



California Association of
Health Plans



April 17, 2020

Jeremy Willard
Director
Division of Surveillance, Compliance and Marketing
Center for Medicare and Medicaid Services (CMS)
7500 Security Blvd.
Baltimore, MD 21244

via electronic mail: Jeremy.Willard@cms.hhs.gov

Re: NPPES as a Resource to Improve Provider Directory Accuracy

Dear Mr. Willard:

The California Association of Health Plans (CAHP) represents 46 public and private health care service plans (plans) that collectively provide coverage to over 28 million Californians. The California Medical Association (CMA) represents 50,000 physicians and medical students throughout the state of California. America's Physician Groups (APG) is the leading national professional association representing accountable physician organizations who share financial responsibility for patient outcomes with payers. APG represents over 300 such organizations across the nation, serving 40 million patients. The Association of California Life and Health Insurance Companies (ACLHIC) is a state trade association representing many of the largest life and health insurers doing business in California.

We urge you to delay the inclusion of the National Plan and Provider Enumeration System (NPPES) data in the annual Medicare Provider Directory Audits. We understand CMS' recommendation for updating this information. However, it will be challenging for the providers and facilities to do this by April 30, 2020. We respectfully ask you to delay the inclusion of NPPES data in the Medicare Advantage Provider Directory audits to May 2021. This delay will ensure that physicians, hospitals, and all other health care providers can appropriately review and update their information in NPPES.

We agree that provider directory accuracy is a key component to ensure that patients can make informed choices when seeking care. We also understand your efforts to audit and verify the data in these provider directories. This effort should be postponed allowing physicians and health

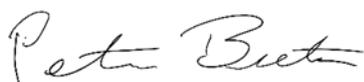
plans to focus their efforts on urgently needed care. Furthermore, we understand the value of NPPES as a resource for all health care, beyond as a validation point for provider directories.

These are unprecedented times and it is important for the health plans and physicians to focus on treating patients affected by COVID-19. Nationwide, the health care delivery system is experiencing many challenges. We acknowledge and thank you for all the efforts CMS has put forth to minimize administrative burden and provide flexibility for regulatory and statutory requirements. Medicare Advantage Organizations (MAOs), physicians, providers and facilities are all focused on addressing the needs of our patients. MAOs work closely with their contracted providers to verify and update provider directory information.

We believe that a delay in this requirement will lead to more accurate, meaningful data in the NPPES database.

We appreciate your consideration of this request.

Sincerely,



Peter N. Bretan, Jr., M.D.
President
California Medical Association



William Barcellona
Executive VP Government Affairs
America's Physician Groups



Christina Wu
Director of Regulatory Affairs
California Association of Health Plans



Steffanie Watkins
Vice President of Health Policy
Association of California Life and Health
Insurance Companies

CC: Stephanie Berry, Regional Director, State Affairs, AHIP