Health Identification Card Implementation Guide

This implementation guide specifies WEDI’s Health Identification Card Implementation of the American National Standard, Identification Cards—Health Care Identification Cards, INCITS 284 as revised. INCITS is accredited by ANSI.

~ Version x.x ~
~ August 1, 2007 ~
Status of this Implementation Guide

This copy is a working draft. It is presently being amended and edited by the WEDI Health ID Card Sub-Workgroup. The Sub-Workgroup is also being advised by an ad hoc Health Identification Card Major Stakeholders Panel that WEDI established to address technology and bank-card issues raised about the 2006 draft. The August 22, 2007, WEDI forum in Fairfax Virginia will base discussion on this draft. We anticipate a September 1, 2007, draft with changes following the forum, and the September 1st draft will be presented to the WEDI Board of Directors for approval in mid-September.

Comments may be sent to HealthID@wedi.org.

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This document contains a number of quotations or paraphrases from the underlying standard, INCITS 284, which is copyright by the Information Technology Industry Council (ITI).
Health ID Card Implementation Guide Forum
Hyatt Fair Lakes, Fairfax, Virginia
August 22, 2007, 8:00 AM to 4:00 PM

Purposes of the Health ID Card Forum. The purposes of this forum are to present a guided tour of the 2007 WEDI Health ID Card Implementation Guide, to hear your detailed suggestions and concerns before the WEDI Board of Directors decides on approval in September, and to plan an implementation campaign that is both voluntary and effective.

This is your opportunity to learn the details and simplicity of the standard card, and to help plan implementation. You will be given a copy of this WEDI implementation guide. The forum addresses:

- **The Card.** Learn the reasons for choice of technology and data content. Learn how the pressing need for a standard health plan identifier was solved, how a single card may serve multiple types of benefits, how the same card can be combined with a bank card to settle patient balances, how cards can be keys to electronic health records, how one standard supports cards issued by providers, plans, and other entities such as RHIOs, health data banks, blood banks, authorized enumerators, and others.

- **The Implementation Campaign.** Join the effort. Learn how WEDI is introducing this card for voluntary implementation. Hear the experiences of health plans and pharmacy benefit managers implementing the card. Hear what the consumer wants and what the provider wants. What does a card issuer have to do? How are banks involved? What does a provider have to do? What do vendors need to do? How is the card used manually? ...or automatically through direct data entry? ...or automatically through integration with a provider’s system? Learn the economic strategy for implementation. Critique timeline estimates. Decide what it can do for your organization.

- **How you can help.** Most importantly, this forum is interactive. WEDI wants to hear your needs, your concerns, and your suggestions before approving the final guide. Tell us what you really think. We need you there.
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Health Identification Card Implementation Guide

1.0 PURPOSE, SCOPE, IMPLEMENTATION STRATEGY, GENERAL INFORMATION

1.1 Purpose of This Implementation Guide

The intent of this implementation guide is to enable automated and interoperable identification using standardized health identification cards. The guide standardizes present practice and brings uniformity of information, appearance, and technology to the over 100 million cards now issued by health care providers, health plans, government programs, and others.

A card serves as an access key to obtain information and initiate transactions. It is used by a consumer to convey identification to providers or others. A card may convey patient identifiers to providers. It may convey insurance identifiers for multiple benefits involving different administrators on a single card. It may combine bank and health ID cards.

1.2 The Underlying ANSI Standard

This implementation guide specifies WEDI’s Health Identification Card implementation of the American National Standard, Identification Cards—Health Care Identification Cards, INCITS 284 as revised. INCITS is accredited by ANSI. The standard is an application of International card standards (ISO Standards) to health care applications in the United States.

1.3 Scope of This Implementation Guide Is Identification

The scope of this Implementation Guide is to convey identification. It is an access key for obtaining information and enabling transactions. For example, although the card may facilitate access to a medical record, the guide does not specify the data content from that record. It does not specify diagnostic, prescriptive, encounter, bio-security, non-identifying demographic, or other data about the cardholder. It specifies identifiers, and it permits other information.

1.4 Types of Health Identification Cards (Examples only, not specifications)

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<table>
<thead>
<tr>
<th>Hospital LOGO &amp; Name</th>
<th>Health &amp; Drug Card Logo</th>
<th>Combo Bank &amp; Insurance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example of Provider-Issued Repeat Admission Card</td>
<td>Example of Health &amp; Drug Multi-Benefit Card</td>
<td>Example of Combined Bank &amp; Insurance Card</td>
</tr>
</tbody>
</table>

These examples are illustrations only. Placement of information may be flexible within limits described in this guide. Refer to 3.6 and 5.1.

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1 Definition: an Implementation Guide applies a standard to specific uses. A standard frequently offers more capability than may be needed for the use. This Implementation Guide focuses the health ID card standard to needs of health care providers and health plans or payers for identification. For example, a hospital may issue a card to identify a recurring patient. A plan may issue a card to identify an insurance plan and subscriber. A RHIO may issue a card to identify a patient’s consolidated medical records.

2 Revision of INCITS 284 is expected year-end 2007. This guide is premised on that revision.
This implementation guide specifies different types of health ID cards, including the following:

<table>
<thead>
<tr>
<th>Type of Card</th>
<th>Card Issuer ID*</th>
<th>Essential Required Information</th>
<th>Cardholder Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4.1 Provider-issued card for repeated admission or treatment</td>
<td>Standard National Provider Identifier (NPI)*</td>
<td>Patient or Medical Record ID.</td>
<td>Name of Patient.</td>
</tr>
<tr>
<td>1.4.2 Health Benefit or Insurance card.</td>
<td>Standard PlanID* described in 3.4.</td>
<td>Subscriber ID or Member ID assigned by plan.</td>
<td>Name of Subscriber or Member; see 3.2.</td>
</tr>
<tr>
<td>1.4.3 Health ID &amp; Bank Combination card.</td>
<td>Bank card with health ID card information added.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.4.4 Other Health ID card.</td>
<td>Standard Trading Partner ID described in 3.4.</td>
<td>ID for person, record, or other object, assigned by issuer.</td>
<td>Name of cardholder, that is, person, record, or other object being identified.</td>
</tr>
<tr>
<td>1.4.5 Card Assigning ISO Stnd U.S. Healthcare ID such as for Atypical Provider</td>
<td>Standard ID for entity that is card issuer</td>
<td>Standard ID for cardholder such as an Atypical Provider</td>
<td>Name of cardholder such as an Atypical Provider</td>
</tr>
</tbody>
</table>

* This implementation guide specifies card issuer numbers to be ISO Standard U.S. Health Care Identifiers issued under authority of ISO Standard 7812. For example, the National Provider Identifier (NPI) is such a number. Refer to 3.4 for more complete description.

Illustrations in this implementation guide are examples of compliant cards. The guide’s requirements allow significant variation from these examples.

1.4.1 Provider-issued card for repeated admission or treatment (Refer to 3.0 and 8.0)

A typical provider-issued card is for identification of the patient who is admitted or treated repeatedly such as for rehabilitation or other treatment. On readmission, the patient presents the card so that completely accurate identification on the card allows the patient and provider to avoid a full admission process and to identify the patient’s medical records.

Essential information consists of (1) Patient Name, (2) Patient or Medical Record ID (either proprietary or standard), and (3) National Provider Identifier (NPI). Refer to 3.0 and 8.0.

---

3 A standard Trading Partner ID is an ISO Standard U.S. Healthcare Identifier for a clearinghouse, billing service, provider network, RHIO, public health reporting agency, or other entity that is not identified with an NPI or PlanID. Some health plans, while identified by PlanID, also use a Trading Partner ID to identify an EDI portal.
1.4.2 Health Benefit or Insurance Card (Refer to 3.0 and 5.0)

A health plan issues a health benefit card to a subscriber or a member, who presents the card to a health care provider to convey with accuracy and clarity the benefit identifying information that the provider needs in order to conduct transactions such as eligibility inquiry and claim submission. Refer to 3.0 and 5.0 for further detail.

Essential information consists of (1) Subscriber or Member Name, (2) Subscriber or Member ID, and (3) Standard Health Plan ID. Refer to 3.6 for placement options for essential information. The following example also illustrates some discretionary data elements in addition to the essential information.

1.4.3 Optional Health ID Card and Bank Card Combo (Refer to 3.0, 5.0, and 7.0)

This implementation guide permits, but does not require, a health identification card to be added on the same card to a standard credit or debit card. Essential information consists of standard bank card information plus health ID card information. The following is illustrative only. Refer to 3.0, 5.0, and 7.0 for detail.
1.4.4 Other Health ID Cards (Refer to 3.0 and 9.0)

Entities other than health care providers or health plans may issue health ID cards. For example, a Regional Health Information Organization (RHIO) may issue an ID card for access and maintenance of a patient’s consolidated medical records. Other examples include cards issued by Health Data Banks, Blood Banks, American Red Cross, Social Services, and others. Essential information consists of (1) Patient Name, (2) Either proprietary or standard confidential patient record ID, (3) Standard card issuer ID such as a RHIO. The following is an example. Refer to 3.0 and 9.0 for detail.

