

Review your good faith efforts to comply

In the days remaining before the October 16th deadline, CMS encourages providers to intensify their efforts toward achieving transaction and code set compliance. Successful contingency planning is an important part of this process and will require the attention and cooperation of all health plans, clearinghouses and of all providers that conduct electronic transactions.

As you develop your contingency plans, ask yourself the following:

- Do you understand CMS's "good faith efforts" guidance on its enforcement approach?
- Have you made reasonable and diligent efforts to become HIPAA compliant?
- Can you provide CMS with documentation of your good faith efforts if a complaint is filed in response to your contingency plan?

CMS is here to help as well. Successful implementation will require the attention and cooperation of the entire health care community. There is considerable industry support for HIPAA transactions and code sets. Your successful contingency plans will greatly enhance communication throughout the industry as it moves towards HIPAA compliance.