



Health Level Seven[®] International
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WRITTEN TESTIMONY
NATIONAL COMMITTEE ON VITAL AND
HEALTH STATISTICS
SUBCOMMITTEE ON STANDARDS
On Unique Health Plan Identifier (HPID)

May 3, 2017

Dear National Committee on Vital and Health Statistics Subcommittee on Standards Co-chairs:

HL7 presents the following information in response to your questions regarding the regulatory requirement for a Unique Health Plan Identifier (HPID).

ABOUT HL7

Founded in 1987, Health Level Seven International (HL7) is a not-for-profit, ANSI-accredited standards developing organization dedicated to providing a comprehensive framework and related standards for the exchange, integration, sharing, and retrieval of electronic health information that supports clinical practice and the management, delivery and evaluation of health services. HL7 is supported by more than 1,600 members from over 50 countries, including 500+ corporate members representing healthcare providers, government stakeholders, payers, pharmaceutical companies, vendors/suppliers, and consulting firms.

RESPONSES

1. What health plan identifiers are used today and for what purpose? Visual work flows are welcome.

The Payer ID identified in the X12 transactions currently uses the NAIC or Tax ID. To promote interoperability, HL7 provides the ability to use the same value sets as used by the X12 standards to identify a payer. Health Plan IDs are not used or needed.

2. What business needs do you have that are not adequately met with the current scheme in use today?

HL7 standards focus on the content of the message. We have not identified any business needs that are not met by the current identifiers and their schemas.

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3. What benefits do you see the current HPID model established by the HHS regulation provide? Does the model established in the final HPID rule meet your business needs?

The current HPID model does not offer any benefits in the exchange of HL7 standards.

4. What challenges do you see with the current HPID model established by HHS?

Introduction of the HPID will subject the industry to additional costs and maintenance without any return of investment. The current HPID model will cause confusion among stakeholders with the enumeration process, and can result in the experience of misrouting of transactions throughout the industry.

5. What recommendations do you have going forward regarding health plan identifiers and an HPID final rule established by HHS?

HL7 supports rescinding the current HPID regulation and sees no need for any further development or use of the HPID.

HL7 appreciates the opportunity to provide our position on the current need for an HPID. If you have any questions, please contact Dr. Charles Jaffe, CEO, cjaffe@HL7.org; or Wayne Kubick, CTO, wkubick@HL7.org.

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