1.4.5 Standard Health ID Card to Assign Standard Identifiers (Refer to 10.0)

When an ISO Standard U.S. Healthcare Identifier is issued to an entity, the most convenient means to convey this identifier may be an identification card. The following is an example in which a health plan arranges for a standard Atypical Provider Identifier (API) to be assigned to an Atypical Provider and a card to convey the API to that provider. Essential information consists of (1) Standard Card Issuer identifier of the entity arranging the assignment (e.g. the Medicaid state plan), (2) Standard ID being assigned to the Entity, and (3) the Entity Name. The card issuer is a health plan, provider, or other trading partner authorized to arrange assignment of standard IDs such as to Atypical Providers. Refer to 10.0.
1.5 Essential Information Common to All ID Cards

Every ID card of any kind must convey two essential identifications:

1) **Card Issuer.** Identifies the authority or sponsor who is responsible for issuance of the card; in card language, this is called the *card issuer*. What is new for health care is identifying the card issuer with a *standard ID* rather than text. This is the most important new element for standardization of a health ID card. Machine-readability requires it.

2) **Cardholder.** Identifies the person, family, record, bank account, or other object being identified; in card language, the object being identified is called the *cardholder*. The cardholder is identified with two data elements:

   - **Cardholder ID.** An identifier for the cardholder. This ID has meaning within the context of the card issuer.
   - **Cardholder Name.** The name for the cardholder. Must correspond to the Cardholder ID; that is, both the ID and Name must identify the same person, family, record, bank account, or other object being identified.

Three examples showing card issuer and cardholder:

<table>
<thead>
<tr>
<th>Social Security Card</th>
<th>Bank Card</th>
<th>Minimum Health ID Card</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Social Security Card</strong></td>
<td><strong>Bank Card</strong></td>
<td><strong>Minimum Health ID Card</strong></td>
</tr>
<tr>
<td>SSN Card Does Not Need Card Issuer ID</td>
<td>Sixth-Ninth National Bank Credit Card</td>
<td>Health ID Card; Shows New Card Issuer ID</td>
</tr>
<tr>
<td>1. 6-digit IIN Bank Number Assigned under ISO 7812</td>
<td>2. Account Number and check digit</td>
<td></td>
</tr>
</tbody>
</table>
| John Q. Public | 422641 03448 0555C | Subscribe
| U.S. Citizen | June 09 10 | SUSAN B JONES-SMITH
| 1234567890 | 03 45 | ABC 2465-97531
| | | Bank Health Plan (8558) |
| | | 9210 557 898 |

a) **Social Security Card.** A Social Security Card identifies the Social Security Administration with text and the person with an ID. But because SSN is so ubiquitous, a card issuer *identifier* for the Social Security Administration is not included nor warranted.

b) **Bank Card.** A bank card identifies both the bank and the account at the bank. The first six digits of the card number identify the bank using an ID assigned internationally under ISO Standard 7812, the same standard used for NPI and *PlanID*. Processing of bank cards is easily automated because the bank is identified by this ISO standard identifier.

c) **Health Identification Card.** Until now, health identification cards identify the card issuer only with text, not with an identifier. As a result, processing of a health benefit card has required a person in the provider’s office to interpret the card, look up the health plan, and enter a code into the provider’s systems in order to instruct the provider’s systems who is the health plan and where to send transactions.

In this guide the Health Identification Card introduces a standard card issuer identifier, such as a NPI, *PlanID*, or trading partner identifier, which is assigned for U.S. health applications under authority of ISO Standard 7812. Systems are able accurately and instantly to determine transaction recipients from card issuer directory records.
1.6 Economic Benefits from a Machine-Readable Card with Standard Card Issuer ID

This section describes qualitative benefits that may be expected from machine-readable health identification cards as standardized in this implementation guide.

1) **For providers.** Machine-readable health identification cards (1) help to eliminate patient and insurance benefit identification errors, (2) reduce costs and aggravation of rejected claims, (3) reduce lengthy admission processes, and (4) contribute to smoother office procedures and patient satisfaction. (5) Significant reduction in claim errors will enhance provider relations with plans. (6) The costs of traditional photocopying the front and back of cards, manual lookup and data key entry of card information, and filing paper copies can be eliminated over time. (7) When integrated with enhanced provider systems, machine-readable identification cards will facilitate immediate automatic transactions such as eligibility inquiries. (8) Even in phone conversations, the simplicity of needing only two identifiers aids both patient and provider to convey insurance benefit information or medical record identification quickly with complete accuracy.

2) **For health plans and administrators.** Patient and insurance benefit identification errors significantly increase processing and service costs for plans; they aggravate providers; and they contribute to member dissatisfaction. Elimination of patient identification errors will benefit health plans: (1) to improve subscriber or member satisfaction, (2) improve employer and plan sponsor satisfaction, (3) reduce cost to return and subsequently reconcile claims with errors, (4) significantly reduce the cost of both provider and member help desks and administrative record searches, and (5) improve plan-provider relations. (6) In addition, the universal health plan identifier conveyed by the card is one ingredient for improved coordination of benefits. (7) With multiple-benefit cards, administrators and medium sized payers are able more easily to provide a convenient range of benefit plans to meet the needs of employers.

3) **For patients or consumers.** (1) Elimination of patient and insurance identification errors significantly reduces the hassle factor and increases patient and subscriber satisfaction. (2) Consumers desire simplicity, and they want a single card for multiple benefits and functions. This implementation guide, using only two identifiers, enables multiple benefits on a single card. (3) Patients can more easily and accurately read the essential identifiers from a card to a provider over a telephone. (4) It also permits an option to combine an insurance card with a bank card on the same card.

4) **For employers.** (1) Employers desire to improve employer-employee satisfaction and reduce costs. Elimination of patient and insurance identification errors increases employee satisfaction with the company’s benefit plans and reduces cost of helping employees resolve insurance benefit problems. (2) With a multiple-benefit card, employers are able more competitively to purchase multiple benefits using different administrators while presenting to an employee only a single, simple card.

5) **For clearinghouses.** (1) The standard health plan identifier conveyed by the card, connected with public-access directory, assists all-plan routing without requiring translation of trading-partner specific identifiers. (2) Reduction of errors will reduce expense and increase client satisfaction. (3) Multiple benefit cards enable clearinghouses to support increased value to providers.
1.7 Economic Strategy to Achieve Industry Implementation

In order for full value to be realized from cards specified in this implementation guide, three investments must be made:

1) **For Card Issuers** the investment is adoption of this implementation guide for cards when reissued, especially including the standard card issuer ID and machine-readable technology. A card issuer may need to issue standard cards in anticipation of future return. For a card issuer, the incremental investment at the time it is issuing cards anyway is only a marginal cost.

2) **For Card Users** the investment is primarily in the systems capability to process automatically the two identifiers on a standard card; so it is reasonable for a provider or other card user to desire a significant percentage of cards to be standard before justifying the investment. There are various potential levels of system capability that a provider may elect to install; for example:

   - The user may elect to defer any changes and operate the same as presently.
   - The user may use the two identifiers to populate Direct Data Entry screens.
   - The user’s system may accept and store the two identifiers for transactions.
   - The user’s system may machine-read the card information.
   - The user’s system may automatically generate standard transactions, such as eligibility inquiries and claims based on the two identifiers, which might be machine-read or entered manually (such as when received over the phone).

   For a card user such as a provider, the investment in system enhancement may be significant such that, to be justified, there must be reasonably high frequency of use although a plan or other entity may elect to fund some of the user’s investment.

3) **For Clearinghouses** the investment is to be able to access a publicly available directory and direct transactions to multiple payers and administrators depending on type of transaction and type of benefit. For a clearinghouse, the investment is the modest cost of merging information from a publicly accessible directory into its transaction logic.

When the card issuer is a provider, then the provider controls the environment for use of the cards and would determine ROI based on its own operations.

When the card issuer is a health plan or administrator, then:

- **Before providers implement machine-readability and integrate the card into their systems**, providers and plan may obtain a good portion of the error reduction potential, realize more error-free telephone communication of identifiers between a consumer and provider, and be able to combine multiple benefits on a single card.

- **After providers implement machine-readability and integrate the card into their systems**, the full return can be realized by plans, providers, employers, clearinghouses, and consumers described in 1.6.
• The key to success is therefore for health plans, as cards are reissued, to adopt this implementation guide now—especially including the standard card issuer ID and machine-readability—to help build a large industry population of standard, machine-readable cards. Providers will enhance their systems to obtain the returns from card standardization as the population of standard cards increases.

1.8 Other Principles of this Implementation Guide

1) Simplicity and Permitting Maximum Card Issuer Discretion

The design philosophy of this implementation guide and the underlying standard is that only the most essential information and format should be required. It should require the least information necessary. In general, any more information is discretionary unless explicitly disallowed or discouraged. The simplicity design principle maximizes flexibility by maximizing card issuer options. The design philosophy is premised on the assumption that a card issuer desires the best value for its card, and after meeting requirements, will effectively balance objectives of usefulness, simplicity, card life, and other factors. This guide encourages card issuers to accept the simplicity principle.

