



Transaction Policy Advisory Group

Comments on the Health Insurance Reform: Standards Unique Employer Identifier (CMS-0047-F)

June 11, 2002

Please Note: These comments represent a summary of the industry attendee's and member's discussions and recommendations. The WEDI Board of Directors has not reviewed them. This review will occur the week of June 27, 2002. A final report of the board-approved recommendations to the Secretary of HHS will be published as appropriate.

Health Insurance Reform: Standards for Electronic Transactions (CMS-0047-F)

Section Code	Issue	Comment	Page	Col.
162.605	Standard Identifier	Wedi supports the Secretary's adoption of the EIN as the standard unique employer identifier. Approved	38020	1
III. Comments and responses concerning proposed revision Subsection A. Employer Identifier Standard	Format – requirement that the hyphen must be transmitted as part of the EIN	<p>Wedi's Letter of Comment 8/14/1998 recommended that the hyphen in the EIN be edited out for transmission purposes. Wedi believes the transmission of the hyphen could create issues for those transmitting the data. Therefore, Wedi believes that our original recommendation is appropriate.</p> <p>The EIN is an element in many of the HIPAA transactions and the implementation Guides recommend removal of special characters (e.g., hyphen). Therefore, the EIN rule conflicts with the Transactions Implementation Guides. Many payers and providers have already begun programming their systems based on the Transactions and Code Sets Implementation Guides.</p> <p>Some vendors would need to reprogram their systems. Many of the current HIPAA products would need to be changed to comply with the EIN rule. Thus, adding cost.</p> <p>Wedi recommends the removal of the hyphen for transmission purposes. Approved – Unanimously; Suggest sending as a comment to HHS and also recommend submitting the issue through the DSMO process.</p>	38011	3