Lessons Learned from the NPI

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1. **What Business Problems is the Health Plan ID is Intended to Satisfy?**
   ◦ Administrative Simplification? Health Information Exchange? Both?

2. **Involve Industry Early and Often**
   ◦ NCVHS Hearings
   ◦ CMS Participation in WEDI Workgroups
   ◦ Expand Industry Outreach

3. **Provide an Electronic File Interchange (EFIO) capability or bulk enumeration**
   ◦ A time saver for larger organizations & eliminates many keying errors

Enumeration

4. **Design, Develop and Test a Robust Enumeration System, Complete with Necessary Business Rules & Data Validation Edits.**
   - Leverage NPPES if Doing So is Advantageous
   - Fully understand how CMS Internal Systems Interact Prior to Design

5. **Involve Industry to Gain Better Sense of Business Needs of System**
   - Designing, Reviewing the Rules of Enumeration
   - Determining, Reviewing System Edits

6. **Assess Impact of a Real-time System Interfacing with other internal CMS Systems**
   - When databases do not match, which will over-ride the other?

System Development

7. **Gather Industry Input on What Plan ID System Data is Needed & By Whom**
   ◦ Who owns the numbers?
   ◦ Who has access to the data?
   ◦ Impact of data available to competitors
   ◦ Balance need to avoid payment disruption with security needs

8. **System Availability**
   ◦ Real-time transactions require 24x7 access and uptime of Look-up feature

9. **"User Friendly" Look-up Capability**
   ◦ Organizations developed products from taking NPPES data and providing private value-add features

Data Dissemination and Look-up

10. **Impact on Health Plan ID Cards**
    - What other information must be displayed?
    - Machine and human readable "real estate"
    - Cost to industry of change in ID Cards – initial and ongoing

11. **Impact of Improper Routing of Claims or Authorizations**
    - Privacy issues, eligibility and benefits issues, payment issues

12. **Unintended Consequences**

Assess Downstream Impacts and Risks/Consequences