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February 8, 2019

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-0054-P
P.O. Box 8013
Baltimore, MD 21244-8013

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

Dear Administrator Verma:

On behalf of the physician and medical student members of the American Medical Association (AMA), I am pleased to submit the following comments in response to the proposed rule regarding the rescinding of the adoption of the standard unique health plan identifier (HPID) and other entity identifier (OEID). The AMA supports the rescinding of the use of the HPID and OEID in standard electronic transactions.

The AMA appreciates CMS' recognition that the organization that needs to be identified in a Health Information Portability and Accountability Act (HIPAA) transaction, is the payer rather than the health plan. Physicians need to know which organization should receive an inquiry about a patient's eligibility for services or which entity should receive the health care claim transaction. This organization is the payer, and information exchange systems are generally programmed to identify payers in HIPAA-mandated transactions.

Furthermore, it would be a costly, complicated, and burdensome disruption for the health care system to have to implement the HPID, because it would require mapping existing Payer IDs to HPIDs. This process would be complicated, with the potential for wide-scale misrouting of claims and other transactions.

The AMA appreciates the opportunity to provide comments and fully supports the rescinding of the adoption and required use of the HPID and OEID in electronic transactions. We applaud the administration's efforts to remove unnecessary administrative burdens on the health care system.

Sincerely,

A handwritten signature in black ink that reads "James L. Madara". The signature is fluid and cursive, with the first name "James" being particularly prominent.

James L. Madara, MD