

HHS Finalizes First-Ever HIPAA Standards for Health Care Claims Attachments Transactions and Electronic Signatures

EBIA Weekly (April 2, 2026)

Final Rule: Administrative Simplification; Adoption of Standards for Health Care Claims Attachments Transactions and Electronic Signatures, 45 CFR Parts 160 and 162, 91 Fed. Reg. 14350 (Mar. 24, 2026)

[Final Rule](#)

[CMS Fact Sheet](#)

HHS has finalized the first HIPAA-adopted standards for electronic health care claims attachments and electronic signatures used with those transactions. The final rule is intended to replace manual processes—such as faxing, mailing, and uploading items to portals—with standardized electronic exchanges of claims-related supporting documentation, including medical records, x-rays and imaging, and telehealth documentation. The rule implements long-standing HIPAA administrative simplification requirements, as supplemented by the Affordable Care Act, that direct HHS to adopt standards for health care claims attachments. HHS notes that providers and health plans have historically relied on inefficient, nonstandard methods to exchange the additional documentation often needed for claims adjudication; the new standards are intended to improve consistency, reduce administrative burden, and streamline claims processing.

For health care claims attachments, the rule adopts the X12N 277 transaction standards for requests for additional information and the X12N 275 transaction standards for the transmission of information supporting a health care claim or encounter. It also adopts related HL7 implementation guides governing the clinical content included in attachment transactions, along with a standard for electronic signatures used in those transactions. Although the proposed rule addressed both claims attachments and prior authorization attachments, HHS is finalizing standards only for health care claims attachments at this time and indicates that it will continue to evaluate standards for prior authorization attachments separately. The rule is effective May 26, 2026, with a compliance date of May 26, 2028. HHS projects substantial annual savings from reduced reliance on paper-based and other manual processes and notes that the governing statute does not provide an extended compliance period for small health plans.

EBIA Comment: While the most immediate operational impact of this rule will likely fall on providers, payers, clearinghouses, and technology vendors, it also has important implications for employer sponsored group health plans. Group health plans are HIPAA covered entities for administrative simplification purposes, and plan sponsors should not assume that compliance is solely a vendor responsibility. Plan sponsors should begin working now with insurers, TPAs, and other business partners to assess whether systems, workflows, and service agreements will support the new electronic claims attachment standards by the 2028 compliance deadline. To the extent plans or their vendors require signatures in connection with claims attachment transactions, those processes will need to satisfy the newly adopted electronic signature standard. Plan sponsors may wish to review

administrative services agreements, vendor contracts, and business associate agreements to confirm that implementation responsibilities are clearly allocated and that timelines for compliance are realistic. For more information, see EBIA's HIPAA Portability, Privacy & Security manual at Section XXXII.D ("What Transactions and Transmissions Are Covered?").

Contributing Editors: EBIA Staff.