



May 12, 2020

Donald W. Rucker, MD
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Re: ONC Interoperability Standards Advisory

Dear Dr. Rucker:

The National Uniform Claim Committee (NUCC) has reviewed the listing of the Health Care Provider Taxonomy code set ("taxonomy code set") as a standard in Section I: Vocabulary/Code Set/Terminology Standards and Implementation Specifications for Health Care Providers, Family Members, and Other Caregivers. As the maintainer of the taxonomy code set, we appreciate its recognition in the interoperability of health care information, but we have concerns about how it is being characterized in this listing.

The taxonomy code set is listed for use in "Representing Provider Role in Team Care Settings" and the information about it provided in the "Limitations, Dependencies, and Preconditions for Consideration" describes it as capturing the provider role and provider type. This is not the case. The taxonomy code set was not designed to, and therefore does not, identify the provider role or provider type. It identifies the provider grouping, classification, and area of specialization for a provider. This is different from identifying the role a provider is playing in the delivery of patient care. **The NUCC requests that the ONC remove the taxonomy code set as a standard for "Representing Provider Role in Team Care Settings."**

The NUCC also has concerns with the statement made about the taxonomy code set in the Limitations, Dependencies, and Preconditions for Consideration for "Representing Health Care Providers." The second bullet states:

- NPI taxonomy does not describe all roles associated with an individual's care team, however, NUCC Health Care Provider Taxonomy codes cover concepts of other health care providers.

This statement implies that the taxonomy code set describes a provider's role. In addition, it is unclear what is being identified as "NPI taxonomy." The taxonomy code set is used in the NPI application for providers to identify their classification or area of specialization. There is no separate "NPI taxonomy,"

as identified in the above bullet. **The NUCC requests that the above bullet be replaced with the following:**

- **The National Uniform Claim Committee (NUCC) Health Care Provider Taxonomy code set identifies health care provider groupings, classifications, and areas of specialization. It does include other providers than health care providers, which is defined by federal regulations.**

Finally, the “Representing Health Care Providers” applicable value set object identifier (OID) 2.16.840.1.114222.4.11.1066 is incorrect. The HL7 OID registry identifies it as inactive. **The NUCC requests that its OID 2.16.840.1.113883.6.101 be used.**

As a Data Content Committee and named advisor to the Secretary of Health and Human Services (HHS) for the adoption of new and modified standards under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the NUCC appreciates the recognition of our taxonomy code set, which is maintained by our diverse membership of health care providers, health plans, designated standards maintenance organizations, public health organizations, and vendors. If you have any questions, please contact me at (312) 330-2953 or nancy.spector@ama-assn.org

Sincerely,

/s/

Nancy Spector
Chair, National Uniform Claim Committee

Cc: Steven Posnack, Deputy National Coordinator for Health Information Technology, ONC
Stephen Konya, Senior Innovation Strategist, ONC