



## Health Care Reform Update



### IMPORTANT NOTICE REGARDING HEALTHCARE REFORM Update #38

November, 2014

#### Enforcement Delay for Health Plan Identifiers, (HPID)

On October 31, 2014, nearly on the eve of the otherwise applicable compliance deadline, CMS issued a Statement of Enforcement Discretion, delaying enforcement of the HPID rules until further notice. The delay allows HHS to review and consider any appropriate next steps in response to a recent recommendation from the National Committee on Vital and Health Statistics (NCVHS) that HPIDs not be used in HIPAA transactions. NCVHS is an advisory body whose input HHS is statutorily required to consider in establishing HPID rules.

**The regulatory obligations of plan administrators delayed by this notice are the: (i) obtaining of a HPID, and (ii) the use of the HPID in HIPAA transactions.**

To view the CMS Statement of Discretion, click on the link below.

[Statement of Enforcement Discretion](#)

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