

ALERT!!!!



About
Bushnell & Company

We are NOT insurance agents or brokers! Since we are a professional fee based consulting firm, our income is transparent and is not tied to high or undisclosed commissions, incentives, trips, etc. from the sale of insurance products.

As the architects of employee benefit plans, we specialize in consulting with leaders and managers of organizations regarding the design, administration, funding and communication of high quality, cost effective and administratively efficient employee benefit plans.

These include, but are not limited to, the following:

- * Medical
- * Dental
- * Disability - Short & Long
- * Life Insurance
- * Long Term Care
- * Retirement
Plans including Defined Benefit Pension, Money Purchase, Profit Sharing, ESOP, 401(k), 403(b), & 457
- * Flexible Benefits or Sec. 125 Cafeteria Plans
- * Transit & Parking
- * Executive Deferred Compensation
- * Retiree Benefits - Medical, Dental, Rx, Medicare coordination of Benefits

We are the company that insurance agents do not want you, or your colleagues, to know about!

10/31/14

CMS Suspends HPID Requirements

The Center for Medicare & Medicaid Services (CMS) has just announced that it is suspending enforcement of the HIPAA Health Plan ID number (HPID) requirements, effective immediately, until further notice. This is not a Halloween Trick or Treat joke, however, we are certain that it will be greeted with euphoria for those who have been trying to get an HPID before the November 5, 2014 deadline. The website portal has been less than desirable to work with and there is an 89 page User Manual of instructions for a 1 page form. The following statement is on the CMS website at <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/Affordable-Care-Act/Health-Plan-Identifier.html>:

Statement of Enforcement Discretion regarding 45 CFR 162 Subpart E - Standard Unique Health Identifier for

Health Plans

Effective October 31, 2014, the Centers for Medicare & Medicaid Services (CMS) Office of e-Health Standards and Services (OESS), the division of the Department of Health & Human Services (HHS) that is responsible for enforcement of compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) standard transactions, code sets, unique identifiers and operating rules, **announces a delay, until further notice**, in enforcement of 45 CFR 162, Subpart E, the regulations pertaining to health plan enumeration and use of the Health Plan Identifier (HPID) in HIPAA transactions adopted in the HPID final rule (CMS-0040-F).

This enforcement delay applies to all HIPAA covered entities, including healthcare providers, health plans, and healthcare clearinghouses. On September 23, 2014, the National Committee on Vital and Health Statistics (NCVHS), an advisory body to HHS, recommended that HHS rectify in rule making that all covered entities (health plans, healthcare providers and clearinghouses, and their business associates) not use the HPID in the HIPAA transactions (see <http://ncvhs.us/wp-content/uploads/2014/10/140923lt5.pdf>).

This enforcement discretion will allow HHS to review the NCVHS's

We pride ourselves in providing professional services with a value in excess of our fees . . . often by a very wide margin.

Those services include, but are not limited to, the following:

- \$ Independent 2nd opinion review and advisory services
- \$ Review and analysis of insurance company contracts and proposals.
- \$ Prepare RFI / RFP / RFP specifications and do analysis for vendor selection.
- \$ Manage annual insurance / vendor renewal process.
- \$ Financing vehicle analysis, including appropriateness of managed care, HMO, HRA, FSA, HSA in insured plan, self-funding and self - insurance.
- \$ Actuarial and administrative consulting services for retirement as well as health and welfare benefit plans.
- \$ Online enrollment and administration.
- \$ Communication of employee benefit plans.
- \$ Comprehensive / total reward benefit statements.
- \$ Focus group studies
- \$ ERISA / COBRA / HIPAA compliance audits
- \$ Expert witness consultation

recommendation and consider any appropriate next steps.



If you have any questions regarding this announcement, or other announcements, regulations, etc. that are likely to be made as the Affordable Care Act aka ObamaCare is implemented, please contact us.

Our clients have discovered the right answers pay for themselves!©

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