

THEDACARE'S NPI CONTINGENCY PLAN

CMS will not impose penalties on covered entities that deploy contingency plans if they have made reasonable and diligent efforts to become HIPAA NPI compliant. ThedaCare has obtained and has been submitting both legacy and NPI numbers to the carriers as of May 23, 2007. As ThedaCare receives notification from individual carriers, legacy numbers will no longer be submitted. ThedaCare will continue to comply with the mandated May 23, 2007 federal compliance deadline by submitting NPIs on electronic transactions.

- I. System Analysis/Implementation
 - Performed upgrades on all applicable systems that send standard transactions
 - Applied rules/edits to “hold” claims that do not have NPI numbers for primary/secondary providers
 - Tested CMS-1500 paper and 837 ANSI electronic claims to ensure the NPI and legacy provider numbers appeared in the correct location

- II. Enumeration/Dissemination
 - Applied for Type I & Type II NPI's for all covered health care providers and entities
 - Sent Type I & Type II NPI's to pharmacies and are also including provider's NPI on all faxed prescriptions
 - Shared NPI's with other outside entities such as health plans and medical groups
 - Utilizing NPI registry to capture NPI's on secondary providers (when it is available)

- III. Learning/Training
 - Holding internal meetings to discuss process flows and progress on becoming compliant
 - Attending available Roundtables, audio casts, teleconferences and HIPAA COW conferences

- IV. Testing
 - Currently sending all transactions as dual use.
 - Have sent sample claims with NPI only to Americhoice to see if we receive payment
 - Sending sample Medicare claims with NPI only to ensure payment as well as monitor any secondary claims that Medicare has a crossover arrangement with
 - Will send NPI only to BCBS beginning 1/25/08 per their contingency plan.