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Health Plan Identifier (HPID) Enforcement Delay

On Friday, October 31, the Centers for Medicare & Medicaid Services (CMS) announced a delay of the regulations pertaining to health plan enumeration and use of the Health Plan Identifier (HPID) in the Health Insurance Portability and Accountability Act of 1996 (HIPAA) standard transactions. The enforcement delay applies to all HIPAA covered entities, including healthcare providers, health plans, and healthcare clearinghouses. ***This means that employers and other plan sponsors of self-funded health plans do not need to obtain an HPID until further guidance is released.***

The full [CMS announcement](#) states that the upcoming HPID deadlines have been delayed “until further notice” with the intent to provide the Department of Health & Human Services (HHS) the opportunity to review a recent [recommendation](#) by the National Committee on Vital and Health Statistics (NCVHS). This advisory body to HHS has recommended that the existing HIPAA transaction regulations be reviewed and for HHS to consider the potential elimination of the HPID requirement.

Plan sponsors of large group health plans that have already obtained their HPID prior to the original November 5 deadline, should retain the documentation in their records. If a plan sponsor has not yet completed their HPID application through the CMS Enterprise Portal no further steps are required at this time.

If you have any questions or need further details about how this delay will affect your employee benefit programs please contact your Trion account team.

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