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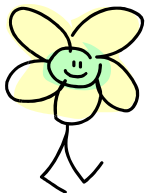
# Medicare Provider Identifier Crosswalk Overview & Progress Update

September 27, 2006

# New Application Driven by HIPAA Regulations

## Project Background:

- Part of the 1996 Administrative Simplification of HIPAA.
- NPI Final Rule published January 23, 2004.
- Adopts NPI as standard unique identifier for health care providers.
- Effective date of final rule: May 23, 2005.
- Compliance date: May 23, 2007.
- Small plan compliance date: May 23, 2008.
- Replaces the use of proprietary & legacy provider identifiers in standard transactions for health care providers.
- Ten positions, all numeric, check-digit 10<sup>th</sup> position.
- Expected to last indefinitely; supply to exceed demand.
- Never expires/may be deactivated/reactivated.
- No embedded intelligence.
- Intelligence embedded in legacy identifiers must be derived through other data elements. (e.g., state, provider type, taxonomy code).

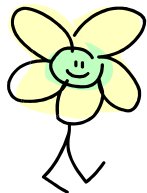


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# Medicare Provider Identifiers Now in Use

## Background:

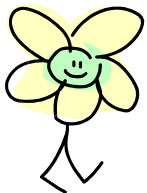
1. The Online Survey, Certification and Reporting (OSCAR) numbers.
2. Medicare Billing Numbers also known as Provider Identification Numbers (PINs).
3. National Supplier Clearinghouse Numbers (NSC Numbers).
4. Unique Physician Identification Numbers (UPINs).
5. National Council for Prescription Drug Programs (NCPDP Provider Numbers).



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# CMS NPI Project Strategy

- CMS will be HIPAA-compliant with the NPI standard as of the compliance date of May 2007.
- Implementing NPI at CMS is a major undertaking.
- Affects databases, systems and organizations throughout agency.
- Often compared to Y2K in terms of breadth of changes.
- However Y2K was mechanical; whereas NPI is more analytical.
- Taking a Y2K like approach with a central program management function.
- Mitigate risk and reduce cost by staging changes to internal legacy systems – not a “big bang” approach.
- Continue to issue and use legacy identifiers (except UPINs).
- Each legacy system determines an appropriate schedule for implementing the changes needed to use the NPI in internal processing.
- Future project to remove dependency on legacy numbers is being discussed.

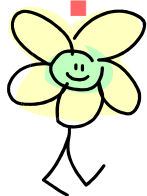


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# Provider Identifier Crosswalk – Purpose/Timeline

Ensure that the Medicare NPI Provider Crosswalk System Initiative's schedule is met and closely coordinated with the implementation strategy for the larger multi-faceted CMS NPI Initiative:

- A test Medicare NPI Provider Crosswalk file shall be built, populated and useable extracts made available to the Standard Claims System Maintainers for integrated testing with the Standard Claims Systems no later than **July 2006**.
- The Medicare NPI Provider Crosswalk database shall be fully built, populated and available to the FFS Claims Systems in a production mode no later than **October 1, 2006**.
- The Medicare NPI Provider Crosswalk System shall be available to all Medicare entities requiring access to the crosswalk of provider identifier information no later than **January 3, 2007**.
- The Medicare Provider Identifier Crosswalk shall be fully operational in the CMS FFS Claims processing no later than **May 23, 2007**.

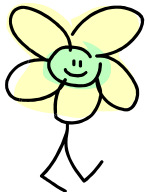


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# Implementation Strategy for Medicare FFS Claims