Important to simplicity for consumers, providers, plans, and other card users is uniformity and placement of information. For example, the two essential identifiers—card issuer and cardholder ID—should be adjacent to each other in predictable location as, for example, bank cards always place these two identifiers in the same location.

Simple Test of Simplicity. The simplicity test is the ease by which a consumer, coached by a provider over a telephone, is able easily and accurately to read the card’s printed information and convey the two essential identifiers and name to the provider.

2) Process Neutrality

The card should meet stakeholders’ needs. It should be neutral to the conduct of business. For example, it should permit but not require multi-functional cards. It should permit host and home plan structures, geographical or regional plan structures, provider networks, and any other such arrangement. It should support different types of benefit plans such as medical, dental, drug, vision, supplemental; and it should permit but not require combinations of benefit plans. It should have flexibility to permit new business structures and processes in the future, including potential financial transactions.

Its processes should be open, and supporting directories should be publicly accessible to responsible participants in healthcare electronic commerce.

3) Card Must be Effective for all User Environments

The card must work in all user environments regardless whether or not the user has system capability for machine readability.

4) This Implementation Guide and the Underlying Standard are Voluntary

The potential benefits to the health care industry—to patients, health care providers, and health plans—are very significant, especially from multiple functions, uniformity,
efficiency, automation, and error elimination; however, implementation of this guide is voluntary.\textsuperscript{4}

5) **Conformance**

A health identification card is in conformance with this Implementation Guide if it meets all requirements specified directly or by reference contained in this Implementation Guide and the underlying standard, INCITS 284 as revised. See 1.2. To this end, this implementation guide is designed to permit maximum user discretion within minimum requirements. Cards not conforming to all requirements are not in conformance.

6) **This Card is not a National Personal Identification Card**

This is not a national ID card. The individual, family, medical record, or other ID number on the card continues to be the same identifier that card issuers now put on their cards. Cardholder ID has meaning only in context with the card issuer identifier. This implementation guide does not require a national individual identifier.

7) **Limitations Imposed by this Implementation Guide**

The design philosophy in this implementation guide is to simplify; so this implementation guide permits a card to have only a single set of identifiers—one card issuer identifier and one cardholder identifier and name. Consequently, in order for a single card to combine benefits, each benefit employs the same set of identifiers, and when additional identifiers are needed in order to direct transactions for different benefits to different destinations, they are obtained from a cross-walk included in the card issuer identifier directory. To allow multiple sets of identifiers on a card would unacceptably confuse consumers and providers\textsuperscript{5}.

8) **Requirement for Machine-readability**

This implementation requires that a card include machine-readable technology, either Track 3 magnetic stripe and/or PDF417 2-dimensional bar code, specified in 12.0 and 13.0.

9) **Information and technology not Addressed in this Implementation Guide**

In general, information and technology not addressed in this guide is additional to what is required and is at the discretion of the card issuer.

10) **Information Sources Listed in Attachment A**

Refer to Attachment A for sources of the INCITS 284 standard, other implementation guides, legacy formats, code values, card issuer identifiers, and e-directory.

\textsuperscript{4} The authors recognize there are certain state regulations requiring the underlying standard of the NCPDP Implementation Guide, which includes the underlying standard by reference, for prescription drug plan identification cards. Also, Medicare Part-D guidelines are based on the NCPDP implementation guide, this implementation guide, and the underlying standard.

\textsuperscript{5} However, this guide makes exception for combined medical and drug benefit cards to facilitate transition of these cards to standard over a reasonable time. Refer to 6.0.
2.0 DEFINITIONS

- **health care identification card**: card used to identify the card issuer and cardholder to serve as an access key for obtaining information and initiating transactions.

- **card issuer**: authority or sponsor responsible for issuance of the card. Card issuers may include health care providers, health plans, Medicare, Medicaid state agencies, Medicaid HMOs, and other government agencies, health insurance companies, third-party administrators, self-administered plans, purchasing cooperatives, employers with multiple-payer plans, Regional Health Information Organizations (RHIO), ISO authorized standard identifier enumerators, and others.

- **cardholder ID and name**: individual, family, organization, record, account, or other object that the health identification card is identifying. The cardholder ID and cardholder name must correspond. If a cardholder ID identifies, say, the subscriber, the cardholder name must be the name of the subscriber; if the ID identifies a dependent, the cardholder name is the dependent. See 5.2 for cards issued to dependents.

- **numeric**: Digits 0 to 9.

- **special characters**: ! " & ' ( ) * + , - . : =

  However, a special character is removed from this category when the card issuer uses it as a delimiter in machine-readable technology.

- **alphanumeric**: Uppercase letters from A to Z, numeric characters, space, and special characters. Accented characters are permitted in printed names only and are not valid for machine-readable data; see 3.5.

- **front side of card**: Face of the card carrying printed information containing the card issuer and cardholder identifiers.

- **back side of card**: The opposite face from the front.

- **constant and variable information**: Constant information printed on a card is information that generally does not change from one card to another, for example, phone numbers, instructions, labels. Variable information—sometimes called personalized information—is information that varies from one card to the next, for example, identifiers and names.

- **information element**: a data element of variable information.

- **required, situational, discretionary, and recommended information**: Required means that in order to conform to this implementation guide, the information must be included. Situational means the information is required if the situation pertains, but it is discretionary otherwise. Discretionary means the information may or may not be included at the card issuer’s discretion. Recommended means the information is discretionary but inclusion is recommended to achieve the card’s objectives.

- **essential information**: Essential Information is a term used in this implementation guide to mean the variable information of (1) cardholder name, (2) cardholder identifier, and (3) standard card issuer identifier.
3.0 ESSENTIAL INFORMATION and DESIGN THAT IS COMMON TO ALL CARD TYPES

3.1 Conventions

1) Placement of variable information elements

Printed, variable information elements are located on the front side of the card. The back side generally contains constant information. However, except for essential information or where explicitly stated otherwise, the card issuer has discretion.

2) Labels

Labels are required when specified for the corresponding information element. Labels are generally smaller or less bold than information elements. Labels may be above, adjacent to, or below their corresponding information element so long as there is clear association.

3) Language

Labels and pre-printed information shall be in English. Redundant labels or other information may be repeated in another language in addition to English.

4) Character set

Except where otherwise specified, information elements are alphanumeric. See 3.5 for description of accented characters in printed names.

5) Date Format

Printed dates shall be mm/dd/yy, mm/yy, mm/dd/ccyy, or mm/ccyy. Date of birth should use 4-digit year.

6) Physical characteristics

Track 3 Magnetic stripe and PDF417 bar code technologies specify physical card characteristics by reference. Refer to 4.0, 12.0, and 13.0.

7) Embedded spaces in identifiers

It is good practice for printed identifiers, such as the card issuer identifier or the cardholder ID, to include embedded spaces or hyphens to assist readability; however, spaces or hyphens are not included in machine-readable identifiers on the card or in electronic transactions. They are not significant for identification; for example, identifiers of “123-456” and “123456” have the same value. Programs should remove spaces and hyphens.

8) Card Size

Card size is approximately 2.125 inches by 3.375 inches; however, exact dimensions are specified in the ISO identification card standards included by reference in the specifications for machine-readable technologies.
3.2 Cardholder Name

- **ID & Name are the Same Person.** By definition, the cardholder name shall correspond with the cardholder identifier. The cardholder name and identifier must identify the same person or other object. The two being the same is a defining attribute of the term, *cardholder*. See 2.0 Definitions.

- **Dependent Names.** Refer to 5.2 for description of dependent names.

- **Format.** The cardholder name must fit on a single line. In printed form, it must be formatted in sequence of: given name, initial, surname, and suffix, separated by spaces. A hyphen may be significant in a name; so it may be included in both printed and machine-readable forms. Punctuation, such as a period or comma, is discouraged. For example:

  JOHN Q SMITH JR
  D MICHAEL JONES
  JANE E MILLER-SMITH

- **Truncation.** If full name is too long for space available, this implementation guide recommends the following sequence to reduce the length of the name until it fits. This sequence retains the suffix, at least one initial for the given or middle name, whichever appears most important, and as much of the surname as space permits.

  - If the given name is more than an initial, truncate the middle name from the right as needed but leave at least the middle initial. Then if the name still exceeds the space, truncate the given name from the right as needed but leave at least its initial. If the name still exceeds the space, eliminate the middle initial.
  - If the given name began as only an initial, truncate the middle name from the right as needed but leave at least the middle initial. If the name still exceeds the space, eliminate the given name initial.
  - If both the given and middle names began as initials or empty, eliminate the middle initial.
  - If the name still exceeds the space, truncate the surname from the right as needed until the name fits.

- **Recommend Printed & Machine-Readable Names be the Same.** In order to reduce a source of confusion, this implementation guide recommends that where practical the printed and machine-readable cardholder names be the same. Exceptions include: (1) there may be less space available for a machine-readable name than a printed name; (2) accented characters are not permitted in machine-readable names (see 3.5); and (3) when combining a health card with a bank card, the names may be different (see 7.3).

