



Prep Steps You Can Take

Administrative Simplification Compliance Review Program

March 2019

The Centers for Medicare & Medicaid Services (CMS) Division of National Standards, on behalf of the Department of Health and Human Services (HHS), is launching the Compliance Review Program to ensure compliance among covered entities with HIPAA [Administrative Simplification rules](#) for electronic health care transactions.

Summary

The Compliance Review Program will conduct periodic reviews with randomly selected entities to assess compliance. In March 2019, HHS will randomly select 9 [HIPAA-covered entities](#)—a mix of health plans and clearinghouses—for Compliance Reviews. Any health plan or clearinghouse—not just those who work with Medicare or Medicaid—may be selected. In 2019, providers will be able to participate in a pilot program on a voluntary basis.

Background

[HHS](#) is employing a two-pronged approach to [enforcing rules](#) that streamline electronic administrative [transactions](#):

- 1) **Reactive enforcement**, where we continue our long-standing practice of investigating [complaints](#) against [covered entities](#)
- 2) **Proactive enforcement**, where we randomly select health plans and clearinghouses for Compliance Reviews

Are you ready? Here are steps [health plans](#) and [clearinghouses](#) can take.

Health Plans

*For transactions that **clearinghouses** conduct on your behalf:*

- Ask your clearinghouses to verify that they're handling your transactions in a compliant way.
- You can [test the compliance of your clearinghouse's transactions](#).
- Be sure your contracts with clearinghouses and other third parties require compliance with HIPAA [Administrative Simplification](#) rules for electronic [transactions](#).



For transactions you conduct yourself:

- You can [test the compliance](#) of your transactions.
- You can verify compliance with [operating rules](#) for eligibility, claims status, and electronic funds transfer/remittance advice.

- If your transactions don't comply:
 - You may need to make changes to your administrative workflow to be sure, for example, that you respond in real time to inquiries about:
 - Eligibility
 - Claims status
 - Electronic funds transfer/remittance advice
 - Your software vendor or IT staff may need to debug or update your system.
 - In some cases you may be able to use a compliant clearinghouse to conduct transactions on your behalf.

Clearinghouses

- You can [test your transactions](#) for compliance.
- You can verify compliance with [operating rules](#) for eligibility, claims status, and electronic funds transfer/remittance advice.
- If your transactions don't comply:
 - You may need to make changes to your administrative workflow to be sure, for example, that:
 - You're capturing all the data you need from client documentation
 - You respond in real time to inquiries about:
 - Eligibility
 - Claims status
 - Electronic funds transfer/remittance advice
 - Your software vendor or IT staff may need to debug or update your system.

For More Information

To find out more:

- Visit our website at go.cms.gov/adminsimp, including the Compliance Review page
- View our animated video short about Compliance Reviews
- [Sign up](#) for Administrative Simplification Email Updates

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