

Date: 12/18/07

Web Announcement 172

NPI News from CMS: Requirement to Update Information in NPPES and a New Key Date for Medicare Providers

The Centers for Medicare & Medicaid Services (CMS) issued the following announcements regarding the National Provider Identifier (NPI):

Requirement to Update Information in the National Plan and Provider Enumeration System (NPPES)

Health care providers who are covered entities under the Health Insurance Portability and Accountability Act (HIPAA) are required by the NPI Final Rule to update their NPPES data. The Final Rule [at (162.410(a)(4)] states that covered health care providers must notify the NPPES of changes in their required NPPES data elements within 30 days of the changes. Failure to provide updated information may be considered an act of non-compliance with the NPI regulation, and a complaint may be filed against covered health care providers who do not comply with this provision of the rule.

Most updates and changes can be made by health care providers over the web at <https://nppes.cms.hhs.gov/> using the User IDs and passwords they selected when they first applied for their NPIs. If they applied on paper, most health care providers can submit updates or changes over the web and can select User IDs and passwords at the time of the update.

Certain changes or updates, however, must be made on paper (form CMS-10114), as they require the original signature of the health care provider or, for an organization health care provider, the signature of the Authorized Official. Such changes include:

1. Applications for NPIs, and all updates/changes, from individuals who do not have Social Security Numbers (SSNs) or who do not want to report their SSNs to NPPES;
2. All requests to deactivate NPIs;
3. All requests to reactivate NPIs;
4. All changes to incorrectly submitted SSNs;
5. All changes to incorrectly submitted dates of birth;
6. All changes to incorrectly submitted Employer Identifier Numbers (EINs);
7. All changes of EINs;
8. Password resetting changes due to changes to the Contact Person or Authorized Official.

When to Contact the NPI Enumerator for Assistance

Your health plans cannot assist you with NPI questions that should be directed to the NPI enumerator. However, the issues with which the NPI Enumerator can assist you are also limited to the following topics:

- Status of an NPI application, update or deactivation
- Forgotten/lost NPI
- Lost NPI notification
- Trouble accessing NPES
- Forgotten password/User ID
- Need to request a paper application

Health care providers needing this type of assistance may contact the NPI Enumerator at 1-800-465-3203, TTY 1-800-692-2326, or email the request to the NPI Enumerator at CustomerService@NPIenumerator.com.

The NPI application is also a good source of information. Please refer to the NPI application instructions for clarification on information to be submitted in order to obtain an NPI or update your record. You can also refer to the “Application Help” tab located on the NPES website for additional assistance while you are online.

Please Note: The NPI Enumerator’s operation is closed on federal holidays.

Important Information for Medicare Providers

Medicare Announces a New “Key” NPI Date

This is an important message for physicians, other practitioners, providers, and suppliers that bill Medicare carriers, Medicare Administrative Contractors for Medicare Parts A and B (A/B MACs), and Durable Medical Equipment Medicare Administrative Contractors (DME MACs) using an electronic claim form (ASC X12 837P) or paper claim form (CMS-1500):

The Centers for Medicare & Medicaid Services (CMS) is pleased to report that the vast majority of Medicare claims are being sent to Medicare with an NPI. Moreover, the Medicare NPI crosswalk is successfully crosswalking NPIs to legacy numbers for most claims. Given these favorable results, we (CMS) are taking the next step towards full implementation of the NPI in Medicare.

Effective March 3, 2008, your Medicare fee-for-service claims must include an NPI in the primary fields on the claim (i.e., the billing, pay-to, and rendering fields). You may continue to submit NPI/legacy pairs in these fields or submit only your NPI on the claim. You may not submit claims containing only a legacy identifier in the primary fields. Failure to submit an NPI in the primary fields will result in your

claim being rejected or returned as unprocessable beginning March 1, 2008. Until further notice, you may continue to include legacy identifiers only for the secondary fields.

