



Independence Blue Cross (IBC) NPI Contingency Plan

BACKGROUND

In response to concerns over the health care industry's state of readiness for the May 23, 2007 National Provider Identifier (NPI) compliance date, the Centers for Medicare & Medicaid Services (CMS) announced that, through May 23, 2008, they will not impose penalties on covered entities that deploy contingency plans to facilitate NPI compliance of their trading partners. CMS is encouraging health plans to assess the readiness of their provider communities and determine the need to implement contingency plans to maintain the processing of payments, while continuing to work toward compliance.

Independence Blue Cross (IBC) has conducted sustained and targeted outreach to the provider community, requesting that all providers share their NPIs with us prior to the May 23, 2007 NPI compliance date. When providers share their NPIs with IBC, we are able to link the NPIs to existing data in our internal processing systems. We call this process "registering" NPIs with IBC. This is the only way to ensure that all existing provider data in the IBC claims (and other) systems are properly linked to newly assigned NPIs. To mitigate any potential impact in a provider's cash flow, we have requested that providers register their NPIs with us *prior to submitting an NPI claim*.

Because of providers responding favorably to IBC's requests, we have made demonstrable progress to date in receiving a significant percentage of provider NPIs. Despite this progress, less than 100% of our participating (and other) providers and trading partners have registered their NPIs with us. In order to allow additional time for providers to register their NPIs with us, IBC is deploying the contingency plan outlined below, which is in alignment with CMS' guidance.

IBC'S CONTINGENCY PLAN: DUAL USE

Beginning May 23, 2007, IBC will have the ability to accept claims with an NPI as the primary identifier if the provider has registered their NPI with us. However, providers must register their NPI with IBC prior to submitting NPI-only claims. As early as July 1, 2007, NPI-only claims will reject if the provider has not registered their NPI with us. To avoid any potential business disruption for those providers who have not registered their NPI with IBC, we have recommended a dual use strategy for claims submissions. The dual use strategy allows providers to submit all electronic and paper claims with NPIs *and* 10-digit legacy provider identifiers (IBC-assigned IDs providers use to identify themselves as an IBC participating health care provider). We will continue this dual use strategy after the May 23, 2007 compliance date until further notice while continuing our provider outreach and testing efforts. If providers have registered their NPI with IBC or submitted an NPI with a CMS certification, they may continue to submit claims with their NPI *and* 10-digit legacy identifier, consistent with our dual use strategy, until further notice. Our dual use strategy is intended to ensure that IBC is NPI compliant, but in a manner that maintains operations, recognizes providers' varying states of readiness, and avoids unnecessary disruption in their cash flow.

IBC will assess provider readiness and the continued necessity of its dual use strategy periodically. Once IBC determines that a sufficient percentage of providers have registered their NPIs with us and are submitting their NPIs on claims, we will end the contingency plan and begin rejecting claims without an NPI as the primary identifier. We will give 60 days prior notice to providers, their clearinghouses, and vendors before implementing this course of action. However, after May 23, 2008, only the NPI will be accepted on inbound or outbound transactions.

More information about IBC's NPI Dual Use Claims Submission, including electronic and paper claim submission instructions and relevant FAQs, is available at www.ibx.com/providers/npi

STEPS IBC HAS TAKEN TO ASSIST PROVIDERS WITH NPI COMPLIANCE

IBC has assisted providers with their NPI compliance efforts by establishing a comprehensive targeted communication and outreach campaign to the provider network.

The outreach campaign focuses on the following goals:

- 100% receipt of NPIs from our participating providers
- Continued education of providers on NPI enumeration, registration, and compliance
- Increased provider readiness/compliance

To further assist providers with NPI-related questions, IBC has increased NPI awareness internally with employee training modules and various print and electronic communications.

CONTINUED STEPS IBC WILL TAKE TO ASSIST PROVIDERS

IBC will continue to assist providers with their NPI compliance efforts by following an established plan, which includes:

- Continued targeted communications and provider outreach to increase NPI registration
- Continued internal awareness and education through employee training modules and instructor-led training sessions
- Ongoing monitoring and assessment of provider network readiness

For more information regarding NPI, including instructions for obtaining an NPI or registering NPIs with IBC, please visit www.ibx.com/providers/mpi