HPID Enforcement Delayed Until Further Notice



Another year, another Halloween Surprise.

We here at Benefit Tax Link value your time, so we try not to email you too frequently. We do have to balance that with the constant barrage of changes coming out of Washington, and so while we'd rather not email you back to back, it's important that you find out about this before your clients start calling.

What happened? CMS officially delayed the enforcement of the HPID requirement for all plans subject to the rule.

What does this mean? If your Controlling Health Plans had already obtained an HPID, they are in compliance and need not do anything. If a Controlling Health Plan has not obtained an HPID, they will not face penalties unless and until CMS makes a further announcement.

Integrated HRAs (which only pay out of pocket expenses under the Controlling Health Plan) and FSAs were already exempted from the HPID requirement under CMS guidance that can be <u>found here</u>.

As always, feel free to call Chris or Carl to discuss any questions you may have.

The full text of the CMS Notice can be found here

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Headquartered in Wayne, New Jersey, Benefit Tax Link provides solutions to brokers and their clients in the form of personal service and assured compliance with complicated regulations surrounding benefits administration, particularly in the realm of tax favored benefits.

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