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*Creative Health Benefits Solutions for Today, Strong Policy for Tomorrow*

February 19, 2019

*Submitted electronically via: [www.regulations.gov](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: CMS-0054-P – Administrative Simplification: Rescinding the Adoption of the Standard Unique Health Plan Identifier and Other Entity Identifier**

Dear Sir or Madam:

The National Business Group on Health appreciates the opportunity to comment on the proposal to rescind the adopted standard unique health plan identifier (HPID) and the implementation of specifications and requirements for its use and the other entity identifier (OEID) and implementation specifications for its use.

The Business Group represents [433 primarily large employers](#), including 74 of the Fortune 100, who voluntarily provide health benefits and other health programs to over 55 million American employees, retirees, and their families. Our members employ and provide health coverage under a wide variety of arrangements, including full-time, part-time, seasonal, and temporary. They often have multiple lines of business in multiple locations and tailor employee work and benefit plans to the specific needs of each line of business.

As our members continue to comply with HIPAA regulations and other group health plan requirements, a primary concern will be minimizing the administrative and cost burdens associated with those requirements. Allowing plan sponsors flexibility to adapt their regulatory compliance to existing benefit and administrative arrangements will reduce these burdens and allow plan sponsors to devote more resources toward maintaining and improving health benefits for their employees. Therefore, we support HHS's efforts to take into account the National Committee on Vital and Health Statistics's (NCVHS's) recommendations regarding use of the HPID and changes in the national's health care system such as implementation of the Affordable Care Act.

However, as we noted in our prior [comment letter](#), our members remain concerned that the HPID final rule does not take into account the administrative structures of large, self-insured group health plans. Often, large, self-insured group health plan sponsors will not perform most health care transactions such as eligibility determinations, claims status, or EFT and remittance advice

and instead engage third party administrators to perform these functions on their behalf. Complying with the HPID final rule would involve new administrative procedures as well as extensive coordination with multiple third-party administrators—an administrative and cost burden that would outweigh the utility of the HPID. **Therefore, we support HHS’s proposal to rescind the HPID and OEID rules.**

Thank you for considering our comments. Please contact me or Debbie Harrison, the National Business Group on Health’s Assistant Director of Public Policy, at (202) 798-4421 if you would like to discuss in more detail.

Sincerely,

A handwritten signature in black ink that reads "Brian Marcotte". The signature is written in a cursive style with a long, sweeping underline.

Brian Marcotte  
President