



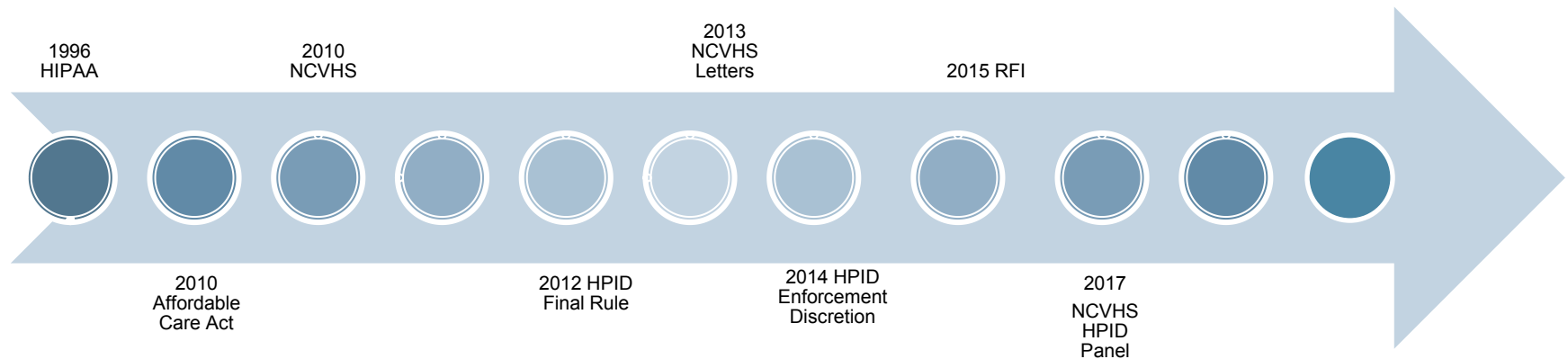
Division of National Standards (DNS)
Health Plan Identifier Overview
Madhu Annadata, Director

May 3, 2017

Division of National Standards

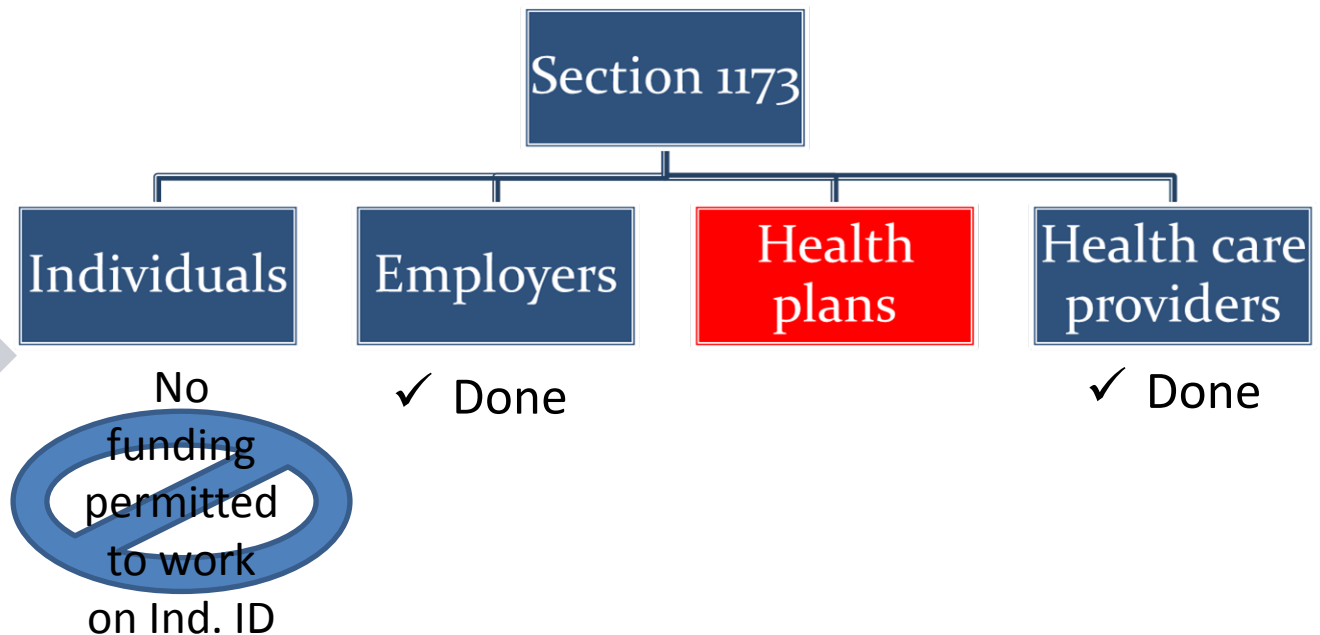
- Under the Office of Information of Technology (OIT) and Part of the Program Management Office
- Formerly known as the National Standards Group (formerly known as the Office of eHealth Standards and Services)
- Still responsible for the adoption and enforcement of standards, operating rules, code sets and identifiers; outreach and industry collaboration.

