to meet the first action timeliness requirement. It is due 14 calendar days from the date of death or the date the employer was notified of the death, whichever is later. (See Appendix C. MN Event Table, row 19 on the SROI tab).

Fully denying liability

When a claim administrator determines an injury is not compensable, they must report a full denial to inform the employee and DLI that benefits will not voluntarily be paid. A SROI 04 is used to report full denials to DLI.

Full Denial (04)

- To fully deny a claim that has claimed disability that exceeds the waiting period, submit the SROI 04 within 14 days of the Initial Date Disability Began or the Initial Date Employer Had Knowledge of Date of Disability, whichever is later. The date the SROI 04 is received will be used to determine first action timeliness.
- When denying a medical-only claim, it must be reported to DLI by submitting a FROI 00 and a SROI 04.
- If benefits were initially accepted and payment began, but the claim is not compensable and less than 90 days have passed since the Initial Date Disability Began or the Initial Date Employer Had Knowledge of Date of Disability were identified, submit the SROI 04. If fully denying the claim after 90 days, a SROI SX (Suspension) must be submitted to discontinue benefits.

Disability benefits will not be paid or will not initially be paid

In Minnesota, the SROI PD (Partial Denial) is a multi-use EDI transaction. Aside from its use reporting a partial denial of liability, the PD is used in some situations when disability dates are beyond the waiting period and benefits will not be paid, as well as on claims where the Initial Date Disability Began has previously been reported and there is no disability beyond the waiting period.

To be considered timely, a PD filed as a first action must be submitted within 14 days of the Initial Date Disability Began or the Initial Date Employer Had Knowledge of Date of Disability, whichever is later. The date received will be used to determine timeliness.

If DLI requests a PD for a reason other than an EDI first action, use the narrative on the PD to clarify the circumstances of the claim in a manner the employee and DLI can understand. A request from DLI to submit a PD for a reason other than an EDI first action is due within 30 days of the date of the request.

Reasons to submit a PD

Reporting a partial denial of liability

- Submit a PD on a compensable claim when disability benefits are denied but medical benefits will be paid in full or in part. In the PD narrative, clearly and thoroughly state your reason for partially denying the claim. Include all disability dates and a return-to-work (RTW) date with a RTW Type Code of "Actual" unless the employee did not physically return to work. If the employee did not physically return to work, a RTW Type Code of “Released” would be reported on a PD with an explanation in the narrative why the employee did not physically return to work.

When accepting liability on a claim, but disability benefits will not initially be paid

- If waiting on wage statements before paying temporary partial disability, submit a PD with the Anticipated Wage Loss Indicator set to “Yes” and indicate in the narrative that temporary partial disability benefits are expected to be paid after wage statements are received. Submit the PD within 14 days of the Initial Date Disability Began or the Initial Date Employer Had Knowledge of Date of Disability, whichever is later. This PD will be the first action on the claim and will be considered timely if received within the 14-day window.
- For a fatality, submit a PD when liability is accepted but the first payment will be forthcoming. Complete the narrative with your explanation. (See CD under ”Accepting liability” above when the fatality is compensable but there are no known dependents and the executor of the estate is unknown).

Reported disability dates are beyond the three-day waiting period but there is no payable disability

- The employee works a Monday through Friday schedule, and Saturday and Sunday appear to be included as disability dates since the employee returned to work with an "Actual" RTW Type Code after the weekend. Be sure you have reported a “Standard” (Monday through Friday) Work Week Type Code or have reported the appropriate Work Days Scheduled Type Code.
- If the employee Work Week Type Code is “Varied”, an explanation of the employee work schedule is needed in the PD narrative to clarify if there is disability beyond the waiting period.
- A PD is needed to explain if an employee was or was not paid for a holiday that fell within the disability period.
- If time off was pre-scheduled prior to an injury and took place during the disability period, submit a PD to clearly explain that.

