



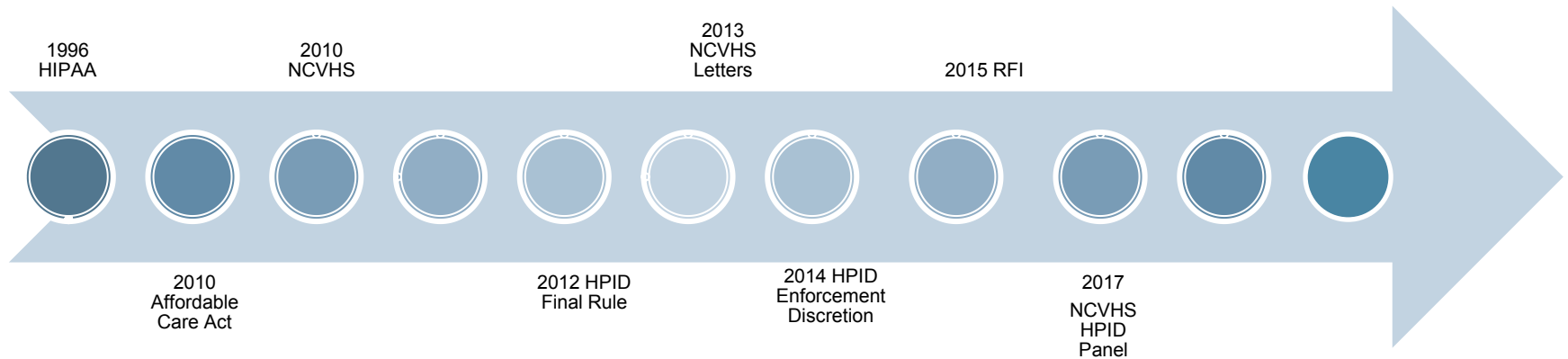
***Division of National Standards (DNS)***  
***Health Plan Identifier Overview***  
***Madhu Annadata, Director***

May 3, 2017

# Division of National Standards

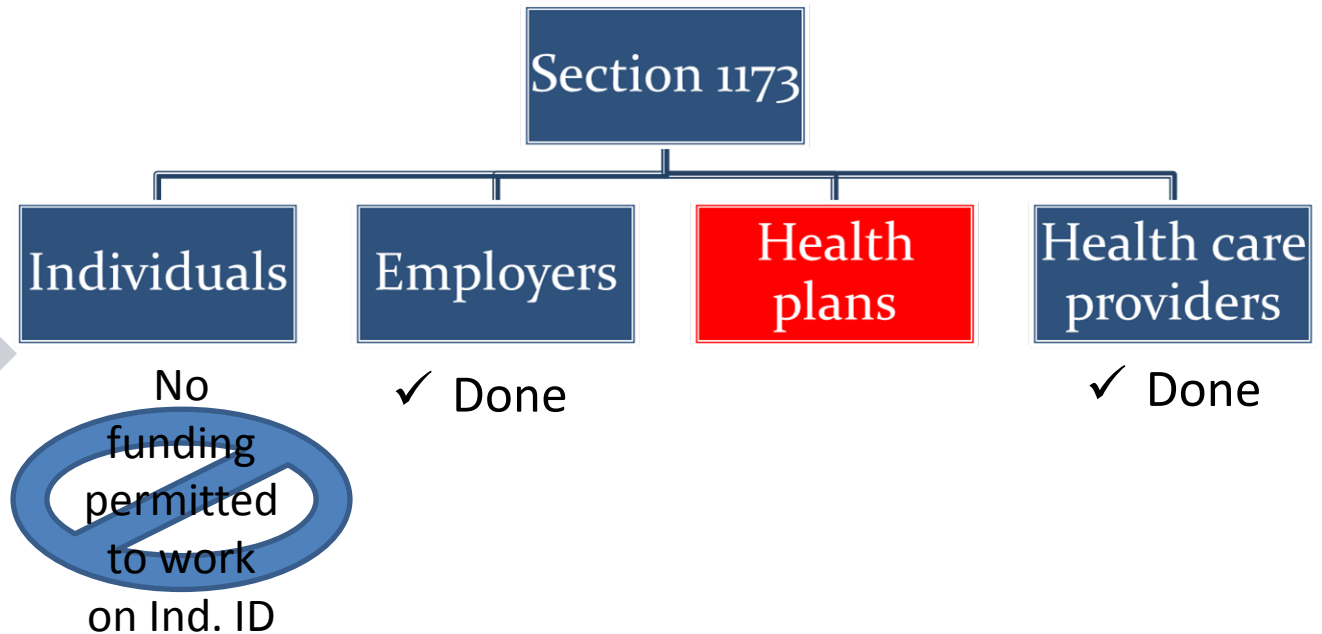
- Under the Office of Information of Technology (OIT) and Part of the Program Management Office
- Formerly known as the National Standards Group (formerly known as the Office of eHealth Standards and Services)
- Still responsible for the adoption and enforcement of standards, operating rules, code sets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