- **Acceptability of Name on Transactions.** If components of a name must be truncated, this implementation guide recommends the card issuer accept either the name or truncated name on all transactions, including standard, paper, and DDE transactions.
3.3 Cardholder Identifier ("ID")

- **Defined by card issuer.** The cardholder identifier is defined by the card issuer.
- **Character set.** The cardholder identifier may contain alphanumeric characters; however, this guide recommends avoidance of such numbers that, when handwritten, may be confused with alphabetic characters such as letters O and I. Spaces, hyphens, and special characters may be printed for easier readability, but they shall not be significant for identification, are not to be included in machine-readable technology, and are ignored. However, if cardholder ID is an ASTM International Standard Patient Identifier, a period is permitted and significant.

3.4 Card Issuer Identifier

The card issuer identifier is an **ISO Standard U.S. Healthcare Identifier** assigned by an enumerator authorized under ISO/IEC Standard 7812©. The card issuer identifier is of the health care provider, health plan, government program, or other authority or sponsor responsible for issuance of the card.

The full card issuer identifier includes an implicit “80840” prefix.

\[
80840 \text{ NNNN NNN NNC}, \text{ where:}
\]

- 80840 = preprinted ISO prefix: “80” = health application, “840” = United States
- NNNN NNN NNC = NPI, National Provider Identifier
  - = PlanID, Standard Health Plan Identifier
  - = other, e.g. Standard Trading Partner Identifier
- C = check digit

**Check digit:** The check digit is the last digit of the identifier and is calculated on the full card issuer identifier, including the implicit “80840” prefix, as described in Attachment B.

**Spaces and hyphens:** Spaces shown are helpful for readability, but spaces or hyphens shall not be significant ID characters. For example, “1234 567 893” is same as “1234567893”.

**Standard Labels.** Refer to 5.1(4), 8.1, and 9.1 for standard labels.

3.5 Accented Characters Permitted in Printed Name only

Certain languages use diacritic characters which can have a mark placed over, under, or through a character, usually to indicate a change in phonetic value. These characters are referred to here as accented characters.

When accented characters are used in a person’s name, they have significance to the individual. However, a computer will not treat these characters as equal to their base character. For example, “Å” would not be the same as “A” to a computer.

Therefore, accented characters are permitted for printed names only. Machine-readable data should never contain accented characters, and the card issuer should substitute any accented character with its base equivalent in machine-readable data.

---

The originator of any transaction that carries the patient’s name should take steps to ensure that accented characters are not present within the transaction prior to transmission. Likewise, the processor of the received transaction should take steps to ensure that accented characters are not present in data used for validation. This guideline applies to both machine-read names and manually entered names.

3.6 Placement of Essential Information

The three information elements called Essential Information shall be located on successive lines together on the left front of the card, with no other information elements interspersed between them, in the sequence of either:

1. Cardholder Name or: 1. Card Issuer Identifier
2. Cardholder Identifier 2. Cardholder Identifier
3. Card Issuer Identifier 3. Cardholder Name

**Change from prior standard.** Prior versions of the underlying standard required the card issuer identifier to be listed first and the cardholder name last. This implementation guide and the underlying standard (INCITS 284) that is under revision will permit the card issuer to elect either sequence defined in this Section. Refer to footnote 2 at 1.2.

**Group health plan.** In the above example the card issuer elected to enumerate the standard card issuer identifier to be the group health plan. Refer to 5.3.

**Dependent names.** Refer to 5.2 for placement of dependent names.

**When Bank Card Account and Subscriber are the same.** Refer to 7.3 for placement of bank card and health cardholder names when they are the same.
4.0 DATA STRUCTURE FOR MACHINE-READABLE INFORMATION

This section describes the standard machine-readable data structure common to all cards specified in this implementation guide. Legacy formats are supported temporarily to facilitate transition of existing machine-readable cards to standard over reasonable time; refer to 4.6.

4.1 Standard Data Structure

<table>
<thead>
<tr>
<th>Data</th>
<th>Max Length</th>
<th>Format</th>
<th>Required?</th>
<th>Repeat</th>
</tr>
</thead>
<tbody>
<tr>
<td>Start Sentinel</td>
<td>1</td>
<td>Fixed</td>
<td>%</td>
<td>Required</td>
</tr>
<tr>
<td>Format Character</td>
<td>2</td>
<td>Fixed</td>
<td>&quot;WH&quot;</td>
<td>Required</td>
</tr>
<tr>
<td>Card Issuer Identifier</td>
<td>10</td>
<td>Fixed</td>
<td>Numeric</td>
<td>Required</td>
</tr>
<tr>
<td>Cardholder ID Number</td>
<td>20 (32 if ASTM Stnd)</td>
<td>Variable</td>
<td>Alphanumeric</td>
<td>Required</td>
</tr>
<tr>
<td>Field Separator</td>
<td>1</td>
<td>Fixed</td>
<td>^</td>
<td>Required</td>
</tr>
<tr>
<td>Cardholder Name</td>
<td>36</td>
<td>Variable</td>
<td>A/N composite</td>
<td>Required</td>
</tr>
<tr>
<td>Discretionary Data Loop:</td>
<td></td>
<td></td>
<td></td>
<td>Situational 0 to 99</td>
</tr>
<tr>
<td>Field Separator</td>
<td>1</td>
<td>Fixed</td>
<td>^</td>
<td>Required</td>
</tr>
<tr>
<td>Qualifier Code</td>
<td>2</td>
<td>Fixed</td>
<td>Alphanumeric</td>
<td></td>
</tr>
<tr>
<td>Qualified Data</td>
<td>30</td>
<td>Variable</td>
<td>Alphanumeric</td>
<td></td>
</tr>
<tr>
<td>End Sentinel</td>
<td>1</td>
<td>Fixed</td>
<td>?</td>
<td>Required</td>
</tr>
<tr>
<td>Longitudinal Redundancy Check, magnetic stripe only</td>
<td>1</td>
<td>Fixed</td>
<td>Any 7-bit combination</td>
<td>Required on magnetic stripe track 3</td>
</tr>
</tbody>
</table>

- **Format character.** This 2-character code indicates the structure of machine-readable data on the card. The same standard format is used regardless of technology. Advantages of this code include: (i) computer is able to determine the card is a health ID card, (ii) permits accommodation of temporary legacy formats, and (iii) permits the standard format to be changed, if necessary, in the future. Refer to Attachment A for legacy format references.

- **Variable Data Element Length and Delimiters.** Variable data elements are left justified and not padded with extra spaces to the right. The card issuer must ensure that no data element contains the field separator character ("^") or End Sentinel ("?").

- **Total Length.** Total number of characters depends on field length, presence of the discretionary data loop, level of error correction, and other technical factors. Refer to 4.5(3) for effect of error correction on length, and 12.0 and 13.0 for specific technology.

- **Date format.** Use ccyymmdd for all dates without spaces, slashes, or hyphens.


- **Cardholder identifier.** Assigned by card issuer. Maximum length of 20 and may not include spaces, hyphens, or other special characters. However, maximum length is 32 and period is significant if ASTM Patient Identifier (which is not used on benefit cards). (c.f. 3.3).

- **Cardholder name.** Name corresponding to cardholder identifier. Refer also to 3.2.
  - A hyphen is included when it is significant as when the surname is “JONES-SMITH”.
  - The machine-readable cardholder name may not include accented characters (c.f. 3.5). Accented characters must be replaced by their base character values.

---

7 The number of iterations is limited by the capacity of the machine-readable technology.
Cardholder name is a composite data element consisting of Surname “/” Given Name “/” Middle Name “/” Suffix, in which “/” is delimiter between components of the name. For example, “JOHN Q PUBLIC JR” is “PUBLIC/JOHN/Q/JR”.

- Use surname when a person has only a single name.
- No component may contain the delimiter, “/”. A double middle name is 1 component.
- Remove leading and trailing spaces from all components.
- Empty fields are null. For example, “JOHN PUBLIC JR” is “PUBLIC/JOHN///JR”.
- Do not end with delimiters. For example, “JOHN PUBLIC” (no middle name, no suffix) is “PUBLIC/JOHN”.

### 4.2 Discretionary data loop

The discretionary data loop is included only when one or more information elements that may be carried in the loop are needed. Each entry, if any, in the discretionary data loop consists of three elements: a field separator, a qualifier code, and qualified data.

The Health Care ID Card Qualifier Code List is an external code list subject to change. Refer to Attachment A for how to obtain current list. As of the date of publication of this Implementation Guide, valid code values are as follows; however, more values may be added at any time. Any one qualifier code value may occur in the discretionary loop only once.

