

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop AR-22-56
Baltimore, Maryland 21244-1850



Audits and Vulnerabilities Group

Date: December 19, 2024

To: All Medicare Advantage (Part C) and Part D Plan Sponsors

From: Jennifer Dupee, Director

Re: Request for Information on Medicare Beneficiary Identifier Lookup Tools

The Centers for Medicare & Medicaid Services (CMS) is seeking input and information from stakeholders on the use of Medicare Beneficiary Identifier (MBI) Lookup Tools related to the following topic areas:

- Organizations that operate an externally-controlled MBI lookup tool
- Users of MBI lookup tools, both CMS-operated and externally-controlled
- Potential benefit or impact of prohibiting or restricting externally-controlled MBI lookup tools
- Safeguards or best practices from inside or outside healthcare that CMS should consider for preventing MBI theft and misuse

Comment Deadline: To be assured consideration, comments must be received by Monday, February 17, 2025.

Comment Submission: Comments should be submitted electronically via the [survey form](#).

For Further Information, Contact: MBILookupToolsRFI@cms.hhs.gov with “RFI” in the subject line

Background

Section 501 of the Medicare Access and Children’s Health Insurance Plan (CHIP) Reauthorization Act of 2015 (MACRA) required CMS to remove Social Security Number (SSN)-based Health Insurance Claim Numbers (HICNs) from Medicare cards, and reissue Medicare cards with a non-SSN-derived identifier. CMS elected to utilize a non-SSN-based “Medicare Beneficiary Identifier,” or MBI, to replace SSN-based HICNs. MBIs are 11-digit randomly generated unique identifiers with no connection to the beneficiary’s SSN. MBIs are confidential and considered Personally Identifiable Information (PII).

The use of MBIs for Medicare billing began in 2018, and CMS discontinued the use of HICNs for Medicare billing in 2020. CMS took several steps to help facilitate the transition from HICNs to MBIs, including the creation of a secure MBI lookup tool that providers and suppliers could use to look up a beneficiary’s MBI if they did not have their Medicare card or know their MBI.

Other external entities, such as state Medicaid agencies, Medicare Advantage (MA) organizations, and private third-party businesses (e.g., clearinghouses), also host similar MBI lookup tools. These external tools may exist solely to find a beneficiary's MBI, or they may be part of a more expansive system that has other functions, such as confirming coverage eligibility or assisting with claim submission. We refer to MBI lookup tools not operated by CMS as "externally-controlled MBI lookup tools."

MBIs have been targeted by individuals seeking to commit Medicare fraud, including the use of MBI lookup tools to commit MBI theft. CMS works to prevent theft and misuse of MBIs through outreach like the "Guard Your Card" campaign and monitoring for reports of compromised MBIs, but fraud continues to occur, much of which is believed to be related to the use of MBI lookup tools. As a part of CMS's efforts to protect beneficiaries, the agency is considering whether additional safeguards are needed to prevent the misuse of MBI lookup tools to illegally obtain MBIs. Such actions could include restricting or prohibiting externally-controlled MBI lookup tools, but CMS would like to better understand the potential effects of taking such actions. To consider the views of all stakeholders, we are soliciting comments to inform future decision-making regarding how we can best protect MBIs and Medicare beneficiaries.

Please fill out the [survey on the CMS website](#) to provide comments.