



Healthcare Business Management Association (HBMA) Response to CMS MBI Lookup Tool Request for Information

February 17, 2025

HBMA is pleased to offer the following general comments in response to the Centers for Medicare and Medicaid Services (CMS) [request for information](#) on Medicare Beneficiary ID (MBI) lookup tools.

About HBMA

HBMA is a national non-profit professional trade association for the healthcare revenue cycle management industry. HBMA is a recognized revenue cycle management (RCM) authority by both the commercial insurance industry and the governmental agencies that regulate or otherwise affect the U.S. healthcare system.

HBMA members have an essential role in the operational and financial aspects of the healthcare system. Our work on behalf of medical practices allows physicians to focus their attention and resources on patient care - where it should be directed - instead of on the many administrative burdens they currently face. The RCM process involves everything from the lifecycle of a claim to credentialing, compliance, coding and managing participation in value-based payment programs.

Preserve CMS MBI Lookup Tool Functionality

RCM companies rely on MBIs for all aspects of the healthcare revenue cycle process. It is the only way for RCM companies to uniquely identify a Medicare beneficiary. MBIs are used to accurately identify patients on claims, determine insurance eligibility, and other essential functions. Patients do not always know their MBI. It is also common for patients to bring the wrong or outdated Medicare card – especially if they are switching between traditional Medicare and Medicare Advantage as patients will not understand the difference. In other cases, patients are afraid to share their MBI with the practice because they were warned about protecting this information for fraud prevention purposes.

The MBI is the only way for practices and RCM companies to access the correct information. It is essential that CMS ensures that RCM companies can access this information through the Medicare MBI Lookup Tool.

RCM companies can use the CMS MBI Lookup Tool or third-party MBI lookup tools to get a patient's MBI. Most RCM companies use the CMS MBI Lookup Tool that is available through their Medicare Administrative Contractor (MAC). CMS's tool is easy to use and provides all of the information we need. The RFI suggests that CMS is considering eliminating third-party look up tools to help prevent fraud. While some companies might prefer to use a third-party lookup tool, those companies would still be able to access the information they need through the CMS tool.

Preventing Fraud

The MBI is rooted in fraud prevention. CMS adopted MBIs to replace the beneficiary's Social Security Number (SSN) as their unique Medicare identifier. The RFI correctly acknowledges that more can be

done to safeguard Medicare beneficiaries from fraud. We are happy to offer our suggestions on how to improve MBI security.

Including the MBI on paper documents mailed to beneficiaries is an avoidable fraud risk. Lost or stolen mail presents a fraud risk where MBIs can easily be exposed. CMS should remove the full MBI from documents mailed to patients such as paper EOBs and claim records. Instead, CMS should only include a partial MBI. While patients can opt in to electronic communications, many choose not to or do not know how to opt in even if they wanted to.

Improving the MBI Lookup Tool

CMS can improve the utility of the MBI Lookup Tool by also listing the member identifier for enrollees in Medicare Advantage plans. The current systems will indicate a patient has Medicare Advantage but provides no other information. Providing the beneficiary's MA identifier number in the MBI Lookup Tool will help reduce administrative burdens by preventing RCM companies and providers from accessing a different system to learn the patient's MA identification number.

The MBI Lookup Tool can also help RCM companies and providers by including information about the specific MA plan the patient has so that claims and correspondence can be accurately directed to the proper health plan. Currently, the plan identifier information is too vague to be useful. MA Organizations (MAOs) typically have an umbrella of multiple plans. It can be difficult for RCM companies to identify the specific plan in that umbrella in which a patient is enrolled. Providing this information through the MBI Lookup Tool will greatly reduce burdens for patients, providers and RCM companies.

Conclusion

Thank you for your consideration of our recommendations. Please contact HBMA Director of Government Affairs Matt Reiter (reiterm@capitolassociates.com) or HBMA Executive Director Brad Lund (brad@hbma.org) if you wish to discuss our recommendations further.