

## **ACT NOW TO OBTAIN A CONTROLLING HEALTH PLAN HPID**

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In light of the numerous unresolved issues surrounding the process for plan sponsors to obtain a health plan identifier (“HPID”) for their self-funded health plan, we suggested in an [earlier post](#) that plan sponsors consider delaying the application process in the hope that regulators would address at least some of the unanswered questions. Since that time, the Centers for Medicare and Medicaid Services (“CMS”) has updated its Health Plan and Other Entity Enumeration System User Manual and issued a set of Frequently Asked Questions. As the deadline for obtaining an HPID approaches, the time for waiting is over.

HPIDs are obtained through the Health Plan and Other Entity Enumeration System (“HPOES”) portal, which is a component of the CMS Health Insurance Oversight System (“HIOS”). However, plan sponsors must first obtain access to the CMS Enterprise Portal before they can register in HIOS and HPOES. Thus, the application process for an HPID is a multi-step process and that may take several days since identification verification and a manual review of submitted information must be conducted at each step.

The deadline for a controlling health plan to obtain an HPID is November 5, 2014. However, small health plans may have an additional year to comply. Given that (i) the regulators have clarified many of the open issues regarding the HDIP application; (ii) the application entails multiple steps that may require several days to complete; and (iii) no extension of the compliance deadline appears to be forthcoming, we highly recommend that plan sponsors start the HDIP application process now rather than waiting until the due date.

## MEET THE TEAM



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