



LEGAL ADVICE FOR HEALTH PLANS

HEALTH LAW ALERT

October 28, 2019

HHS Repeals Health Plan Identifier “Other Entity” Identifier Also Repealed

The Department of Health and Human Services formally¹ published its repeal of the Rule that requires covered entities to use Health Plan Identifiers (HPIDs) and Other Entity Identifiers (OEIDs) when electronically conducting standard transactions, such as eligibility inquiries and responses, claim submissions, claim status, and remittance advice. The repeal comes as no surprise, as the Department announced that it would not enforce the rule shortly before it went into effect five years ago. ([Click here](#) for my Health Law Alert on the subject.)

The Department explained that “industry stakeholders, in particular, health plans, identified a number of implementation challenges with [and] barriers to implementation of the HPID.” Among other things, stakeholders argued that “the HPID was not needed for routing HIPAA transactions [and it did not] provide information about health plan products and benefits [as had been hoped].” As a result, the HPID “would not reduce the cost of managing financial and administrative information, and [in fact] would impose significant costs instead of decreasing them.” Similar concerns were expressed about the OEID. The Department therefore concluded that the HPID and OEID were not necessary, resulting in this repeal of the Rule.

The final Rule (which rescinds the HPID and OEID Rule) is published at 84 *Federal Register* 57621 ([click here](#)). [Click here](#) for my compilation of the HIPAA-Administrative Simplification Rules incorporating the rescinded HPID and OEID Rule (*see* first bullet under “Compiled Rules”) (or see the “Resources” page at tbixbylaw.com).

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¹ The Department informally published the repeal of the Rule and released them to the public on October 25 when it was filed with the Office of the Federal Register.

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