National Provider Identifier (NPI) Implementation
Status Assessment

CMS is monitoring implementation of the National Provider Identifier (NPI). Compliance with the NPI rule is required under the HIPAA regulations at 45 CFR 162. As a health and/or prescription drug plan, you are required to accept and send the standard HIPAA transactions (e.g., claims, eligibility, remittance advice, etc.), and to accept or use only the NPI in those transactions as of May 23, 2007. Many health plans invoked contingency plans following CMS' guidance in April 2007, and may be working on their compliance strategy up until May 23, 2008. CMS guidance clarified that covered entities that are making a good faith effort to comply with the NPI provisions may implement contingencies, including accepting legacy provider numbers on HIPAA transactions, in order to allow providers to maintain operations and cash flows. We wish to determine how the implementation process is progressing, and to understand the successes and barriers to compliance.

Please provide CMS a status report that will provide an overall picture of your progress (or your claims processing subcontractor's progress) with NPI implementation. All plans and sponsors are to describe their progress by providing information that addresses the following bullets.

- **NPI Contingency Plan-** Whether your organization is still under a contingency plan with respect to NPI implementation for its Medicare transactions and if so, the date you anticipate lifting the contingency and being fully compliant.

- **NPI Volume-** The percent distribution of Medicare claims volume received from:

    o Pharmacy providers that contain only an NPI, only a Legacy number and an NPI and a Legacy number;
    o Institutional providers (e.g., hospital, SNF, hospice) that contain only an NPI, only a Legacy number and an NPI and a Legacy number; and
    o Professional providers (e.g., physician, therapy, DME) that contain only an NPI, only a Legacy number and an NPI and a Legacy number.

- **Barriers to Implementation**- Describe any barriers or issues hindering your organization's and/or your providers' use of the NPI in electronic transactions?