



# eBenefits Alert: Enforcement Delay Announced for HPID Nov. 5 Deadline

November 3, 2014

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On Oct. 31, 2014, the Office of e-Health Standards and Services, which is charged with HIPAA compliance, announced an enforcement delay to the regulations requiring the use of the Health Plan Identifiers (HPIDs) in HIPAA transitions. The HPID system is designed to create a standard identifier for various transactions required under HIPAA and the Affordable Care Act. Prior to this announcement, the regulations required covered entities to register their organizations and apply for a HPID by Nov. 5, 2014.

This enforcement delay "applies to all HIPAA covered entities, including healthcare providers, health plans, and healthcare clearinghouses." The delay will allow the Department of Health and Human Services to review the National Committee on Vital and Health Statistics' recommendations that covered entities not use the HPID in HIPAA transitions.

In a letter dated Sept. 23, 2014, the National Committee on Vital and Health Statistics recommended to the Secretary of Health and Human Services that HPIDs not be used and questioned the benefit and value of HPIDs. Those recommendations were based on the "[l]ack of clear business need and purpose for using HPID," confusion over how the HPID would be used, and the potential costs associated with using HPIDs.

If you have questions about this delay or how it may impact you, please contact a member of the Gray Plant Mooty Employee Benefits and Executive Compensation practice group.