<table>
<thead>
<tr>
<th>Qualifier code</th>
<th>Occurs</th>
<th>Description</th>
</tr>
</thead>
</table>
| **Cardholder and Dependent Name, DOB, Gender (see 6.5 for qualifier code explanation)**

| PD, P1-P9 | 0-1 | Person or Dependent Code; c.f. 4.3. |
| N1-N9 | 0-1 | Dependent Name, composite format same as cardholder name |
| DB, D1-D9 | 0-1 | Date of birth of cardholder or dependent. Format ccyymmdd |
| GC, G1-G9 | 0-1 | Gender code: “1” = male; “2” = female |

| **Additional Cardholder Identification**

| GR | 0-1 | Proprietary Account or Group number, required if necessary for identification and differs from card issuer ID. See also “RG” code. |
| A1 | 0-1 | Address line 1 |
| A2 | 0-1 | Address line 2 |
| CY | 0-1 | City |
| ST | 0-1 | State |
| ZP | 0-1 | Zipcode, 5 or 9 digits; no hyphens or spaces |

**Data for Drug Benefits (Refer to 6.0 for Prescription Drug Benefit Card Exception)**

| RG | 0-1 | Proprietary drug group number; included if card combines medical and drug coverage and this ID differs from the card issuer ID and from Group Number (“GR”) above. If “GR” is for the medical plan, but is null for the drug plan, include “RG” followed by null data value. |
| BN | 0-1 | Drug benefit manager identification number (BIN). |
| PC | 0-1 | Drug processor control number. |
| RI | 0-1 | Drug cardholder ID: included if card combines medical and drug coverage and this ID differs from the “Cardholder Identification Number” in the 4.1 table above. |

**Dates**

| DI | 0-1 | Date Card Issued. Format ccyymmdd. Used for card version. |
| DX | 0-1 | Date Card expires. Format ccyymmdd. |
| DE | 0-1 | Date benefits became effective. Format ccyymmdd. |

**Other Data**

| PP | 0-1 | Individual NPI of primary care physician |
| PN | 0-1 | Name of primary care physician |
| WB | 0-1 | Web site domain name; “www.” not necessary. |
4.3 Person or Dependent Code

The discretionary data loop is structured to permit names and other information for up to 9 dependents. Dependent names are composite fields following the same format and truncation logic as for cardholder name. Refer to 3.2 and 4.1.

Note qualifier codes for dependents include a number from 1 to 9. In many cases 1 to 9 may correspond to the number by which the plan’s adjudication system identifies the dependent, and no Person or Dependent code is needed. But sometimes it only serves to group related name and other data together on the card for a given dependent such that the adjudication number for the person is specified by the Person or Dependent code. For example, say the adjudication number for a dependent is “22”, then the dependent might be identified by P5, N5, D5, and so forth, and P5 = 22. Use multiple cards if more than 9 dependents.

“PD” is not required if the subscriber adjudication identifier is zero or not needed by the plan. “P1” to “P9” is not required if the dependent adjudication identifier corresponds respectively to the 1 to 9 used in N#, D#, or G# codes for dependent information.

4.5 Example of Machine-Readable Data

The following example illustrates how data should be represented in the standard machine-readable data structure using Track 3 magnetic stripe. This example includes a single iteration of the discretionary data loop in order to include the cardholder’s date of birth. Example:

Card Issuer 9210567898 (example enumerates at group health plan level)
Cardholder ID XJBH3AB572
Cardholder Name JOHN Q PUBLIC
Date of Birth May 17, 1958

<table>
<thead>
<tr>
<th>Start Codes</th>
<th>Data Common to All Cards</th>
<th>Discretionary Loop</th>
</tr>
</thead>
<tbody>
<tr>
<td>% WH 9210567898</td>
<td>XJBH3AB572 PUBLIC/Q</td>
<td>DB 19580517</td>
</tr>
<tr>
<td>Req fixed</td>
<td>Req fixed</td>
<td>Discretionary Req fix</td>
</tr>
<tr>
<td>1 2</td>
<td>10</td>
<td>10 1 13 1 2</td>
</tr>
</tbody>
</table>

Number of characters: 50

1) Number of characters.

Number of characters in example as shown: 50
Number of characters if name were, say, 26 characters: 63
(LRC is only included in magnetic stripe). Space Remaining 82-63 = 19

Other card issuers may require more space for cardholder ID and may not need date of birth but may need other discretionary data. Each issuer should design (1) using this standard data structure and (2) within capacity of the technology.

2) Group number. In the above example, the standard card issuer identifier is the group health plan8 as rather than the payer. In this way, a single card, having only two identifiers, can support multiple benefits even though each benefit may

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8 Note it is also possible to put a proprietary group number in the discretionary data loop.
use different payers and administrators. The information to do this is in a public directory. For example, the directory says, send medical benefit transactions to one administrator but send dental benefit transactions to another. Refer to 5.3.

3) **Error Correction.** If the card uses Track 3 magnetic stripe, a Longitudinal Redundancy Check (LRC) character must be added. Track 3 has capacity for 82 characters including the LRC after end sentinel. A magnetic stripe card reader checks the LRC to ensure accuracy but does not send the LRC along with the data. LRC calculation is specified in ISO/IEC 7811-6. Refer to underlying standard, INCITS 284.

If the card uses PDF417 bar code, LRC is not included because PDF417 inherently includes its own error correction codes.

### 4.6 Legacy Format Codes

1) **Legacy Formats Accommodated.**

Some health card issuers have Track 3 magnetic stripe or PDF417 bar code health identification cards already in circulation, but they use a data structure that is different from the standard described here. Typically these cards use a format code that differs from the “WH” of the standard, and that enables continued use of these cards during transition to the standard over an indefinite time period. In some cases a legacy format lacking a format code may be registered provided that it is possible for a computer to determine the format.

2) **Registering Existing Legacy Formats.**

Refer to Attachment A for how to obtain a programmer’s guide for deciphering, not only the standard format, but registered legacy formats as well. The same source will accept registration of additional existing formats.

### 4.7 Accommodating Future Needs with Qualifier Codes

1) **Format Code Unlikely to Change.**

The Format code is intended to accommodate legacy formats. Conceivably—but only if genuinely necessary—a new standard format could provide needed future changes in the standard\(^9\). But the legacy format provision is not intended to accommodate new nonstandard formats because they are unnecessary and every format code increases programming in provider systems; so such new formats must be strongly discouraged. Therefore, it is possible such a new format code might not be accepted within the legacy provision.

2) **New Qualifier Codes.**

The data structure described here is flexible and able to support any ID card purpose, and new qualifier codes for new data fields may be added as needed. Refer to Attachment A on maintenance of the qualifier code list.

---

\(^9\) Format codes are durable; for example, the bank card format code for Track 1 has not changed in a half century.
5.0 HEALTH INSURANCE OR BENEFIT CARD

5.1 Printed Information on a Health Insurance or Benefit Card

Requirements for printed information. Printed information on a health insurance or benefit card shall conform to the General Design and Essential Information described in 3.0 and to the information required in this section. In addition, an insurance or benefit card may include other situational and discretionary information described in this section.

Recommendations for printed information. The information labeled as recommended in this section reflects provider office procedures, and it results from consensus of provider and plan stakeholders. Automated processing of card information may reduce the need for some of the information described in this section, but it may be important during an indefinite transition.

Example of Health Insurance Card

1) General Recommendations

- A provider should be able to photocopy a card clearly; for example, the color of the card should not copy as a dark background obscuring information.
- Logos and printed material should not obscure printed information elements.
- The card should be as simple as practical by avoiding unnecessary information.
- The card should be durable.
- In general, printed information elements and labels—that is, personalized or variable information with labels—are printed on the front side of the card while instructions, contact information, and other relatively constant data are printed on the back side of the card. Brand information, such as the card issuer logo, is on the front side. However, the card issuer has discretion except where the guide is explicit.
- Refer to 3.6 for placement alternatives for essential information.
### 2) Required, Situational, and Discretionary Printed Information

