



NHID-Clinical

PAYER & PROCUREMENT REFERENCE

Operational Blueprint

NHID-Clinical v1.3 · From RFP Language to Audit-Ready Production

Version 1.3 · June 2026 · CC BY 4.0

Author: Brianna Baynard · Independent, practitioner-led

NIST Public Comment: NIST-2025-0035-0026

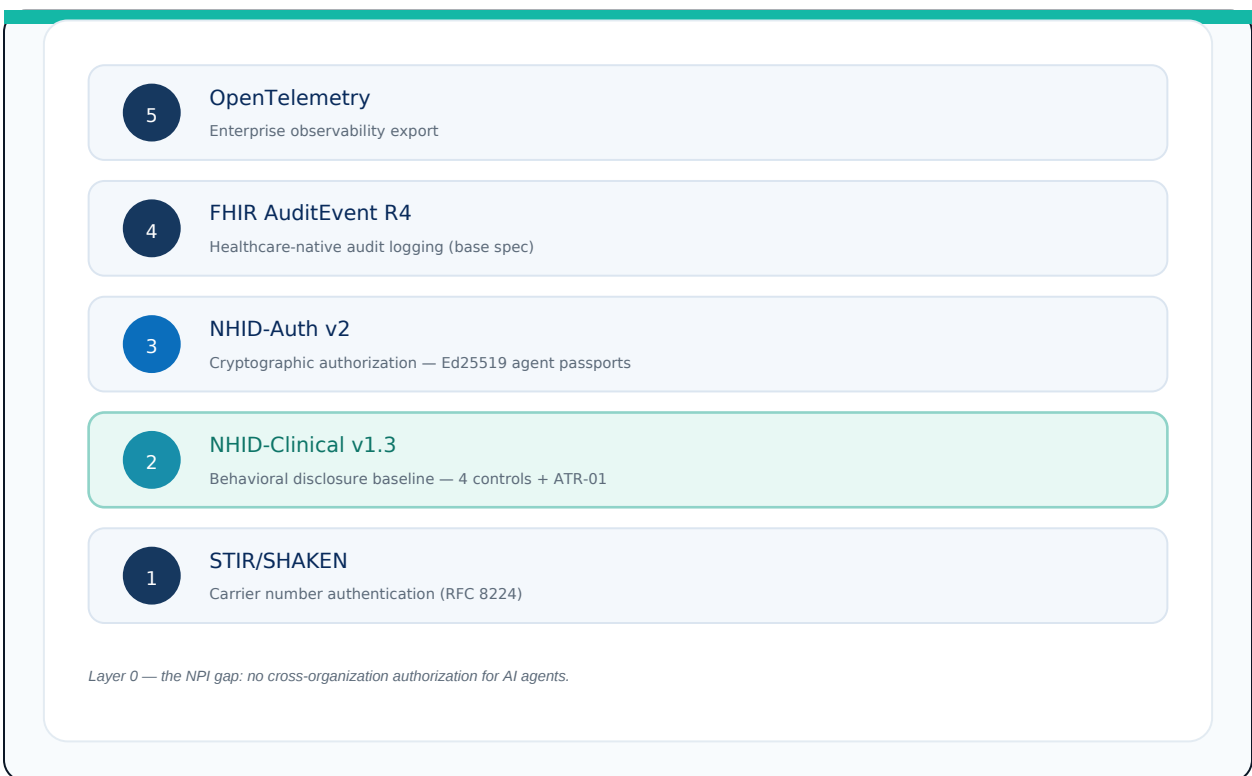
OPEN PROPOSAL — NOT A STANDARD OR REGULATORY REQUIREMENT

NHID-Clinical is an early-stage open proposal by Brianna Baynard. It is a voluntary open proposal — not an accredited standard, not a certification program, and not a regulatory requirement. No HIPAA compliance, security guarantees, or liability protection are implied.

