



# First Health Services Corporation®

A Coventry Health Care Company

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May 8, 2007

## NPI CONTINGENCY PLAN

Last month the Centers for Medicare & Medicaid Services (CMS) announced that it is implementing a contingency plan for covered entities who will not meet the May 23, 2007 deadline for compliance with the National Provider Identifier (NPI) regulations under the Health Insurance Portability and Accountability Act (HIPAA) of 1996.

The CMS guidance clarifies that covered entities that have been making a good faith effort to comply with the NPI provisions may implement contingency plans that could include accepting legacy provider numbers on HIPAA transactions in order to maintain operations and cash flows.

Alaska Medical Assistance announces the following NPI Contingency Plan for health care providers submitting HIPAA-compliant electronic transactions:

1. **Share Your NPI With Alaska Medical Assistance:** Submit NPI information updates to your provider enrollment records no later than June 1, 2007. If you have not already completed and returned your NPI verification form, that form is due no later than June 1, 2007. Please follow the instructions included in the NPI Verification Packet previously provided when completing the form. A copy of the verification form can also be found at <https://alaska.fhsc.com>. Providers who have not yet obtained NPIs need to do so immediately and use the NPIs in HIPAA transactions as soon as possible. Providers can apply for an NPI online at <https://nppes.cms.hhs.gov> or can call the NPI enumerator to request a paper application at (800) 465-3203.
2. **Use It--Dual Use:** Submit both your Medicaid Provider ID number (MCI) and NPI number on electronic transactions. After May 23, 2007, continue to submit both your Medicaid Provider ID number (MCI) and NPI number on electronic transactions
  - a. Each electronic biller will be tested for appropriate NPI crosswalk outcomes before converting to sending only the NPI number on their claims. First Health will notify you about your conversion date after your testing produces successful crosswalk outcomes. First Health will work with you to accommodate unique provider issues.
  - b. Pharmacy claim billers will receive a separate notice outlining the requirements and effective dates for submitting NPI on pharmacy claims.
3. **Full NPI compliance:**
  - a. Full NPI compliance will be assessed on an individual provider basis. As providers successfully test and are approved to convert to billing with only the NPI number, NPI edits will be applied to their claims.
  - b. Alaska Medical Assistance will announce the sunset of the dual use period at a future date. Alaska Medical Assistance will be assessing health care provider submission of NPIs on claims. As soon as the number of claims submitted with an NPI for primary provider fields is sufficient to do so, Alaska Medical Assistance will issue a notice of Full NPI Compliance and the sunset date for accepting Medicaid provider ID (MCI) numbers. In August 2007, Alaska Medical Assistance will conduct the first analysis of the number of submitted claims containing an NPI. If the analysis shows a sufficient number of submitted claims contain an NPI, a sunset date announcement will be issued no later than August 31, 2007. If a sufficient number of claims do not contain NPIs in the August analysis, Alaska Medical Assistance will assess compliance again in November, 2007. Alaska Medical Assistance will provide advance notice to providers of the date when a decision has been made to implement Full NPI compliance.

The Alaska Medical Assistance NPI Contingency Plan is intended to enable our trading partners to continue to move toward compliance in a manner that reduces the potential for operational and cash flow impacts.