<table>
<thead>
<tr>
<th>Information Element</th>
<th>Label*</th>
<th>Information Element</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Machine-readable strip</td>
<td>na</td>
<td>Required</td>
<td>§12.0, 13.0</td>
</tr>
<tr>
<td>Card issuer name or logo; additional information at issuer discretion)</td>
<td>As needed</td>
<td>Required</td>
<td>Front Side</td>
</tr>
<tr>
<td>Card issuer identifier; PlanID (c.f. 3.4)</td>
<td>Standard label required; see 5.1(4)</td>
<td>Required</td>
<td>Front Side</td>
</tr>
<tr>
<td>Cardholder identifier, a unique identifier assigned by the card issuer. (c.f. 3.3)</td>
<td>Label required, such as: “Subscriber ID” “Member ID”</td>
<td>Required</td>
<td>Front Side</td>
</tr>
<tr>
<td>Cardholder name. Name must correspond to cardholder identifier. Cardholder is subscriber, member, patient; cardholder may be a dependent (c.f. 3.2 and 5.2(1)).</td>
<td>Label required, such as: “Subscriber” “Member”</td>
<td>Required</td>
<td>Front Side</td>
</tr>
<tr>
<td>Dependent name when card issued to a dependent but dependent is not cardholder. (c.f. 5.2(2))</td>
<td>Label indicating dependent/s is required</td>
<td>Situational, required if card is for dependent who is not cardholder</td>
<td>Front Side</td>
</tr>
<tr>
<td>Employer or Group Health Plan name</td>
<td>As needed</td>
<td>Recommended</td>
<td>Front Side</td>
</tr>
<tr>
<td>Proprietary Policy Number, Group Number, or Account (such as provider billing number). (c.f. 5.3)</td>
<td>Label required if data present</td>
<td>Situational, Required when different not card issuer ID and payer needs it</td>
<td>Front Side</td>
</tr>
<tr>
<td>Type, purpose, and supplemental benefits; for example, HMO, POS, EPO, PPO, and Drug, Vision, Dental.</td>
<td>As needed</td>
<td>Required but may be implicit from plan or network logos</td>
<td>Front Side</td>
</tr>
<tr>
<td>Medicare Part-D Logo, CMS contract number, Pharmacy Benefit Package number</td>
<td>As specified by Medicare Part-D</td>
<td>Situational, Required if Medicare Part-D</td>
<td>Front Side</td>
</tr>
<tr>
<td>Name(s) and address(es) such as claims submission address.</td>
<td>As needed</td>
<td>At Least One Address Required</td>
<td>Recommend Back Side</td>
</tr>
<tr>
<td>Contact telephone number(s) for benefit eligibility inquiry, patient assistance, claim inquiry, pre-cert.</td>
<td>As needed</td>
<td>At Least One Telephone Number Required</td>
<td>Recommend Back Side</td>
</tr>
<tr>
<td>Web site for further information</td>
<td>As needed</td>
<td>Recommended</td>
<td>Either Side</td>
</tr>
<tr>
<td>Primary care physician name</td>
<td>As needed</td>
<td>Recommended when applicable</td>
<td>Either Side</td>
</tr>
<tr>
<td>Primary care physician phone number</td>
<td>As needed</td>
<td>Recommended if PCP included</td>
<td>Either Side</td>
</tr>
<tr>
<td>Administrative Services Only (ASO) or Third party administrator (TPA) name or logo.</td>
<td>As needed</td>
<td>Recommended when applicable</td>
<td>Either Side</td>
</tr>
<tr>
<td>Provider network name or logo</td>
<td>As needed</td>
<td>Recommended when applicable</td>
<td>Front Side</td>
</tr>
</tbody>
</table>
### Information Element | Label* | Information Element | Location
--- | --- | --- | ---
Annual deductible amount | As needed | Discretionary | Front Side
Co-payment actual dollar amounts:  
- PCP & specialist office visits  
- Emergency & urgent care  
- Prescription drug | As needed | Discretionary | Front Side
Co-insurance amount or percentage; explain applicability | As needed | Discretionary | Front Side
Date of birth of cardholder or date of birth of dependent if card issued to dependent | Indication whether cardholder or dependent | Recommended | Front Side
Date card issued | “Card Issued” | Recommended | Front Side
Date card expires | “Card Expires” | Discretionary | Front Side
Date benefits effective | “Benefits Effective” | Discretionary | Front Side
Instructions and contact number for patients with questions. | As needed | Recommended | Back Side
Instructions and contact number for providers with questions. | As needed | Recommended | Back Side
Instructions for hospital admission, prior authorization, pre-certification. | As needed | Recommended | Back Side
Instructions for emergency and urgent care benefits, approval, claim. | As needed | Recommended | Back Side
Instructions for approval of out-of-network benefits and claims | As needed | Recommended | Back Side
Instructions for behavioral health network benefits, approval, claim submission. | As needed | Recommended when applicable | Back Side
Laboratory vendor name or logo and contact information if exclusive | As needed | Recommended when applicable | Back Side
Any other data is permitted | As needed | Discretionary | Either Side

* "As needed" means a label is needed if and as judged appropriate by the card issuer to clarify subscriber and provider understanding.

### 3) Notes on Selected Data Elements

- **Card issuer identifier.** The label must include the “80840” ISO prefix to meet requirements in ISO card standards. See 5.1(4) for standard label.

- **Cardholder.** The Cardholder Name and Cardholder ID must refer to the same person. See 2.0, 3.2, and 3.3. An ASTM International standard patient ID is not used on health insurance or benefit cards.

- **Proprietary Policy or Group Number.** A proprietary (as opposed to ISO standard) Policy, Group, or Account information element includes the group, plan, policy, contract, certificate, or account, depending on the nomenclature used by the benefit plan.
  - **Proprietary Group Number not needed when card issuer identifier is standard group number.** When the card issuer identifier is the
standard identifier for the policy or group health plan, as described in 3.4 and 5.3, then this information element is redundant and excluded.

- **Otherwise**, when the card issuer identifier is not the policy or group but the payer or administrator needs the policy or group for identification or claims process, this information element is required. For example, some payers and administrators still require the group number in order to identify the subscriber, in which case, by not enumerating the group as the ISO standard the card issuer identifier, providers are required to obtain three instead of two identifiers from the health benefit card.  

12 Enumerating the group as the ISO standard card issuer identifier would eliminate the extra required data element, eliminate a consequent source of errors, and enable multiple benefits. Refer to 5.3 below.

4) **Labels**

Certain information elements require labels as described in the table above. Labels are recommended for other information elements when useful for clarity. Labels, including abbreviations when necessary, should use commonly accepted terminology and be readily understandable by users.

**Standard label for card issuer identifier.** The label must include the “80840” ISO prefix as part of requirements in ISO card standards. Use standard label as follows:

<table>
<thead>
<tr>
<th>Type of Card Issuer</th>
<th>Standard Label</th>
</tr>
</thead>
<tbody>
<tr>
<td>Payer</td>
<td>“Health Plan (80840)”</td>
</tr>
<tr>
<td>Group Health Plan</td>
<td>“Group Health Plan (80840)”, or</td>
</tr>
<tr>
<td></td>
<td>“Group Plan (80840)”</td>
</tr>
<tr>
<td>Health Care Provider</td>
<td>“Provider (80840)”</td>
</tr>
<tr>
<td>Other Card Issuer</td>
<td>“Issuer (80840)”</td>
</tr>
</tbody>
</table>

5.2 **Cards with Names of Dependents**

A plan has two options for printing dependent names if needed:

1) **When Dependent is the Cardholder**

   When the dependent is the cardholder—that is, when the cardholder ID and dependent name identify the same person—then the dependent’s name is the cardholder name, and from the provider’s perspective, the card is the same as though the dependent were the subscriber.

2) **When Dependent is Not the Cardholder**

   When the dependent is not the cardholder—that is, when the cardholder ID and dependent name do not identify the same person—then the card must print the name/s of the dependent or dependents separately from the cardholder name. Otherwise,
placement of dependent names is discretionary. The dependent’s person code must be shown if it is required for claims or other transactions; refer to 4.3. For example:

5.3 Multiple Benefits on a Single Health Insurance or Benefit Card

This implementation guide permits only a single set of essential information—one card issuer and one cardholder ID and name—on a single card, although there is a transitional exception for combined medical and drug cards described in 6.0. This limitation means that, in order to enable different transaction destinations for two benefits on a single card, the design requires the destination for each benefit to be in a publicly accessible card issuer directory for use by the systems of providers, clearinghouses, and others. Refer to Attachment A(5).

For example, if an eligibility inquiry or claim is for medical benefits, the directory would direct the transaction to the medical insurer or administrator; if for dental benefits, it would direct it to the dental administrator; if for drug, it would direct it to the pharmacy benefit manager.

To take advantage of this capability, the card issuer may elect to enumerate the card issuer identifier at the group health plan level, or at an intermediate level having sufficient granularity to accommodate all the different combinations of benefit administrators.

This implementation guide also continues to permit multiple cards for multiple benefits.

5.4 Machine-Readable Data on Health Insurance or Benefit Cards

- **Machine-Readable Data** for a health insurance or benefit card is described in 4.0. Especially refer to 4.5 for example.

- **Discretionary Data** described in 4.2 offers the card issuer considerable option; however, in general, this implementation guide recommends that the card should be as simple as practical to meet its objectives. The card is intended as an access key, which requires essential information and such other information specified in 5.1(2).
6.0 COMBINED PRESCRIPTION DRUG AND OTHER BENEFIT CARD

The description of prescription drug benefit cards in this implementation guide is limited to a drug benefit combined with other benefits on the same card. Refer also to implementation guide of the The National Council for Prescription Drug Programs (NCPDP); Attachment A(2).

6.1 Transitional Exception to Single Set of Identifiers

As described in 1.8(7), this implementation guide permits only a single set of essential identifiers on a card. However, to accommodate widespread current practice, this implementation guide allows certain additional identifiers as an exception to enable combination of medical and drug benefits in a single card\(^{13}\) during indefinite transition until drug benefits are accommodated as described for other multi-benefit cards in 5.3.

- The essential medical benefit information is placed as described in 3.6. The reason for this is to ensure standard location of information on combined medical and drug cards.
- Drug benefit identifiers—such as RxBIN, RxPCN, RxGroup, RxID—may be above, below, or right of the medical benefit essential information (3.6) and should be grouped together.
- Pharmacy benefit essential information shall be printed in sequence of, and using the labels of, RxBIN, RxPCN (when needed), RxGrp, and RxID with no other intervening information.
- However, when RxGroup and RxID are identical to the medical benefit group and cardholder identifiers, only RxBIN and RxPCN (when needed) shall be included with pharmacy benefit essential information; and the label for group, policy, or account shall be “Group Plan” or “Group Health Plan” because this label is recognized terminology by pharmacy providers, and it is required in the NCPDP implementation guide adopted by many states.

