

REGENCE CONTINGENCY GUIDELINES FOR NATIONAL PROVIDER IDENTIFIER (NPI) IMPLEMENTATION

On 4/2/07, the Centers for Medicare & Medicaid Services (CMS) announced that it is implementing a contingency plan for covered entities (other than small health plans) 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. Covered entities that have been making a good faith effort to comply with the NPI provisions may, for up to 12 months (5/23/2008), implement contingency plans that could include accepting legacy provider numbers on HIPAA transactions in order to maintain operations and cash flows.

Regence's NPI Contingency Plan is as follows:

1. Effective 5/23/07 through 5/22/2008
 - a. Regence will accept Legacy ID only or Legacy ID and NPI (dual-use mode) on the 837
 - b. Regence will accept Legacy ID or an NPI on the 834 HIPAA standard transactions.
 - c. Regence will send Legacy ID's and the NPI on the 835 remittance advice if we have an NPI loaded in our provider files. If we do not have an NPI loaded in our provider files, the 835 remittance advice will contain the Legacy ID only.
 - d. Regence will accept Legacy ID only on the 27x transactions.
2. Do not send an NPI as the sole identifier on any HIPAA standard transactions until you hear from Regence that we are able to accept it alone for processing.
3. Effective 5/23/08, providers must submit all HIPAA standard transactions with an NPI as the sole identifier. Transactions submitted without an NPI as the sole identifier will be rejected at the clearinghouse or EDI level of processing.

Applying for an NPI is fast, easy and free. Visit the National Plan/Provider Enumeration System (NPPES) website at <https://nppes.cms.hhs.gov/>.

Further information concerning this issue is available on the CMS Web-site at <http://www.cms.hhs.gov>. The site also contains contingency plan guidance for the industry in a document titled "Guidance on Compliance with the HIPAA National Provider Identifier Rule.