

Department of Public Welfare (DPW)
National Provider Identifier (NPI) Initiative

Contingency Plan

Guidance from CMS

CMS Press Release:

[CMS Clarifies Guidelines for National Provider Identifier \(NPI\) Deadline Implementation](#)

CMS Announcement:

[Guidance on Compliance with the HIPAA National Provider Identifier \(NPI\) Rule](#)

Key Notes:

- The contingency plan allows covered entities that have been making a good faith effort, to continue accepting legacy numbers without penalties or other consequences until May 23, 2008.
- The enforcement process is complaint driven.
- Each entity defines the specifics of its contingency plan, which may not extend beyond May 23, 2008.
- The contingency plan is not a requirement and entities may elect to end their plans sooner than May 23, 2008.
- Medicare will be announcing its contingency plan in the near future.

CMS New NPI FAQs:

FAQ 8321: CMS stated that if providers have not yet obtained their NPI, they should do so immediately. Failure to obtain an NPI may be viewed as a violation of the good faith provisions of the CMS contingency guidance.

Claims other than Pharmacy

- **Business As Usual:** May 23, 2007 – May 31, 2007 (1 week)
 - Providers will have the ability to submit Legacy Only, or Both (Legacy & NPI)
 - If Provider Submits:
 - Legacy Only – Claim will pay
 - NPI Only – Suspend claims from May 23-31, recycle them on June 1st when Legacy Dual Strategy starts. June 1st the claim will pay if NPI is registered and validated with DPW
 - Legacy & NPI – Claim will pay using legacy number
- **Legacy Dual Strategy:** June 1, 2007 – May 22, 2008
 - Providers will have the ability to submit NPI only, Legacy Only, or Both (Legacy & NPI)
 - If Provider Submits:
 - Legacy Only – Claim will pay
 - NPI Only – Claim will pay if NPI is registered and validated with DPW and can be crosswalked to valid legacy number for processing. **Providers are encouraged to consider this option only after they have successfully tested their NPI number using the Legacy and NPI option described below.**
 - Legacy & NPI – The submitted legacy number will be used to process the claim. The NPI will be crosswalked to the legacy number on which the provider registered that NPI. If the crosswalked legacy number does not match the legacy submitted on the claim, the submitted legacy number will be used for processing and the provider will be informed that the numbers did not match or could not be crosswalked.

Claims other than Pharmacy

NPI Only: Beginning May 23, 2008

- Healthcare Providers who conduct HIPAA covered electronic transactions will be required to submit NPI only
- If Provider Submits:
 - Legacy Only – Claim will deny
 - NPI Only – Claim will pay if NPI is registered and validated with DPW and can be crosswalked to a legacy number. Otherwise the claim will deny.
 - Legacy & NPI – Claim will pay if NPI is registered and validated with DPW. Legacy numbers will no longer be permitted in primary fields and will not be used for processing.

Pharmacy (NCPDP) Claims

- **Business As Usual:** May 23, 2007 – May 31, 2007 (1 week)
 - Continue to accept and process using **legacy number ONLY**
 - If Provider Submits:
 - Legacy Only – Claim will pay
 - NPI Only – Claim will deny
- **Legacy or NPI or Both:** June 1, 2007 – May 22, 2008
 - Providers will have the ability to submit NPI only, Legacy only or both identifiers
 - If Provider Submits:
 - Legacy Only – Claim will pay
 - NPI Only – Claim will pay if NPI is registered and validated with DPW and can be crosswalked to a legacy number. Otherwise the claim will deny.
 - Both – Claim will process off of the legacy submitted but edits will be triggered if the NPI does not match what is on the crosswalk file.
- **NPI Only:** Beginning May 23, 2008
 - Provider will be required to submit NPI only
 - If Provider Submits:
 - Legacy Only – Claim will deny
 - NPI Only – Claim will pay if NPI is registered and validated with DPW and can be crosswalked to a legacy number. Otherwise the claim will deny.