



January 31, 2019

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 Administrator Verma:

The North Carolina Healthcare Information and Communications Alliance, Inc. (NCHICA) is a nationally-recognized, nonprofit consortium that serves as an open, effective, and neutral forum for health information technology and policy initiatives that improve health and care. The consortium represents most sectors of the healthcare industry. Specific to this proposed rule, representatives of payers, providers, lab companies, public health, EHR vendors, researchers, and others that will be affected by the rule change participated in the discussions and our consensus position articulated below.

NCHICA's Transactions, Code Sets, and Identifiers (TCI) Workgroup reviewed the proposed rule proposing to remove Subpart E—Standard Unique Health Identifier for Health Plans at 45 CFR 162, as well as the definitions of "Controlling health plan" (CHP) and "Subhealth plan" (SHP) at 45 CFR 162.103. The purpose of the TCI Workgroup is to understand, address, respond, and provide educational assistance as appropriate to the healthcare community for ongoing compliance with the administrative simplification provisions of HIPAA under Parts 160 and 162.

Upon review and discussion, NCHICA's TCI Workgroup applauds the effort of the Department to fully understand the challenges of a Standard Unique Health Identifier for Health Plans and the discretion with which it is implementing the requirements of the Affordable Care Act in the spirit of administrative simplification. We agree with the findings and endorse this proposed rule as written.

Sincerely,



Jennifer Anderson, MHSA, PMP  
Executive Director