20 Years of History for the Unique Health Plan Identifier - Policy Development Timeline



Re-cap on Identifiers ... Just in Case Health Insurance Portability and Accountability Act (HIPAA) 1996

1996



Plan Identifier – “It’s Complicated”

2005

WEDI Policy
Advisory Groups

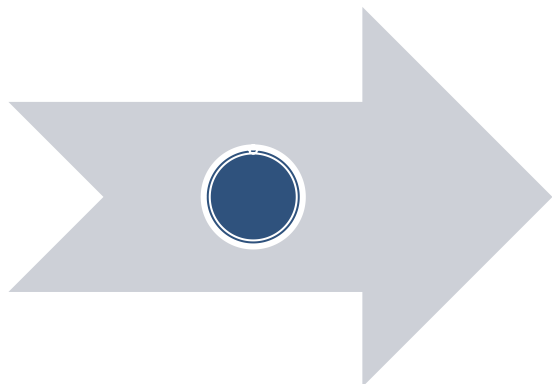
Research

Industry Meetings



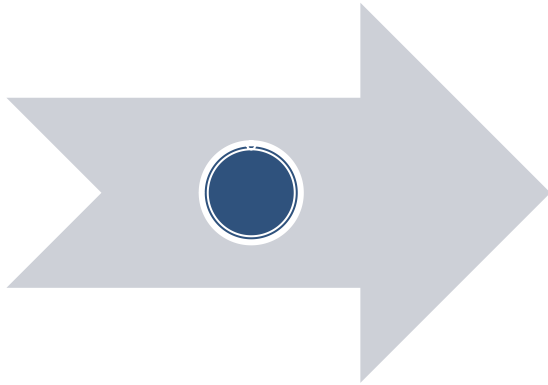
Affordable Care Act (ACA) 2010

2010



ACA Refreshes Certain Requirements

2010



- Industry Research and Re-set
- July – September 2010
 - NCVHS funds environmental scan on history, purpose and use of HPID
 - NCVHS hearing and letter of recommendation

NCVHS Recommendations - 2010

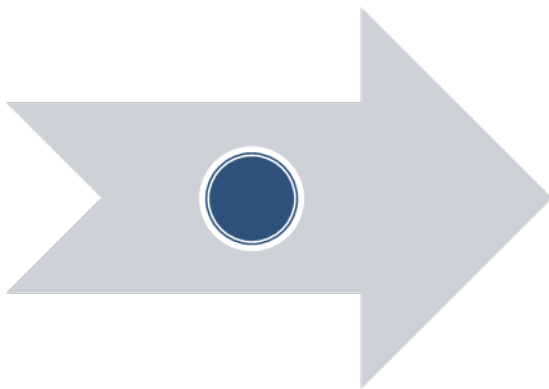


Recommendations:

- Provide definitions of types of eligible entities for enumeration
- Allow for levels of enumeration
- Format and content of HPID
- Directory database
- Retail pharmacy issues
- Implementation time
- Ensure adequate testing
- Improve standards and operating rules in support of HPID

HHS publishes HPID Final Rule (1)

2012



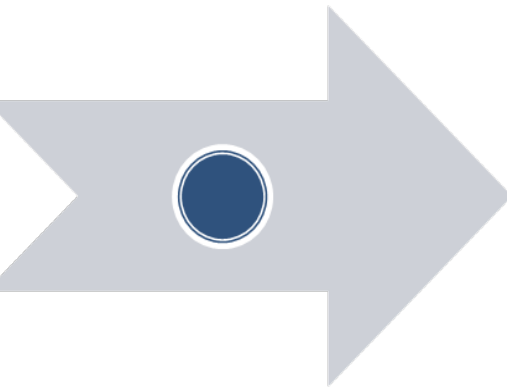
- Required for use in standard transactions to identify a health plan that has an HPID
- Allowed for use for other lawful purposes

Health Plan Identifier Final Rule (2)

Created new definitions for enumeration purposes:

