

Blue Cross and Blue Shield of Florida

National Provider Identifier (NPI) Business Continuity Plan





National Provider Identifier (NPI) Business Continuity Plan

- On April 2, 2007, CMS issued their “Guidance on Compliance with the HIPAA National Provider Identifier (NPI) Rule”.
- The following are key points and clarifications obtained from this guidance:
 - CMS has NOT extended the NPI compliance date beyond May 23, 2007.
 - CMS will focus on covered entities **voluntary** NPI compliance and use a **complaint-driven approach** for enforcement.
 - For a 12-month period beginning May 23, 2007, CMS will not impose penalties on covered entities that deploy **contingency plans** provided they have made reasonable and diligent efforts to become compliant with the NPI rule.
 - Health Plans must also demonstrate where they have helped facilitate the compliance of their electronic trading partners, their outreach initiatives and their testing efforts.
 - CMS will place a strong emphasis on good faith efforts, demonstrable progress and sustained actions
 - Providers that have not obtained their NPIs must do so prior to May 23, 2007.



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- BCBSFs NPI Business Continuity Plan: Phase I (effective May 23, 2007) :
 - BCBSF will continue to operate under Phase I of the NPI Dual-Use Strategy. Under this implementation strategy, BCBSF accepts and process inbound HIPAA-AS electronic transactions that contain either the BCBSF Provider Number only or the BCBSF Provider Number with the NPI.
 - Outbound Electronic Remittance Advice (ERA 835):
 - BCBSF will NOT implement the outbound NPI enabled 835 ERA (Electronic Remittance Advice) until the electronic trading partner can certify and validate their NPI readiness.
 - BCBSF is piloting an NPI Enabled 835 Testing and Certification Process. This process will enable external electronic trading partners to certify and validate their readiness to accept and process an NPI-enabled 835.
 - General availability of the BCBSF NPI Enabled 835 Testing and Certification Process is planned for general available on or before November 1, 2007.



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- BCBSFs NPI Business Continuity Plan: Phase II (effective 4th quarter of 2007):
 - BCBSF will begin to operate under Phase II of the NPI Dual-Use Strategy. Under this implementation strategy, BCBSF will accept and process inbound HIPAA-AS electronic transactions that contain either the BCBSF Provider Number only or the NPI only or the BCBSF Provider Number with the NPI.
- BCBSFs NPI Business Continuity Plan: Phase III (effective May 23, 2008):
 - BCBSF will begin to operate under Phase III of the NPI Dual-Use Strategy. Under this implementation strategy, BCBSF will accept and process inbound HIPAA-AS electronic transactions that contain the NPI only.
 - Inbound electronic transactions received without the NPI as a provider identifier will be rejected at the BCBSFL electronic gateway as a Provider Correctable Error.



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- Throughout all phases of the NPI Business Continuity Plan, BCBSF will:
 - monitor NPI registrations, uptake and usage on inbound electronic transactions
 - monitor the percentage of outbound NPI enabled 835 vendors/providers that are NPI Certified (i.e. they can demonstrate their capability to accept and successfully process an NPI enabled 835)
 - continue to capture NPI-to-Legacy ID mismatches and NPI registration failures for resolution by Provider Relations (i.e. NPI Exception Reports)
 - continue to work with internal business partners and operational front-line staff to ensure that no provider affecting operational issues remain unresolved.
 - continue with our external NPI Outreach Initiative and take advantage of targeted communications through the use of NPPES data.



Questions



George Vancore
904-905-0176
george.vancore@bcbsfl.com