CMS Process for HIPAA Administrative Simplification Compliance

CMS, on behalf of HHS, enforces HIPAA Administrative Simplification requirements. CMS enforcement activities include proactive enforcement through Compliance Reviews.

Here's what happens when a HIPAA-covered entity is randomly selected for a review:

**SELECTION AND CONTACT PHASE**

1. CMS contacts randomly selected entity

**SUBMISSION PHASE**

2. Entity identifies points of contact responsible for the Compliance Review
   - CMS provides instructions and resources for submission of required artifacts
   - Entity submits transaction files and other requested artifacts within 30 days of receiving instructions

**REVIEW PHASE**

3. CMS reviews documentation artifacts within 30 days of receipt

**CORRECTIVE PHASE**

4. CMS provides findings to entity:
   - CMS determines corrective action is necessary
   - CMS determines corrective action is not necessary (proceed to phase 5)
   - Entity executes corrective action

**VALIDATION PHASE**

5. CMS confirms corrective action is complete
   - CMS notifies entity and closes review