If an Initial Date Disability Began with no "Actual" Initial RTW Date was previously reported and the claim has no disability beyond the waiting period

- Submit a PD indicating “no disability beyond the waiting period” in the narrative and include an Initial RTW Date, "Actual" Initial RTW Type Code, Initial RTW With Restrictions Indicator and Initial RTW With Same Employer Indicator. If no "Actual" Initial RTW Type Code is submitted, the claim will appear to have ongoing lost time, and DLI will contact you to correct the claim.
- If disability is within the waiting period, another option is to submit an 02 (Change) transaction to add the Initial RTW Date, an ”Actual” Initial RTW Type Code, Initial RTW Physical Restrictions Indicator and Initial RTW with Same Employer Indicator. Do not remove the disability dates but add the return-to-work information instead. If you have questions regarding which 02 (FROI or SROI) transaction to submit, please contact department staff.

After an Initial Date Disability Began with no "Actual" Initial RTW Date was previously reported, but later it is determined the claim has no disability at all

- Submit a PD to remove the disability dates and use the narrative to explain why disability is no longer being reported.

Reporting a “Released” RTW Type Code

- Per EDI standards, a ”Released” RTW Type Code indicates an employee has not physically returned to work.

- If a ”Released” RTW Type Code is reported, it must be followed by a PD explaining why an employee did not physically return to work. A ”Released” RTW Type Code could also be followed by an EDI payment transaction if, for instance, the employer could not accommodate restrictions.
- An ”Actual” RTW Type Code indicates an employee has physically returned to work with or without restrictions, with no further disability or the employee has returned with TPD. If the RTW Type Code should be ”Actual”, update the code with an 02 transaction.

Key first action data and technical procedures

Payment Report (PY)

The SROI PY **is not an EDI first action transaction**:

- Submit a PY to report lump sums of Permanent Partial Disability (PPD) or benefits on awards and orders. Begin *weekly* PPD payments on an IP if it is the first or only benefit reported on a claim. Remember, first payments of temporary total disability or temporary partial disability should be submitted on the IP, and first payments of employer paid temporary total or employer paid temporary partial should be submitted on the EP.

Claims involving the Court of Administrative Hearings (CAH) - Calculating first action timeliness

- Filing an answer to a claim petition **does not satisfy** the EDI first action transaction requirement on a Campus claim.
- If a document initiating a dispute is accepted at CAH for an injury **which has not previously been required to be reported in Campus**, the claim administrator must report the injury to DLI with an EDI FROI 00 no later than 14 days of acceptance of the dispute-initiating document at CAH. In turn, an EDI first action transaction is due in Campus within 14 days of the Initial Date Disability Began or the Initial Date Employer Had Knowledge of Date of Disability listed on the FROI 00, whichever is later. First action timeliness will be calculated using the date received on an EDI 04 or PD, while the Payment Issue Date will be used to determine timeliness on an EDI IP.
- If a FROI 00 reporting disability beyond the waiting period is received in Campus **prior** to the date a dispute-initiating document was accepted at CAH, an EDI first action transaction is due in Campus within 14 days of the Initial Date Disability Began or the Initial Date Employer Had Knowledge of Date of Disability, whichever is later. First action timeliness will be calculated using the date received on an EDI 04 or PD, while the Payment Issue Date will be used to determine timeliness on an EDI IP.

The waiting period

The Initial Date Disability Began is the first day of any claimed lost time or wages due to an injury, whether or not that day is authorized off by a health care professional or paid in full by the employer. The waiting period begins the first day the employee misses any time from work due to an injury, plus the next two consecutive, calendar days regardless of whether the employee was scheduled to work either of those next two days. Under Minn. Stat. § 176.121: “…Disability is deemed to commence on the first calendar day or fraction of a calendar day that the employee is unable to work.”

First Day of Disability After the Waiting Period (FDDAWP)

The FDDAWP is the first day qualifying as a day of disability after the three-day waiting period has been met and should not automatically be present on every claim.

To calculate the FDDAWP: If the Initial Date Disability Began is on a Monday, count 2 more days (Tuesday, Wednesday). The FDDAWP would be the 4th day or Thursday. If the Initial Date Disability Began is on a Thursday and the employee works Monday through Friday, the waiting period would be Thursday, Friday, and Saturday; however, since the employee does not work on Sundays, the FDDAWP would be Monday.