Medicare Informational Warnings to Those Who Are Not Submitting NPIs on Claims

Since October 15, 2007, Medicare physicians, non-physician practitioners and other providers and suppliers who bill carriers and MACs using the ASC X12 837P or CMS-1500 receive informational warnings that indicate there was no NPI shown in the primary provider fields on your claim(s). Medicare is including these informational warnings on your pre-pass reject reports provided to you directly or to your bulletin board.

Many Medicare physicians, non-physician practitioners, and other providers and suppliers are not using NPIs in their Medicare claims, even in the primary provider fields (billing/pay-to and rendering). While, until March 1, you may continue to submit legacy identifiers in these fields, we strongly encourage you to begin using your NPI as well. You may use the NPI/PIN pair or the NPI-only to identify the billing/pay-to and rendering providers.

Medicare informational warnings, called “Provider Identification Code Qualifier Invalid Value” messages, will be labeled M389, M390, M391 and/or M392, but, again, these are only reminders. If you receive one of these messages and you are certain that your claim was submitted with an NPI, you may wish to contact your clearinghouse or billing agent to ascertain the reason behind the message. It is possible that the clearinghouse or billing agent removed the NPI prior to submitting the claim to Medicare. You may also want to call your carrier/MAC to ask about the message and how you can correct future claims.

The informational warnings consist of one or more of the following messages:

M389 2010AA NM108 Billing Provider Identification Code Qualifier Invalid value.

The edit sets when the 2010AA loop and NM1 are submitted but NM108 does not contain XX. If the claim contains a 2300 REF01 = P4 and REF02 = 31 (VA claim), the edit does not set.

M390 2010AB NM108 Pay To Provider Identification Code Qualifier Invalid value.

The edit sets when the 2010AB loop and NM1 are submitted but NM108 does not contain XX. If the claim contains a 2300 REF01 = P4 and REF02 = 31 (VA claim), the edit does not set.

M391 2310B NM108 Claim Level Rendering Provider Identification Code Qualifier Invalid value.

The edit sets when the 2310B loop and NM1 are submitted but NM108 does not contain XX. If the claim contains a 2300 REF01 = P4 and REF02 = 31 (VA claim), the edit does not set.

M392 2420A NM108 Detail Level Rendering Provider Identification Code Qualifier Invalid value.

The edit sets when the 2420A loop and NM1 are submitted but NM108 does not contain XX. If the claim contains a 2300 REF01 = P4 and REF02 = 31 (VA claim), the edit does not set.

Testing Claims with Only the NPI

If you already bill using the NPI/legacy pair in the primary fields and your claims are processing correctly, now is a good time to submit to your contractor a small number of claims containing only the NPI. This test will serve to assure your claims will successfully process when only the NPI alone is mandated on all claims. If the results are positive, begin increasing the number of claims in the batch.

If your claims reject, first go into the NPPES website located at <https://nppes.cms.hhs.gov/> and validate that your information is correct and that you reported your Medicare legacy identifier(s) in the “Other Provider Identification Numbers” section. Your Medicare legacy identifier(s) would be the number(s) that you used – prior to using the NPI – as the billing/pay-to and rendering providers. If the NPPES information is correct and you reported your Medicare legacy identifier(s), call your contractor and ask that they validate what is in their system.

Need More Information?

Not sure what an NPI is and how you can get it, share it and use it? As always, more information and education on the NPI can be found through the CMS NPI webpage at www.cms.hhs.gov/NationalProvIdentStand on the CMS website. Providers can apply for an NPI online at <https://nppes.cms.hhs.gov> or can call the NPI enumerator to request a paper application at 1-800-465-3203. Having trouble viewing any of the URLs in this message? If so, try to cut and paste any URL in this message into your web browser to view the intended information.

Note: All current and past NPI communications issued by CMS are available by clicking “CMS Communications” in the left column of the www.cms.hhs.gov/NationalProvIdentStand website.

Getting an NPI is free - not having one can be costly.