6.2 Transition Period

With implementation of the standard card issuer identifier and associated directory as described in 3.4 and 5.3, it is possible for a combined medical and drug benefit card fully to conform to the simplicity principle of having only one set of essential identifiers per card. So it is anticipated that the drug card exception will become unnecessary over time, and combined medical and drug benefit cards will be supported as any multi-benefit card. Refer to 5.3.

\(^{13}\) The cause for the exception is that a drug ID card currently identifies the drug benefit manager (using a BIN number) instead of identifying the health plan. Without a standard plan identifier, cardholder IDs from two different group plans can conflict within the same drug benefit manager; so it is necessary for the IDs used in drug plans in many cases to be made different from the corresponding ID for medical plans.
7.0 OPTION TO COMBINE A HEALTH ID CARD WITH A BANK CARD\textsuperscript{14}

This implementation guide permits, but does not require, a health identification card to be combined on the same card with a standard credit card or debit card.

Health cards issued with financial institutions are often consumer multi-purpose cards used to make payments to providers from special accounts such as health savings accounts, flexible spending accounts, commuter cards related to health benefits, and others.

7.1 Design Approach

Bank cards conform to ISO standards accepted worldwide, and in many respects bank card standards are more restrictive than this implementation guide and its underlying standard, INCITS 284. In addition, bank cards have well established business and legal requirements. For these reasons, the approach to combining a bank and health card is as follows:

- **Bank card.** First, start with conformity to bank card standards for printed information and use Tracks 1 and 2 magnetic stripe for machine-readable information.

- **Health card.** Then add health identification card information such that the printed information is printed in space that is discretionary for bank cards and machine-readable information is recorded as described in 4.0, 12.0 for Track 3 magnetic stripe, and 13.0 for PDF 417.

7.2 Printed Information on a Combined Bank and Health Card

After all requirements for bank card printed information are met, health information can be positioned on the card in remaining space. The following is illustrative only.

\textsuperscript{14} This implementation guide uses the term, \textit{bank card}, to include standard credit and debit cards issued by financial institutions. Included are Visa, MasterCard, American Express, Discover, and other standard cards.
• The dimensions and fonts above are shown only to assist understanding. A card issuer should conform to precise bank card standards for bank card information, then conform to this implementation guide and its underlying standard for health identification card information.

• After meeting bank card requirements on the front of the card, most of the remaining space available for health information is located in roughly the upper half. Space and state requirements may be limiting factors. On the back of the card bank card information may be required and remaining space is available for a health card.

• The health card information illustrated above consists of the essential health identification information plus the name of the group, which is discretionary. The standard card issuer number shown in the illustration identifies the group health plan.

• The bank card number and 4-line text\(^{15}\) are usually embossed. Some newer cards for electronic transactions only are not embossed.

• In most cases, the 4-line text on a bank card is not fully used. Some of this space may be usable for health card information. Typical bank card use of the 4 lines includes:
  - Bank cardholder name
  - Bank card issue date and expiration date

7.3 **Recommend that Both Subscriber Name and Bank Account Name be Printed**

The subscriber name of the health card is essential information. It may be the same or different from the bank account name. For consistency and ease of use, this implementation guide recommends that the subscriber name be printed with health information and the bank account name be printed with the bank card information, even if the two names are the same.

7.4 **Machine-Readable Information on a Combined Bank and Health Card**

Encoding of machine-readable information for a combined bank and health ID card is as follows:

• Bank card information is encoded in Tracks 1 and 2 magnetic stripe for bank card information. Refer to bank card standards for data content and format.

• Health ID card information described in 4.0 may be encoded on a combined bank and health ID card in either or both:
  - Track 3 of the magnetic stripe as described in 12.0; and/or
  - PDF417 bar code as described in 13.0.

\(^{15}\) Although the ISO standard describes 4 lines of embossed text below the bank card number, bank cards generally do not emboss the first such line and instead use that space for other information such as non-embossed dates and codes.
8.0 PROVIDER-ISSUED CARD FOR REPEAT ADMISSION OR TREATMENT

A provider may issue a patient a card identifying the patient or the patient’s records. Typical uses of this card include: (1) rapid identification for readmission or repeated treatment, (2) patient record ID to enable consolidation of medical records at the provider or health databank.

8.1 Printed Information

Printed information shall conform to the General Design and Essential Information described in 3.0. Inclusion of other information is discretionary. Examples:

1) Proprietary Patient ID assigned by the hospital or provider.

2) ISO Standard U.S. Healthcare Confidential Patient Identifier. The hospital or other provider may arrange for the patient to be assigned standard, portable, and confidential patient identifier to assist consolidation of patient records across multiple providers and time periods, subject to patient authorization. See also ASTM standard patient identifier.

3) Labels. Essential information elements require labels. Labels are recommended for other information elements when useful for clarity. Labels should use commonly accepted terminology and be readily understandable by users.

Standard label for card issuer identifier. The card issuer label must include the “80840” ISO prefix as part of requirements in ISO card standards.

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<th>Type of Card Issuer</th>
<th>Standard Label</th>
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<td>Health Care Provider</td>
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8.2 Machine-Readable Information.

The card shall carry the required machine-readable information specified in 4.0 and such situational and discretionary machine-readable information specified in 4.0 as the card issuer deems useful for the card’s purposes.
9.0 HEALTH IDENTIFICATION CARD ISSUED BY OTHER ENTITY

Any other entity may issue a health identification card. A typical use of this card would be patient record identification to enable consolidation of medical records.

9.1 Printed Information

Printed information shall conform to the General Design and Essential Information described in 3.0. The card issuer may include such other information as it deems useful for the card’s purposes.

- **Card Issuer Identifier.** The card issuer identifier must be a standard identifier as specified in 3.4. The example is a trading partner standard identifier for the Regional Health Information Organization (RHIO) that issued the card. The card issuer label must include the “80840” ISO prefix as part of requirements in ISO card standards.

<table>
<thead>
<tr>
<th>Type of Card Issuer</th>
<th>Standard Label</th>
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</table>

- **Patient ID.** The above examples illustrate two types of patient ID:
  1) **Proprietary Patient ID** assigned by card issuer.
  2) **ISO Standard U.S. Healthcare Confidential Patient Identifier.** The card issuer may have arranged for the patient to be assigned this portable patient identifier. It may be useful for consolidation of patient records across multiple providers and time periods subject to patient authorization. See also ASTM standard patient identifier.

9.2 Machine-Readable Information.

The card shall carry the required machine-readable information specified in 4.0 and such situational and discretionary machine-readable information specified in 4.0 as the card issuer deems useful for the card’s purposes.
10.0 HEALTH ID CARD TO ASSIGN STANDARD IDENTIFIERS

A health identification card is frequently the most convenient means to convey assignment of a standard health identifier. The following is an example of assignment of an Atypical Provider Identifier (API) to an Atypical Provider.

10.1 Printed Information

Printed information shall conform to the General Design and Essential Information described in 3.0. The card issuer may include such other information as it deems useful for the card’s purposes.

- **Card Issuer Identifier.** The card issuer identifier must be a standard identifier as specified in 3.4. The example above shows a standard card issuer identifier for the health plan that arranged for assignment of the API.

- **Cardholder Identifier.** The above example illustrates assignment of a standard Atypical Provider Identifier (API) to a provider of services who is not a health care provider and is therefore ineligible for a National Provider Identifier (NPI). The API is an ISO standard U.S. healthcare identifier.

10.2 Machine-Readable Information.

The card shall carry the required machine-readable information specified in 4.0 and such situational and discretionary machine-readable information specified in 4.0 as the card issuer deems useful for the card’s purposes.
11.0 PORTRAIT

This Implementation Guide permits, but does not require, inclusion of a portrait in conformance with the underlying standard, INCITS 284. The portrait of the cardholder must be of photographic quality in color or black and white. Refer to INCITS 284 for portrait specifications. An issuer is cautioned that some states may have privacy restrictions on inclusion of a portrait.

Illustration with portrait (not drawn to scale)
12.0 MAGNETIC STRIPE TRACK 3

This implementation guide requires either Track 3 Magnetic Stripe and/or PDF417 bar code.

12.1 Conformance

If Track 3 of Magnetic Stripe is elected, this implementation Guide requires conformance with:

- American National Standard INCITS 284 as revised: Identification Cards—Health Care Identification Cards. Refer to 1.2.

12.2 Track 3 Magnetic Stripe

- This implementation guide specifies data content for Track 3 Magnetic Stripe only. It does not specify content for Tracks 1 and 2. Tracks 1 and 2 may be used for bank card information as described in Section 7.0, or may be used for other purposes. For example, some states currently employ Tracks 1 and 2 for welfare benefit programs including Medicaid, and after using Track 3 for health benefits, they may elect to continue to use Tracks 1 and 2 for the other welfare purposes.

- Encoded data in Track 3 shall be as specified in Section 4.0. Note an LRC error detection character must be included within the character count of 82 maximum. An LRC immediately follows the end sentinel of each Track. A magnetic stripe card reader checks the LRC to ensure accuracy but does not send the LRC along with the data. Refer to 4.1, 4.5. LRC calculation is specified in ISO/IEC 7811-6. Refer to underlying standard, INCITS 284.