EXECUTIVE SUMMARY

What it is	A payer- and procurement-facing blueprint for turning NHID-Clinical's voluntary transparency controls into RFP language and audit-ready vendor accountability.
How a payer uses it	Add one standard conformance clause to a voice-AI vendor RFP or BAA amendment, have the vendor run the open test suite, validate the JSON traces yourself, then measure and decide.
Operational impact	Machine-auditable proof of how each voice agent handles identity disclosure — no custom contract language, no internal validation tooling, and no production risk.

5 Controls	18 CTS Cases	343 Tests	6 Adapters
----------------------	------------------------	---------------------	----------------------



Five-layer trust stack — network foundation through observability

The Impersonation Latency Problem

When an AI agent calls a payer prior-auth or benefits line, the receiving party often lacks reliable disclosure about whether the caller is human or automated — causing repeated clarifications, transfers, and manual fallback routing.



Impersonation latency — time operating without non-human identity disclosure

Impersonation Latency (canonical term)

Duration an AI agent operates and exchanges PHI without disclosing its non-human identity. NHID-Clinical median observation: 3 turns before first disclosure attempt. This proposal reduces that latency through standardized, auditable behavioral gates.

Five-Layer Trust Stack

NHID-Clinical v1.3 occupies Layer 2 (behavioral baseline). Layers 3–4 add cryptographic identity and healthcare-native audit export.

Layer 0 · NPI Gap

The problem — no cross-org NPI auth

Layer 1 · STIR/SHAKEN

RFC 8224 — carrier number auth (A/B/C attestation)

Layer 2 · NHID-Clinical v1.3

Behavioral baseline — 5 controls, 18 CTS tests

Layer 3 · NHID-Auth v2

Cryptographic agent identity — Ed25519, NPI binding

Layer 4 · FHIR / OpenTelemetry

Healthcare-native audit + SIEM export

Implementation Phases

A 12-week path from RFP language to measurable vendor accountability — no production risk.

Month 1 Behavioral Baseline	Month 2 Gap Analysis	Month 3 Written Assessment
--	-----------------------------------	---

Log · Identify · Record

Evaluate · Quantify

Compile · Share

Phase 1 · Weeks 1–2 — Add RFP Language
 Insert the standard NHID-Clinical conformance clause into your next voice AI vendor RFP or BAA amendment. One clause covers all four controls.

Phase 2 · Weeks 3–6 — Vendor Sandbox Testing
 Ask your vendor to run: `git clone + pip install -r requirements.txt + python -m pytest tests/ -v`. Results in under 5 minutes. Request full terminal output.

Phase 3 · Weeks 7–10 — Validate Logs Yourself
 Place vendor JSON traces in `traces/`. Run the test suite. Verify: disclosure before NPI, no deceptive artifacts, escalation $\leq 2s$.

Phase 4 · Weeks 11–12 — Measure & Decide
 Compare verification latency (target $<5s$) and escalation volume. Use findings to update vendor contract requirements.

Standard RFP / BAA Clause

Copy-ready language for procurement. Voluntary transparency preference — not a certification hurdle.

"The vendor's AI agent SHALL produce NHID-Clinical v1.3 JSON trace logs for all B2B administrative calls, including disclosure timestamps and opt-out handling. The payer may run the open-source conformance test suite against vendor output at any time."

Target Metrics

Metric	Today (typical)	Target with NHID-Clinical
Verification latency	3–5 min or call terminated	< 5 seconds
Audit effort per vendor	Manual call review (hours)	~2 minutes (test suite)
RFP disclosure language	Custom per vendor	One standard clause
Escalation response time	Untracked	≤ 2 seconds, logged

Regulatory Alignment

Illustrative mapping — not a claim of regulatory compliance or certification.

Regulatory Driver	Specific Requirement	NHID-Clinical Control
CMS-0057-F	FHIR API, 72hr turnaround, 5yr log	FHIR AuditEvent + ATR-01
MACPAC May 2026	AI transparency, human review	EIT-01 + ATR-01
DOJ FCA 2026	Explainability + audit trail	LOG + CTS evidence
State AI Laws	Inspectable, auditable decisions	IDG-01 + DBC-01
NIST AI RMF / CAISI	Cross-org agent identity	NHID-Auth v2