Hearing on HIPAA and ACA Administrative Simplification Panel 5 – Health Plan ID Planning and Implementation Issues

National Committee on Vital and Health Statistics

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Blue Cross Blue Shield Association is an association of independent Blue Cross and Blue Shield companies.

What is the current status of preparation and health plan strategies for adopting the new health plan ID in transactions?

- All Plans are aware and at least in the process of conducting analyses to determine their enumeration schemas
- Some Plans have already obtained at a minimum their Controlling Health Plan (CHP) HPID(s)

What is the current status of preparation and health plan strategies for adopting the new health plan ID in transactions?

- Barriers to enumeration:
  - Continued industry confusion as to the business issue that HPID is intended to solve
  - CHP and SHP definitions in the Final Rule appear to require greater enumeration than that currently used
  - Lack of clarity on cost benefit impacts due to potential for greater enumeration
  - Lack of information on other potential uses and requirements of HPID
    - Certification of Compliance proposed rule still under comment period
  - Lack of clarity on the applicability of HPID to self-insured and fully-insured group health plans when those groups do not conduct standard transactions adopted under HIPAA

What is the current status of preparation and plan strategies for using the new health plan ID in transactions?

- Clarification of the language related to the HPID in the standards is still being conducted by the standard organization
- Enumeration challenges not fully resolved
- The ability of Plans to complete strategy planning, begin implementations and communicate with trading partners is dependent upon the first two items. The longer it takes to resolve those items, the less time available for:
  - Plan implementation and communication activities
  - Provider and other trading partner implementation

What are the key issues and challenges with the adoption of a health plan ID? How can these issues be addressed?

- Different interpretations on the degree of granularity to which Plans are required to enumerate
  - For some Plans, results in a much greater level than they use currently today
  - Plans are concerned of the downstream impacts to their trading partners if greater enumeration is required
- Disruption of well functioning transaction flows may result in unintended
  - Payment disruption for providers
  - Privacy and security breaches as a result of transaction misroutes
- Further clarification on the intent and definition of HPID, including the impacts to health plans not conducting standard transactions

What are the key issues and challenges with the adoption of Other Entity Identifier (OEID)? How can these issues be addressed?

- Voluntary approach is appropriate to reduce burdens of enumeration without business need to do so by the entity
- Further refinement based on actual experience if industry identifies need easier under a voluntary approach

What is the impact on TPAs and ASOs of HPID and Certification of Compliance?

- Impacts as yet unclear due to the lack of clarity around self-insured and fully-insured group health plans who do not conduct standard transactions
- Resolution is key for Plans as they operate as TPAs and ASOs for many of these group health plans