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This is a Comment on the **Centers for Medicare Medicaid Services (CMS) Proposed Rule: Requests for Information: Requirements for the Health Plan Identifier**

Comment Period Closed  
Jul 28 2015, at 11:59 PM ET

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## Comment

The National Association of Dental Plans (NADP) appreciates the invitation to comment on the use of the HPID in Health Insurance Portability and Accountability Act (HIPAA) transactions in conjunction with the Payer ID.

The dental benefits industry understands that part of the HPID implementation was intended to solve routing issues that were identified in the original HIPAA law in 1996. Maybe this was needed 20 years ago but currently the healthcare industry does not experience routing issues as the payer ID routing works just fine. Any HPID requirement to be used in the transactions will be a step back. There is unanimous concern by our members that use of the HPID will impact provider payment timing and cause potential privacy and security risks, including PHI breaches. Implementing HPID in transactions will cost significant system dollars and waste resources. The group consensus remains that there is no benefit to using HPIDs in transactions. The current routing and flow process works using the Payer IDs created in the industry. Using HPIDs would only hurt the industry including providers, vendors, clearinghouses and payers.

NADP is a nonprofit trade association representing the entire spectrum of the dental benefits industry. Our members include national commercial carriers, regional and single state plans, companies organized as notforprofit service plans, interested individual members, dental practice management companies and supporting member organizations that provide products & services to the dental benefits industry. NADP serves as the representative and recognized resource of the dental benefits industry.

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