



# AMERICAN BENEFITS COUNCIL

February 19, 2019

*Submitted electronically via <http://www.regulations.gov>*

Centers for Medicare & Medicaid Services  
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 Sir or Madam:

I write on behalf of the American Benefits Council (“Council”) to provide comment in connection with the proposed rule to rescind the adopted standard unique health plan identifier (HPID) published in the *Federal Register* on December 19, 2018, by the Department of Health and Human Services (“the Department”) (83 Fed. Reg. 65113).

The Council is a public policy organization representing principally Fortune 500 companies and other organizations that assist employers of all sizes in providing benefits to employees. Collectively, the Council’s members either sponsor directly or provide services to health and retirement plans that cover more than 100 million Americans.

The Council strongly recommends that HHS finalize the proposal to rescind the HPID.

As discussed in our comment letter on the HHS Request for Information Regarding the Requirements for Health Plan Identifier, the Council agreed with the National Committee on Vital and Health Statistics’ 2014 recommendation to eliminate the HPID in administrative transactions, based on extensive testimony by a broad range of covered entities and other stakeholders.

Our previous comment letter highlighted the confusion among employer plan sponsors as to why the HPID is needed and, if required, how the HPID would or should be used. HIPAA-covered entities are able to sufficiently identify the payer and any other information

needed to process standard transactions under the existing Payer ID framework. While the HPID may have been a useful identifier when the standard transaction requirements were first introduced, it is no longer necessary and would serve as an impediment to the uniform transmission of information, undermining the very goal of the administrative simplification rules.

\* \* \*

Thank you for considering these comments. If you have any questions or would like to discuss these comments further, please contact me at (202) 289-6700.

Sincerely,

A handwritten signature in black ink that reads "Kathryn Wilber". The signature is written in a cursive, flowing style.

Kathryn Wilber  
Senior Counsel, Health Policy  
American Benefits Council