- **Controlling Health Plan (CHP)**
- **Subhealth plan (SHP)**

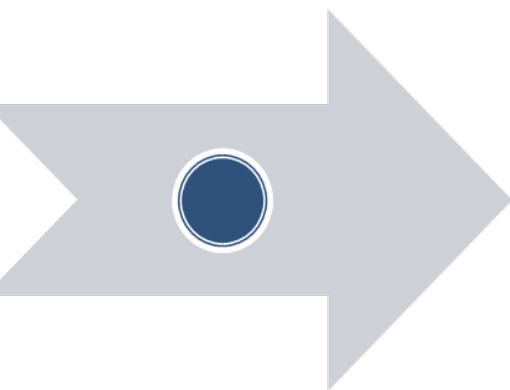
2012



Entity	Enumeration Requirements	Enumerations Options
CHPs	Must get an HPID for itself	<ul style="list-style-type: none"> • May get an HPID(s) for its SHP(s) • May direct its SHP(s) to get HPID(s)
SHPs	Not required to get an HPID	<ul style="list-style-type: none"> • May get an HPID at the direction of its CHP • May get an HPID of its own initiative

Health Plan Identifier Final Rule (3)

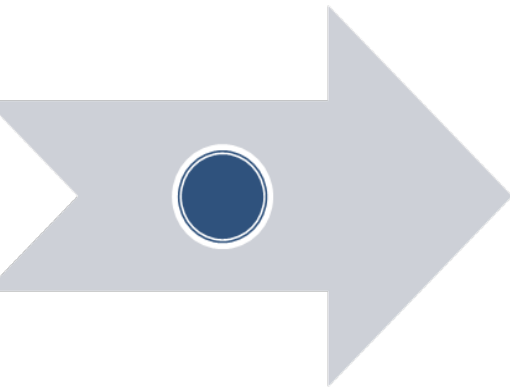
2012



Entity Type	Compliance Date for Obtaining HPID	Full Implementation Date for Using HPID in Standard Transactions
Health Plans, excluding small health plans	November 5, 2014	November 7, 2016
Small Health Plans*	November 5, 2015	November 7, 2016
Covered Healthcare Providers	N/A	November 7, 2016
Healthcare Clearinghouses	N/A	November 7, 2016

Health Plan Identifier Final Rule (4)

2012



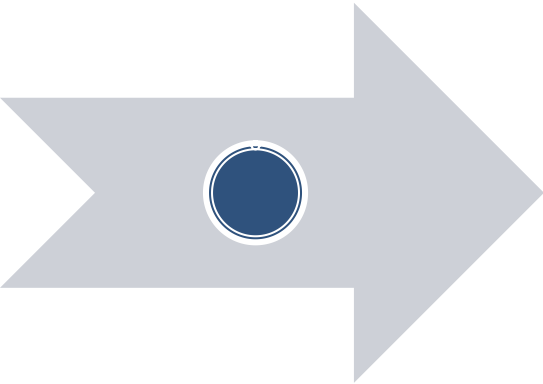
- Created a voluntary Identifier- Other Entity Identifier (OEID)

Must meet following requirements:

- Needs to be identified in the standard transactions
- Is NOT eligible to obtain an NPI
- Is NOT eligible to obtain an HPID
- Is NOT an individual

NCVHS Hearings Post Final Rule

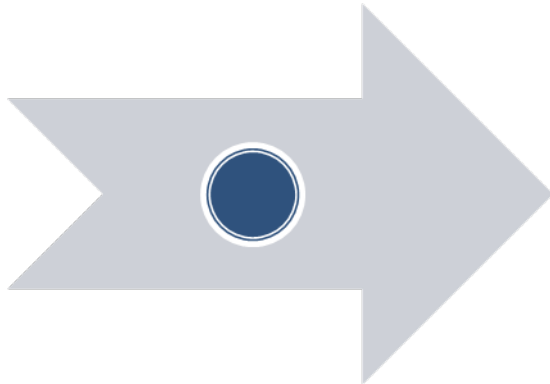
2014



- Final rule not well received by industry
- NCVHS held two hearings
- NCVHS sent two letters focused on intent of final rule - specifically HPID use in transactions.
- Letters and other industry input resulted in HHS action to delay implementation

Enforcement Discretion

2014



Effective October 31, 2014, the Centers for Medicare & Medicaid Services (CMS) announced a delay in the enforcement of the HPID rule

- Affected requirement for enumeration and use of the HPID in HIPAA transactions

The enforcement discretion is still in effect today.

Request for Information

2015

On May 29, 2015, HHS released a **Request for Information (RFI)** to solicit industry feedback about the HPID.

RFI requested input on three questions

Where do we go from here?

2017

