



November 3, 2014

HPID Enforcement Delayed

According to the [CMS' HPID website](#), the Centers for Medicare & Medicaid Services (CMS) is delaying, until further notice, enforcement of the health plan identifier (HPID) regulatory requirements, including the requirement that large health plans (including self-insured health plans) obtain an HPID by November 5, 2014.

CMS is responsible for enforcement of compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) standard transactions, code sets, unique identifiers and operating pertaining to health plan enumeration and use of a HPID in HIPAA transactions. This October 31, 2014 enforcement delay applies to the November 5 HPID registration deadline and applies to all HIPAA covered entities, including healthcare providers, health plans, and healthcare clearinghouses.

According to the announcement, a [September 23, 2014 report](#) from the National Committee on Vital and Health Statistics (NCVHS) recommended that covered entities not use the HPID in the HIPAA transactions. The report references a consistent message heard across the industry regarding the "lack of benefit and value in the use and reporting of HPIDs in healthcare transactions" and, therefore, it "should not replace the payer ID currently used by the healthcare industry."

This enforcement delay will allow for review of the NCVHS's recommendation and consideration of any appropriate next steps. In the meantime, until further notice, health plans are not required to obtain a HPID. For questions about HPIDs, contact the CMS through the HPID Mailbox at HPIDquestions@noblis.org.

Should you have questions about this or any aspect of healthcare reform, contact your Conner Strong & Buckelew account representative toll free at 1-877-861-3220. For a complete list of Legislative Updates issued by Conner Strong & Buckelew, visit our online [Resource Center](#).

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