



**National Uniform Billing Committee**

National Committee on Vital and Health Statistics  
Subcommittee on Standards  
c/o Lorraine Doo  
Senior Policy Advisor  
National Standards Group  
Office of Enterprise Information

April 24, 2017

Dear Members of the Subcommittee on Standards:

The members of the National Uniform Billing Committee (NUBC) are pleased to respond to the Affordable Care Act's regulatory requirement for a Unique Health Plan Identifier (HPID). The NUBC, began in 1975, includes a diverse group of leading health care associations and other organizations for the purpose of promoting and maintaining a uniform claim data set for use by institutional health care providers and health plans. The NUBC is recognized in the Health Insurance Portability and Accountability Act of 1996 (HIPAA) for a special role in the development of the electronic standards called for under the administrative simplification provisions of HIPAA.

While the goal of the HPID was to standardize identification of health plans to support improvements in the routing of electronic information, the final rule indicates that users must use an HPID within HIPAA transaction standards. **The NUBC believes that moving forward with the HPID will create significant administrative problems without any corresponding benefit.**

Today providers and health plans **continue to utilize existing payer identifiers** to ensure proper payer identification without having to rely on another number such as the HPID. Introducing the HPID would create confusion for providers, disruptions within existing system processing as well as incur additional costs without adding any efficiency or benefit.

**The NUBC recommends that the Department of Health and Human Services (HHS) revise the final rule to prohibit the use of the HPID within a HIPAA transaction.**

Again, the NUBC appreciates the opportunity to provide our comments on the need for the HPID. Should you have any questions, please contact me at [garges@aha.org](mailto:garges@aha.org) or by phone at 312-422-3398.

Sincerely

George Arges  
Chair, National Uniform Billing Committee