



**Compliance***Connection*

*November 3rd, 2014*



**\*\*E-ALERT\*\***

## **CMS ANNOUNCES ENFORCEMENT DELAY OF HEALTH PLAN IDENTIFICATION NUMBERS**

From: Smith & Downey  
Date: November 3, 2014  
Re: Health Plan Identification Number Filing Deadline Delayed

As we reported on October 27, under rules related to the HIPAA electronic transaction regulations, employer-sponsored health plans, whether insured or self-funded, are required to acquire from the CMS so-called "Health Plan Identification Numbers" (or "HPIDs"). For insured plans, the insurance carrier must obtain the HPID. For self-funded plans, the plan sponsor must obtain the HPID.

In a Halloween trick-or-treat surprise, the regulators announced on Friday that the HPID requirement will be delayed indefinitely. Of course, this was after most plans with \$5,000,000 or more in annual claims had already acquired their HPIDs, in order to meet the previously applicable November 5, 2014 deadline for those plans.

(Before Friday's indefinite delay announcement, smaller plans were required to acquire their HPIDs by November 5, 2015.)

(Coincidentally, we noticed that the HPID website was down on Friday, perhaps leading the cynical to speculate that the HPID filing requirement was delayed indefinitely because of a government website failure?)

The regulators' cryptic explanation for this eleventh hour indefinite delay was as follows: "On September 23, 2014, the National Committee on Vital and Health Statistics (NCVHS), an advisory body to HHS, recommended that HHS rectify in rulemaking that all covered entities (health plans, healthcare providers and clearinghouses, and their business associates) not use the HPID in the HIPAA transactions. This [indefinite delay] will allow HHS to review the NCVHS's recommendation and consider any appropriate next steps."

For more information please visit the [\*\*Centers for Medicare & Medicaid website!\*\*](#)

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