12.3 Card Characteristics

- The physical characteristics of the card shall conform to ISO/IEC 7810 (like a charge card) or to ISO/IEC 15457-1, thin flexible card.

- The Magnetic Stripe is located on the upper backside of the card in accordance with ISO standards referenced in INCITS 284.
13.0 **USS PDF417 2-DIMENSIONAL BAR CODE**

This implementation guide requires either Track 3 Magnetic Stripe and/or PDF417 bar code.

13.1 **Conformance**

If PDF417 is elected, this Implementation Guide requires conformance with:

- American National Standard INCITS 284 as revised: *Identification Cards—Health Care Identification Cards*. Refer to 1.2.
- *Uniform Symbology Specification—PDF417* (USS PDF417). This document may be ordered from AIM International at [www.aimglobal.org](http://www.aimglobal.org).

13.2 **PDF 417 Bar Code**

- Encoding data in PDF 417 bar code shall be as specified in Section 4.0. Error correction coding is included within the technology.

13.3 **Card Characteristics**

- This Implementation Guide recommends the physical characteristics of the card to conform to ISO/IEC 7810 (like a charge card) or to ISO/IEC 15457-1, thin flexible card. However, a card using PDF417 bar code may be printed on paper card stock, such that after normal folding, if any, there is a front side and a back side to the card as defined in the standard.
- The PDF417 image shall conform to the specifications in ISO/IEC 15438.
- The PDF417 image may be located anywhere on either front or back side of the card. However, the card issuer is cautioned that the position, size, and shape of the PDF 417 image affects the type of card reader needed by a provider or other user.
14.0 AUTHOR GROUP AND MAJOR STAKEHOLDER PANEL

14.1 Disclaimer

Participation in either the Author group for the implementation guide or the Major Stakeholders Panel does not necessarily imply endorsement of the guide by the individuals or organizations.

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In addition, the authors wish to credit many other individuals who worked to create the underlying standard in 1992-97, especially Tom Keane of Blue Cross Blue Shield of Florida, Joel Ackerman, the members of ASC INCITS B10, and Harvey Rosenfeld of ANSI.
### 14.2 Major Stakeholders Panel

The authors wish to credit the following individuals and organizations who contributed generously of their time and perspective as members of a special ad hoc panel of major stakeholders established to address data content, technology, financial card combination, and usage. Participation on the panel does not constitute endorsement of this guide.

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</tbody>
</table>
Attachment A

Where to Obtain:
INCITS 284 Standard, Implementation Guides,
Legacy Machine-Readable Formats, Code Values,
and Card Issuer Identifiers & Directory

1) American National Standard INCITS 284

To implement the specifications in this paper, a card issuer will need both this Implementation Guide and a copy of the underlying standard, INCITS 284 as revised\(^{16}\), which may be obtained from the American National Standards Institute, Inc. 25 West 43\(^{rd}\) Street, New York, NY 10036, or on-line through [www.ansi.org](http://www.ansi.org).

The underlying standard invokes a number of ISO standards by reference. A card issuer may wish to obtain copies of these from ANSI as well; however, typically, a card issuer may choose to rely on its card supplier to ensure compliance with these technical standards.

2) Other Implementation Guides for the Standard

The National Council for Prescription Drug Programs (NCPDP) publishes an Implementation Guide that applies the underlying standard to Pharmacy ID Cards. A copy may be obtained from NCPDP, 9240 East Raintree Drive, Scottsdale, AZ 85260, or on-line at [www.ncpdp.org](http://www.ncpdp.org).

In 2006, Medicare adopted the NCPDP Implementation Guide for Medicare Part-D drug program, and it worked with the author group of this implementation guide to ensure compatible combination of medical and drug benefit cards.

3) Legacy Machine-Readable Formats

- To obtain specifications for legacy machine-readable data formats, go to [www.nuidc.org](http://www.nuidc.org). NUIDC is the National Uniform Identifiers Committee\(^{17}\).
- To register specifications for existing legacy machine-readable data formats, go to [www.nuidc.org](http://www.nuidc.org).

4) Code Values (Refer to 4.2)

- To obtain the most recent version of the qualifier code list go to [www.nuidc.org](http://www.nuidc.org).
- For instructions on the process for additions to the code list, go to [www.nuidc.org](http://www.nuidc.org).

5) Standard Card Issuer Identifier and e-Directory

- To obtain a standard card issuer identifier (c.f. 3.4), go to [www.nuidc.org](http://www.nuidc.org).
- To access an e-directory for standard card issuer identifiers, go to [www.nuidc.org](http://www.nuidc.org).

\(^{16}\) However, the currently available version is INCITS 284-1997. This implementation guide is premised on a revision that will be approved and publicly available in final form after its expected publication date in 4\(^{th}\) quarter 2007.

\(^{17}\) Draft note: The [www.nuidc.org](http://www.nuidc.org) web site is expected to be operating September 1, 2007.
Attachment B
Algorithm for Card Issuer Identifier Check Digit

Check Digit Formula (Luhn Formula with ‘80840’ Prefix Adjustment)

1. The 10-digit number after the “80840” prefix consists of a root number and a check digit:

   1234 567 89C
   where:  123456789 = root number
          C = check digit, which is the 10th digit
          Spaces or hyphens, if any, are not significant

2. Double the value of alternate digits beginning with the first right-hand (low order) digit of
   the root number.

3. Add all the individual digits of the root. If one of the products obtained in step 2 consists
   of 2 digits, add those digits into the sum. For example, the digit 7 doubled = 14; so add
   1 + 4.

4. Add 24 to the result to account for the “80840” prefix.

5. Subtract the sum from the next higher number ending in 0. This is the same as
   calculating the tens complement of the low order digit of the sum. If the sum ends in
   zero (40, 50, etc.), the check digit is 0.

6. Example. Let the root identifier = 12345 6789C

<table>
<thead>
<tr>
<th>Root Number</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Doublealternate digits</td>
<td>×2</td>
<td>×2</td>
<td>×2</td>
<td>×2</td>
<td>×2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interim</td>
<td>2</td>
<td>2</td>
<td>6</td>
<td>4</td>
<td>10</td>
<td>6</td>
<td>14</td>
<td>8</td>
<td>18</td>
</tr>
<tr>
<td>Sum individual digits</td>
<td>2 + 2 + 6 + 4 + 1 + 0 + 6 + 1 + 4 + 8 + 1 + 8 = 43</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adjustment for prefix</td>
<td>+24</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sum</td>
<td>67</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Check Digit (Mod 10)</td>
<td></td>
<td>Check Digit = 70 − 67 = 3</td>
<td></td>
<td></td>
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7. Alternatively, the calculation may be made on the number when the prefix is included, in
   which case the calculation is simply the Luhn formula and the adjustment in “4” is omitted.
## Attachment C
### List of Acronyms

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<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>ANS</td>
<td>American National Standard, such as INCITS 284. An American National Standard is developed by a standards setting organization accredited by ANSI and then published by ANSI.</td>
</tr>
<tr>
<td>e-Directory</td>
<td>Electronic directory of PlanID, ediID, and API identifiers.</td>
</tr>
<tr>
<td>IEC</td>
<td>IEC, the International Electrotechnical Commission. <a href="http://www.iec.ch">www.iec.ch</a>.</td>
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<tr>
<td>INCITS</td>
<td>InterNational Committee for Information Technology Standards. Technical committee B10 Identification Cards and Related Devices developed the American National Standard for health identification cards, INCITS 284, as revised, which underlies this implementation guide. <a href="http://www.incits.org">www.incits.org</a>.</td>
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<tr>
<td>NCPDP</td>
<td>The National Council for Prescription Drug Programs, Inc. (NCPDP) is a not-for-profit ANSI-Accredited Standards Development Organization consisting of over 1,500 members representing virtually every sector of the pharmacy services industry. NCPDP publishes an implementation guide for drug benefit cards. Section 6.0 of this WEDI implementation guide describes how to combine medical and drug benefits in one card. <a href="http://www.ncpdp.org">www.ncpdp.org</a>.</td>
</tr>
<tr>
<td>NPlanID</td>
<td>National Health Care Plan Identifier. NPlanID is planned as a 10-digit ISO Standard U.S. Healthcare Identifier authorized under ISO 7812 and to be administered by the Centers for Medicare and Medicaid; however, NPlanID is indefinitely delayed.</td>
</tr>
<tr>
<td>NUIDC</td>
<td>National Uniform Identifiers Committee. An advisory committee being formed in 2007 to provide a central site for healthcare identifiers information and to provide guidance from major stakeholders on healthcare identification. <a href="http://www.nuidc.org">www.nuidc.org</a>.</td>
</tr>
<tr>
<td>Part-D</td>
<td>Medicare Part-D program for prescription drug benefits.</td>
</tr>
<tr>
<td>RHIO</td>
<td>Regional Health Information Organization.</td>
</tr>
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<td>ROI</td>
<td>Return on Investment.</td>
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