



June 21, 2007

The Honorable Michael O. Leavitt  
Secretary  
Department of Health and Human Services  
200 Independence Avenue S.W.  
Washington, D.C. 20201

Re: Need for Continued UPIN Enumeration and Access Throughout the NPI Contingency Period

Dear Secretary Leavitt:

The National Committee on Vital and Health Statistics (NCVHS) is responsible for assisting and advising the Department of Health and Human Services (HHS) in adopting the administrative simplification provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). In that role we have continued to monitor the health care industry's progress toward meeting the May 23, 2007, compliance date for implementation of the National Provider Identifier (NPI).

We last reported NPI status to you on February 15, 2007, and at that time concluded that several key impediments remained to meeting the statutory deadline. At that time, we expressed our concern that the industry would be not be able to meet the target date for NPI compliance, and made a number of recommendations in this regard.

On May 1, 2007, the Workgroup for Electronic Data Interchange (WEDI) provided an update via testimony to the NCVHS Standards and Security Subcommittee that while progress has been made, there is a key outstanding issue that remains. This is the plan by CMS to discontinue issuance of UPIN numbers after May 23, 2007, and CMS's plan to discontinue access to the UPIN file by June 30, 2007.

Based on this expert testimony at the Subcommittee hearings and our own public deliberations, we have the following observation: Some health plans currently use the UPIN as a legacy number for claim adjudication and payment. Providers who bill those plans, but who will not migrate to business operation use of their NPIs until sometime after May 23, 2007, will need the ability to acquire UPIN numbers for new service providers.



**Recommendation:**

After hearing testimony, NCVHS is convinced that CMS should maintain “business as usual” by continuing to issue and make available UPIN numbers until the end of the NPI contingency guidance period (May 23, 2008). NCVHS also recommends that CMS make the subscription UPIN database and UPIN online registry capability available through the full contingency period versus the proposed June 30, 2007 cut-off date.

NCVHS will continue to monitor NPI implementation progress and report to you.

Sincerely,

/s/

Simon Cohn, M.D., M.P.H.

Chairman, National Committee on Vital and Health  
Statistics

Cc: HHS Data Council Co-Chairs