When the first period of disability is within the three-day waiting period and there is a second period of disability, the FDDAWP will usually be the first day of the second period of disability or the Current Date Disability Began.

- For instance, an employee working Monday through Friday began losing time and the Initial Date Disability Began was reported as Monday, January 5, 2026. The employee returned to work ”Actual” with no restrictions on January 8, 2026 – at this point, there is no disability beyond the waiting period. The employee began losing time again and a Current Date Disability Began of January 21, 2026, was reported. Since a FDDAWP is the first day qualifying as a day of disability after the waiting period has been met, January 21, 2026, would be the FDDAWP.

Campus considers a claim with a FDDAWP a reportable claim with possible lost time, and this will affect first action timeliness. The FDDAWP needs to be removed from claims that have no disability at all or no disability beyond the waiting period. Remove a FDDWP with a SROI 02 if a SROI has been accepted on a claim; otherwise, remove it with a FROI 02.

- In order for an 02 to update the Campus claim, ensure your changes are accurately noted using both DN0412 Change Data Element/Segment Number and DN0413 Change Reason Code, and include DN0411 Number of Change Data Elements.

Employee work schedule

In some cases, an accurate employee work schedule is necessary to determine if disability is beyond the waiting period. Please add or update this information as soon as you receive it.

Work Week Types:

- Standard (S) = Employee works Monday through Friday every week.
- Fixed (F) = Employee works a fixed schedule each week, but the days are other than Monday through Friday (ex: Tuesday through Saturday or Sunday, Monday Tuesday and Thursday of each week).
- Varied (V) = Days scheduled change from week to week. A PD is needed to explain the work schedule.

A Work Week Type Code is added, updated or removed in the following ways:

- The Work Week Type Code can be included on a FROI 00.
- The code can be added when submitting a first action SROI transaction.
- It can be updated on a SROI 02 if a SROI has already been accepted; otherwise, it must be updated on a FROI 02.
- Update the code on a SROI transaction or 02 (whichever occurs first).
- The Work Week Type Code cannot be added or removed with an 02.

The Work Days Scheduled Code is added, updated or removed in the following ways:

- The Work Days Scheduled Code can be included on a FROI 00.
- It can be added when submitting a first action SROI transaction.
- The code can be added, updated or removed on a SROI 02 if a SROI has already been accepted; otherwise, it must be added, updated or removed with a FROI 02.
- Update the code on a SROI transaction or 02 (whichever occurs first).

First action request for information (RFI) from DLI

If an EDI first action transaction has not been received on a claim reporting disability beyond the waiting period, a first action RFI will be emailed to the claim administrator's Group Management member listed as the Designated Contact for Information Requests from DLI. An EDI transaction will be expected in return, unless noted otherwise in the request. Uploaded pre-Campus paper forms cannot be used to report data required on an EDI transaction, nor will they be used to calculate first action timeliness.

If you are receiving errors when submitting your EDI first action, please contact dli.edi@state.mn.us to resolve the issue.

Summary

Correct EDI first action transaction reporting and timeliness standards are outlined in Minnesota law. The standards ensure that injured workers timely receive notice of the claim first payment or denial decision. This document lays out the correct scenarios and methods for timely reporting first action claims data.

The table below summarizes the EDI Data Elements (DNs) mentioned in this document and should be used for reference when submitting EDI first action transactions.

EDI Data Elements (DNs) mentioned in this document			
DN	**Name**	**DN**	**Name**
DN0412	Change Data Element/Segment Number	DN0403	Initial RTW Type Code
DN0413	Change Reason Code	DN0404	Initial RTW Physical Restrictions Indicator
DN0144	Current Date Disability Began	DN0405	Initial RTW With Same Employer Indicator
DN0297	First Day of Disability After the Waiting Period	DN0411	Number of Change Data Elements
DN0056	Initial Date Disability Began	DN0195	Payment Issue Date
DN0281	Initial Date Employer Had Knowledge of Date of Disability	DN0205	Work Days Scheduled Code
DN0068	Initial RTW Date	DN0204	Work Week Type Code

If you have questions about EDI first action transactions, please contact dli.edi@state.mn.us or Lynne.D.Knowles@state.mn.us.