

Publications

Labor and Employment Alert: HPID Deadline Delayed at the 11th Hour

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The Centers for Medicare and Medicaid Services (CMS) had set November 5, 2014 as the deadline for all but the smallest self-insured health plans to obtain a health plan identification number (HPID). On October 31, 2014 – less than a week before that deadline (and three days after publishing new FAQs on the process) – CMS **announced** an indefinite delay in the requirement that health plans get HPIDs. So:

- If you have not yet applied for an HPID for your health plan, cross that task off your list.
- If you already have an HPID for your health plan, file that number away. You may or may not need it at some future date.

A last minute delay like this might cause you to question other government deadlines. However, we do not expect CMS to delay the November 15, 2014 deadline to register to pay the reinsurance fee (which, unlike the HPID application process, involves payments to the government). If you would like further information or have questions, please contact your Vorys attorney.