



NATIONAL PROVIDER IDENTIFIER (NPI) EQUALITYCARE CONTINGENCY PLAN

Background

The Center for Medicare and Medicaid Services (CMS) issued guidance on April 2nd allowing covered entities, such as EqualityCare, to implement contingency plans for accepting legacy provider identifiers after the May 23, 2007 NPI compliance deadline.

As of April 16, 2007, half of eligible Wyoming providers had **NOT** obtained an NPI. EqualityCare is extending its deadline for providers to obtain and register their NPIs by three (3) months to prevent disruption of payment to these providers. Providers now have until August 31, 2007 to obtain an NPI **AND** register it with ACS. However, providers who will be in compliance by May 23, 2007 must begin using it at that time. **Failure to obtain an NPI and register it by August 31, 2007 will result in voluntary termination from the EqualityCare Program beginning September 1, 2007.**

Providers' Roles

Providers who will not be compliant with the May 23, 2007 deadline must complete the attached NPI Contingency/Corrective Action Plan. **At a minimum, Sections A (provider Information) and B (Reason for Noncompliance) must be completed and returned to ACS by May 25, 2007.** If you are unable to complete Section C (Corrective Action Plan) by May 25, 2007, you have until July 1, 2007 to formulate a corrective action plan and resubmit the form to ACS. Non-compliant providers that have submitted the NPI Contingency/Corrective Action Plan will be required to continue using their EqualityCare number in electronic transactions and on paper forms until August 31, 2007 **OR** until they obtain an NPI, register it with ACS, and are in compliance, **whichever comes first.** If a provider's software vendor, billing agent, or clearinghouse is not able to generate NPI-compliant transactions, the provider is not in compliance.

Providers who have already obtained an NPI, registered it with ACS, and are in compliance are required to use their NPI starting May 23, 2007.

Reasons for Non-compliance

Clearinghouse Cannot Generate PHI-Compliant transactions

One third of clearinghouses nationally cannot yet accept NPIs. Providers should check with their clearinghouses to see if they are NPI-ready. If they are not, providers should:

1. Request the clearinghouse's contingency plan.
2. Work with the clearinghouse to determine how the August 31, 2007 deadline for using NPIs can be met.
3. Inform EqualityCare and ACS of the issue by completing the attached NPI Contingency/Corrective Action Plan.

Software Vendor or Billing Agent Does Not Accept NPIs

Half of vendor software is not able to accept NPIs. Providers should check with their software vendors to see if the software is NPI-ready. If it is not, providers should follow the same steps outlined above.



Software Vendor or Billing Agent Does Not Submit Claims with Taxonomy Codes

Vendors may not realize that EqualityCare requires taxonomy codes be used along with NPIs. Paper or electronic claims submitted with NPIs and without taxonomy codes may be denied or rejected. Providers should check with their software vendors to see if claims will be submitted with accompanying taxonomy codes. If software vendor is not able to submit with taxonomy codes, provider should follow the steps outlined above. If claims deny or reject because of taxonomy code issues, providers should contact their vendors.

Other Providers Are Not Sharing NPIs

Providers are required to share their NPIs with any entity needing it for billing purposes. Some providers have expressed concern that it may be difficult to obtain NPIs from other providers included on submitted claims. Other providers may include referring, ordering, supervising, facility, care plan oversight, purchase service, attending, operating and "other" providers. EqualityCare will accept claims with UPINs used for other providers until May 23, 2008.

Providers Not Enumerating

All providers should obtain and register NPIs with ACS by August 31, 2007. If claims cannot be submitted with NPIs for any reason, providers should complete the attached NPI Contingency/Corrective Action Plan.

NPI Contingency/Corrective Action Plan

Instructions: **At a minimum, Sections A and B must be completed and the form returned to ACS by May 25, 2007.** If you are unable to complete Section C (Corrective Action Plan) by May 25, 2007, you have until July 1, 2007 to formulate a corrective action plan and resubmit the form to ACS. All corrective actions plans must end by August 31, 2007.

SECTION A: Provider Information

Provider Name: _____

NPI(s): _____

EqualityCare Number(s): _____

Contact Person: _____

Contact Phone Number: _____

Contact Email Address: _____

SECTION B: Reason for Noncompliance

Not obtaining an NPI is not an acceptable reason for noncompliance.

I will not be in compliance with the requirement to use an NPI by the May 23rd federal deadline for following reason(s):

- Clearinghouse** not able to accept NPIs.
- Vendor Software** or practice management system not able to accept NPIs.
- Billing Agent** not able to accept NPIs.
- Other:** _____

Provide the name of the Clearinghouse, Vendor Software or Billing Agent if you marked one of those three boxes above.

SECTION C: Corrective Action Plan

Please explain your plan to be compliant by EqualityCare's August 31, 2007 deadline. If you need more space, continue on the back of this page or attach additional pages.

Return this form to:
ACS Provider Relations
Attn: NPI Unit
P.O. Box 667
Cheyenne, WY 82003-0667
FAX: 307-772-8405