

WellSpan Health's NPI Contingency plan

On January 23, 2004, HHS was required to adopt the NPI as the standard unique health provider identifier for healthcare providers. The NPI is required to be used by covered entities in standard HIPAA transactions replacing the current legacy numbers. The provision became effective May 23, 2005 and all covered entities had to be in compliance by May 23, 2007. In efforts to comply with this deadline WellSpan Health formed a committee to implement and monitor the NPI process. WellSpan Health, and its covered entities, has applied for and obtained all NPI's deemed necessary to meet the new HIPAA billing requirements. We in turn have provided our NPI numbers to our health plans and other trading partners. Our organization has put forth our best efforts to obtain and accumulate all NPI's for referring and prescribing physicians needed for billing purposes. For those physicians whom have not provided us their NPI we have a mechanism in place to obtain them until CMS publishes the data dissemination rule.

On April 2, 2007, HHS provided guidance regarding contingency plans for NPI implementation. As a result WellSpan Health's contingency plan will be to submit bills with both legacy and NPI numbers beginning May 23, 2007 through May 22, 2008, unless one of our health plans requires earlier compliance. We will handle claims issues as we become aware of them.