



Office of HIPAA Electronic Transactions, Code Sets, & Identifiers

Skyline 5, Suite
810
5111 Leesburg
Pike
Falls Church, VA
22041-3206

Please send any
comments and
questions to

HIPAAATCSIMail
@tma.osd.mil

NCVHS Observations and Recommendations to HHS

In July 2010, the National Committee on Vital and Health Statistics (NCVHS) held hearings to receive testimony from industry stakeholders regarding two Administrative Simplification provisions under the Patient Protection and Affordable Care Act (PPACA); Operating Rules to support standard transactions for eligibility and claim status and the establishment of a national Health Plan Identifier (HPID) for health plans. As a statutory advisory committee to the Secretary of the Department of Health and Human Services (HHS), NCVHS submitted two letters to the Secretary which included observations and recommendations regarding each provision.

As a result of the July hearings, NCVHS developed six observations and recommendations regarding Operating Rules authoring entities and Operating Rules for eligibility and claim status transactions; (1) naming Operating Rules authoring entities, (2) adopting Operating Rules for eligibility and claim status transactions, (3) content of Operating Rules, (4) use of companion guides, (5) coordination between Operating Rules authoring entities and standards development organizations, and (6) certification of compliance with Operating Rules.

With respect to the six observations, key recommendations to HHS included:

- Continue to use NCVHS and its open process
- Adopting the Council for Affordable Quality Healthcare (CAQH) Committee on Operating Rules for Information Exchange (CORE) Phase I and Phase II Operating Rules for non-retail pharmacy eligibility and claim status transactions
- Require that the CAQH CORE Phase I and II not be altered until a new version is adopted
- Adopt National Council for Prescription Drug Programs (NCPDP) operating rules for retail pharmacy-related eligibility transactions
- Designate Operating Rules authoring entities as Designated Standard Maintenance Organizations (DSMOs) and require their participation in the DSMO
- Designate Centers for Medicare and Medicaid Services (CMS) as a non-voting participant in the DSMO Committee
- Require CMS to develop a certification process for all standards, implementation specifications and Operating Rules following PPACA legislation.
- NCPDP and CAQH CORE be named as the two authoring entities for the Operating Rules.

NCVHS also made key recommendations to HHS regarding the HPID. These include:

- Clarifying the definition of entities eligible for enumeration with an HPID by working with stakeholders to reach consensus on names and definitions
- Determine levels of entity enumeration
- Adopt an HPID that follows the ISO Standard 7812, with Luhn check-digits as the tenth digit and that contains no embedded intelligence
- Provide sufficient time and guidance for testing the HPID in transactions prior to use
- Consider that the effective date of October 1, 2012 be interpreted as the date to begin registering for an HPID to allow more time for enumeration and testing before a final implementation date when the HPID must be used in compliant transactions. This would also ensure sufficient time for publication of the regulation and development of the enumeration system and process. Phases should include:
 - Enumeration: October 1, 2012 – March 31, 2013
 - Testing: April 1, 2013 – September 30, 2013
 - Implementation: October 1, 2013

To view all recommendations by NCVHS regarding operating rule entities, please [click here](#).

To view all recommendations by NCVHS regarding the HPID, please [click here](#).

