

## National Provider Identifiers-Don't be fooled by the Contingency Plan!

The recently announced NPI contingency plan allows covered entities to escape penalties for non compliance if they demonstrate good faith efforts in becoming ready to use the NPI. CMS is quite clear that this does not absolve a physician who is a covered entity under HIPAA from obtaining their NPI by May 23, 2007!

Indeed, it is ultimately up to individual health plans whether or not to require the NPI both on an electronic claim or a paper claim. Health plans can elect to require NPIs as of the original compliance date of May 23, 2007 or they can declare a contingency plan and delay implementation. In no case will implementation be allowed beyond May 23, 2008. However, unless you check each health plan's companion guide (usually posted on the health plan's website) you may not know if the plan begins implementation as some point between May 23<sup>rd</sup> of this year and 2008!

In fact, Medicare fee for service recently announced its contingency plan. In their contingency plan they state:

"In May 2007, Medicare FFS (fee for service) will evaluate the number of submitted claims containing an NPI. If the analysis shows a sufficient number of submitted claims contain a NPI, Medicare will begin to reject claims on July 1, 2007, that do not contain NPIs."

The contingency plan goes on to state if a sufficient number of claims in the May analysis do not contain NPIs they will re-evaluate in June and determine if they will begin to reject claims without NPIs in August 2007.

Thus your claims could be rejected if they are not NPI compliant as early as July 1 by Medicare!

### What you can do to protect your cash flow

All physicians and providers who need a NPI should obviously obtain theirs as soon as possible; physicians who need a referring or ordering provider's NPI should obtain those as well and load them into their practice management software. Of course it is essential that you obtain, in writing, your practice management vendor and claims clearinghouse's verification that their software is ready and fully tested.

Another overlooked task is communication with health plans. Ultimately it is up to physicians to ensure that the health plans they submit claims to have your correct NPIs for both individuals and for the organization and its subparts.

It is equally important to ensure the health plan will cross walk the NPIs to their internal "legacy" provider numbers and especially your taxpayer identification

number. Doing this is essential to ensure that you are paid at the correct address, from the correct contracted fee schedule and so forth. Some health plans have websites where you can securely log in and update your NPIs; in other cases you may want to send your information by certified mail including your existing legacy numbers.

Do you plan on participating in the Medicare Physician Quality Reporting Initiative?

The PQRI starts with dates of service July 1, 2007 and later. Medicare will require the NPI on all claims submitted with PQRI data. Don't miss out on this excellent bonus opportunity! We will have information on how to submit and bill for PQRI in future releases.

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