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



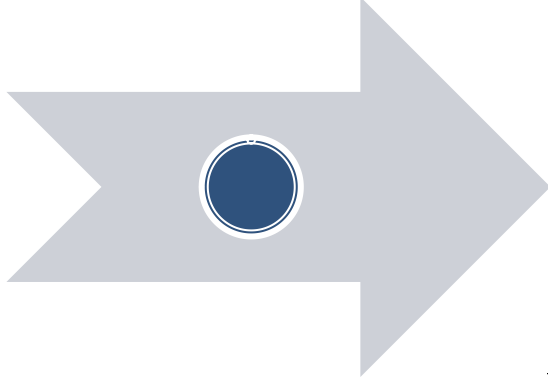
# Re-cap on Identifiers ... Just in Case Health Insurance Portability and Accountability Act (HIPAA) 1996

1996



# Plan Identifier – “It’s Complicated”

2005



WEDI Policy  
Advisory Groups

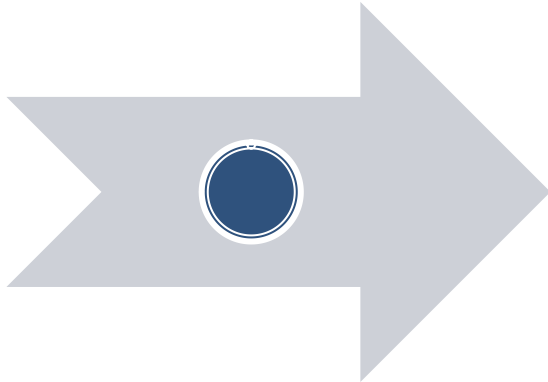


Research

Industry Meetings

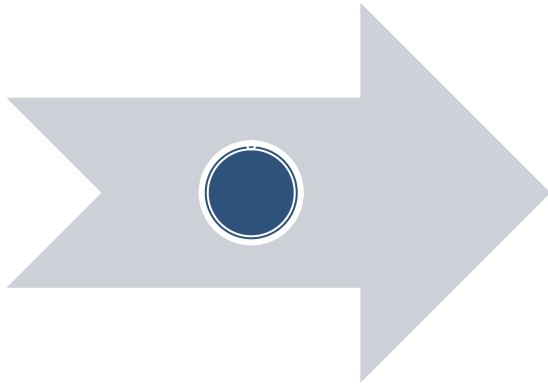
# Affordable Care Act (ACA) 2010

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



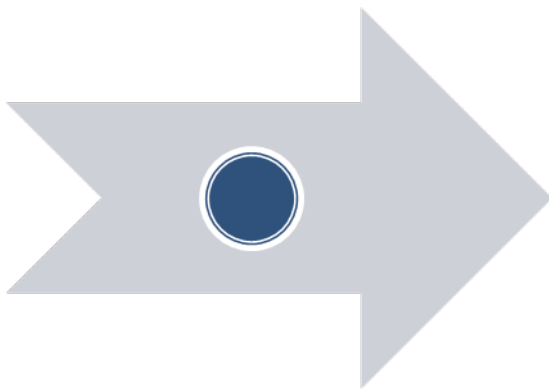
## Recommendations:

