February 19, 2019

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8013
Baltimore, Maryland 21244-8013
Submitted electronically via www.regulations.gov

RE: Administrative Simplification: Rescinding the Adoption of the Standard Unique Health Plan Identifier and Other Entity Identifier (CMS-0054-P)

Dear Administrator Verma,

The National Association of Dental Plans (NADP) appreciates the opportunity to comment on the proposed rule “Rescinding the Adoption of the Standard Unique Health Plan Identifier (HPID) and Other Entity Identifier” published in the Federal Register on December 19, 2018.

NADP supports the proposal to rescind the HPID regulation, which would remove the requirement for plans to obtain or use HPID in electronic administrative transactions.

We understand that part of the HPID implementation was intended to solve routing issues identified around the time of passage and implementation of Health Insurance Portability and Accountability Act of 1996 (HIPAA). While this may have necessitated exploration at that time, currently, the healthcare industry does not experience routing issues. The payer ID routing system works. Any HPID requirement to be used in the transactions would constitute a step back in this progress.

We are concerned that use of the HPID would impact provider payment timing and cause potential privacy and security risks, including PHI breaches. Implementing HPID in transactions will cost significant system dollars and, given the lack of need, constitute a waste of resources. We believe that there is no benefit to using HPIDs in transactions and would only hurt the industry including providers, vendors, clearinghouses and payers. The current industry routing and flow process using the Payer IDs address original concerns that may have prompted creation and use of the HPID.

NADP appreciates the opportunity to provide our comments on the proposed rule. For any follow up, please feel free to contact me or NADP’s Dental Informatics Manager Brian Flynn at bflynn@nadp.org or 972-458-6998 x109.
Sincerely,

Eme Augustini
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NADP Description
NADP is the largest non-profit trade association focused exclusively on the dental benefits industry. NADP’s members provide dental HMO, dental PPO, dental Indemnity and discount dental products to more than 195 million Americans with dental benefits. Our members include the entire spectrum of dental carriers: companies that provide both medical and dental coverage, companies that provide only dental coverage, major national carriers, regional, and single state companies, as well as companies organized as non-profit plans.