

## HPID Requirements Delayed

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The ACA and HIPAA require that self-funded health plans obtain a 10-digit health plan identifier (“HPID”) by November 5, 2014 for large health plans (more than \$5 million in annual claim receipts) or November 5, 2015 for small plans (\$5 million or less in annual claim receipts), to be used in certain transactions. A carrier will obtain an HPID on behalf of insured health plans.

Effective October 31, 2014, CMS announced an indefinite delay, until further notice, in enforcement of the HPID requirement. This delay was as a result of an advisory board’s recent recommendation that HHS clarify usage of the HPID in certain transactions and the process by which covered entities will certify their use of the HPID to federal regulators.

### ■ Now What?

Employers who have already obtained an HPID do not need to take any action as a result of this indefinite delay. Employers that are in the process of obtaining the HPID or have not yet begun the application should wait until further guidance is issued before completing or beginning their applications, as appropriate.

We are actively monitoring these regulatory developments and will provide you with additional information as it becomes available.