Health Plan Identifier

Comments from

Veterans Health Administration as Health Care Provider

Department of Veterans Affairs

July 19, 2010

Hearing on National Health Plan Identifier

NATIONAL COMMITTEE ON VITAL AND HEALTH STATISTICS

Subcommittee on Standards

Administrative Simplification under the Patient Protection and Affordable Care Act

National Health Plan Identifier

IDENTIFIER

- The National Health Plan Identifier (NHPI) will need to provide all of the information necessary to route the claim to the appropriate receiver.

- The NHPI needs to eliminate separate payer identifiers for primary versus secondary claims processing.

ENUMERATION STRATEGY

- There should be a standard enumeration strategy for the industry.

- Enumeration should occur at the health plan (payer) level. *If enumeration occurs at the benefit plan level, it will increase the amount of administrative effort required to maintain the association of the patient to their respective plan.*

ADMINISTRATION

- There should be a single administrator of the NHPI who is responsible for the maintenance and source of the data.

- The NHPI information should be readily available to all registered participants to obtain the source data to route transactions.

- A notification system is needed to communicate health plan ID changes to registered users.

ENFORCEMENT

- An enforcement strategy is needed if health plans do not apply or publish their ID number.

- All IDs should be available to all who register on the enumeration site.

ID CARDS

- Health Plan ID cards will need to display the NHPI.

    - This requirement will result in additional timing for remediation of systems, testing, generating and the distribution of new ID cards.

COVERED ENTITIES

- This regulation will need to consider covering entities outside of HIPAA including Workers Compensation and Property and Casualty plans.

    - If the regulation is not applied to non-covered entities, an impact assessment will be needed.

TIMEFRAME

- A two year implementation timeline to 10/1/2012 may not be realistic given the HIPAA 5010/D.0 and ICD-10 implementation efforts currently underway.

- There are Covered Entities (CEs) today who have not fully implemented NPI. CEs remediate systems at various times which impact ability to test & validate systems with trading partners. Indirect trading partners need to be able to test end-to-end.

- Suggest a cut-off period for health plan to obtain NHPI well before compliance date. To allow period of use for testing & validation across industry.

- Level 1 implementation – test (1 year)

- Level 2 implementation – use only health plan identifiers