- 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**



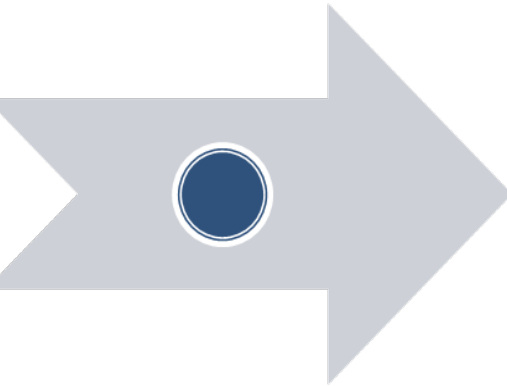
- Required for use in standard transactions to identify a health plan that has an HPID
- Allowed for use for other lawful purposes

# Health Plan Identifier Final Rule (2)

Created new definitions for enumeration purposes:

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

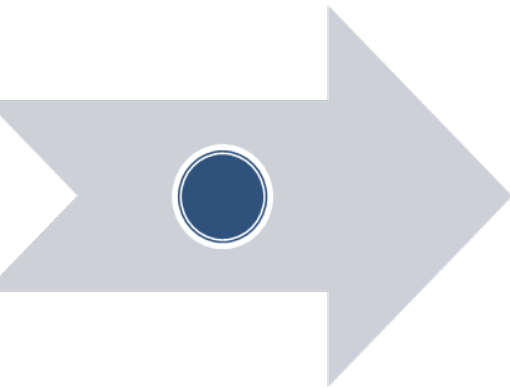
2012



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

# Health Plan Identifier Final Rule (3)

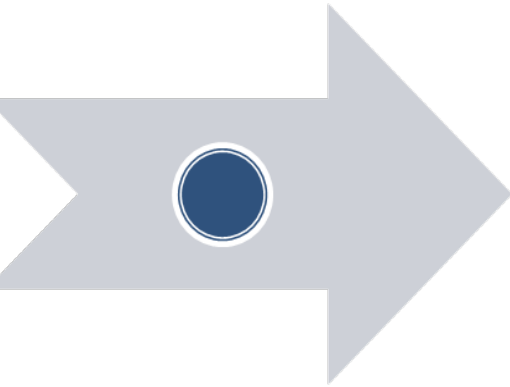
**2012**



| 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**



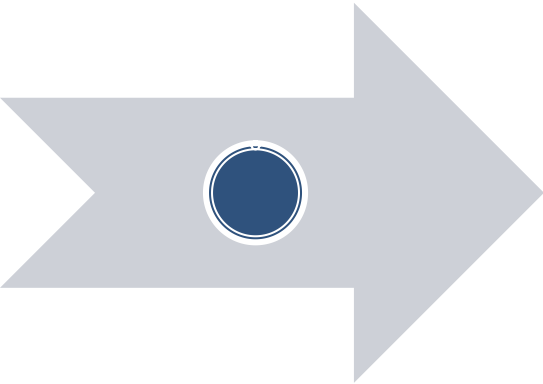
- Created a voluntary Identifier- Other Entity Identifier (OEID)

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

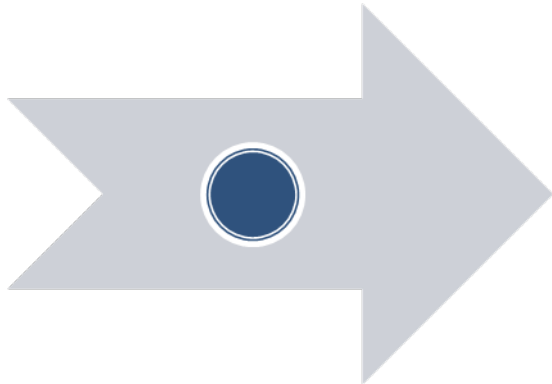
2014



- 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