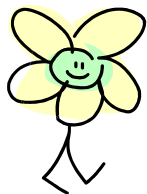
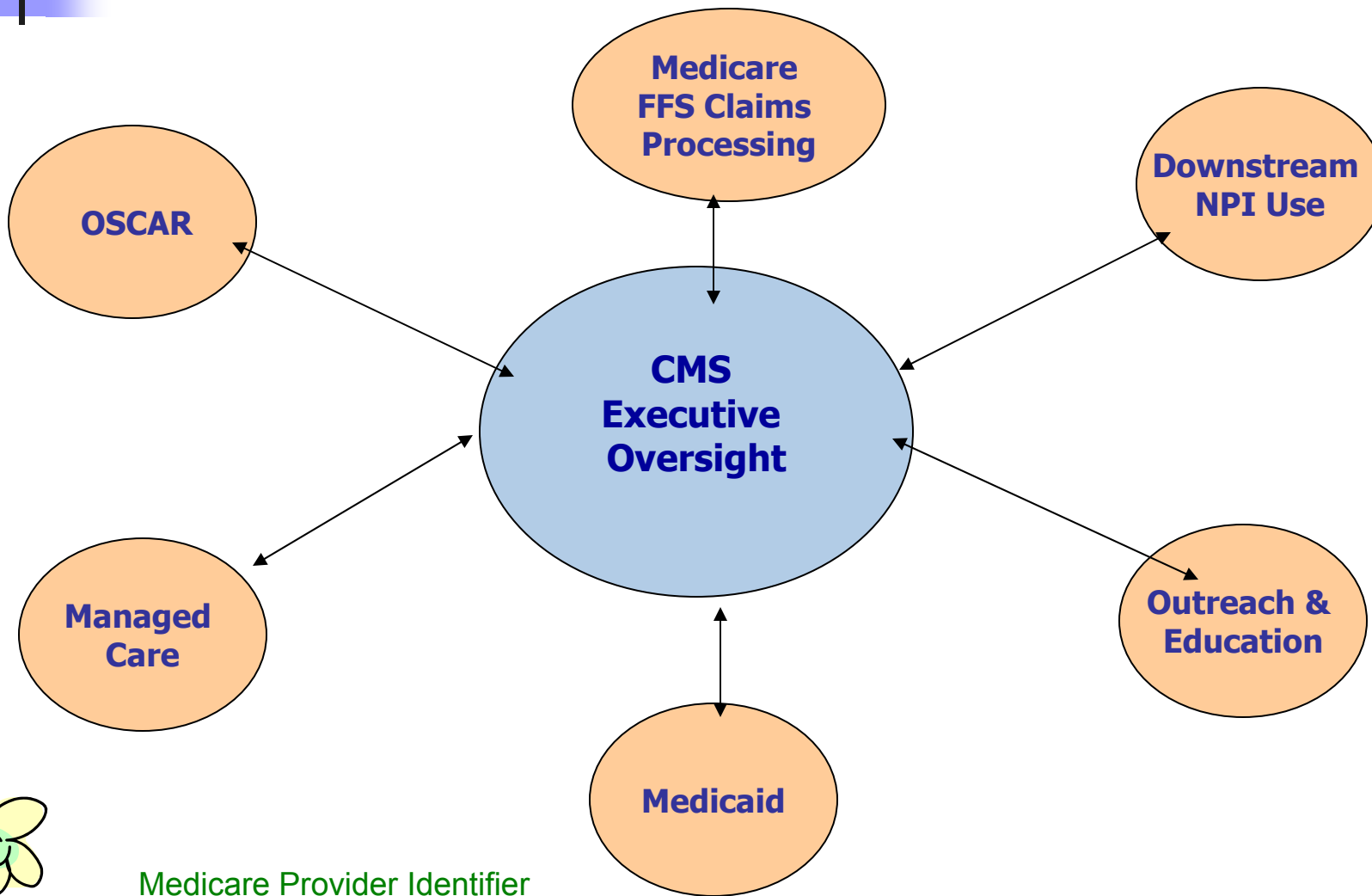
Stage	Time Period	Provider Identifiers Accepted/Sent
Pre-NPI	Through January 2, 2006	Legacy/Legacy
Stage 1	January 2006 Release	Legacy/Legacy or Both/Both
Stage 2	October 2006 Release	Legacy/Legacy or Both/Both or NPI/Both
Stage 3	April 2007 Release	NPI/NPI or NPI/Both
Stage 4	April 2008 Release	NPI/NPI

Dual Identifier Strategy



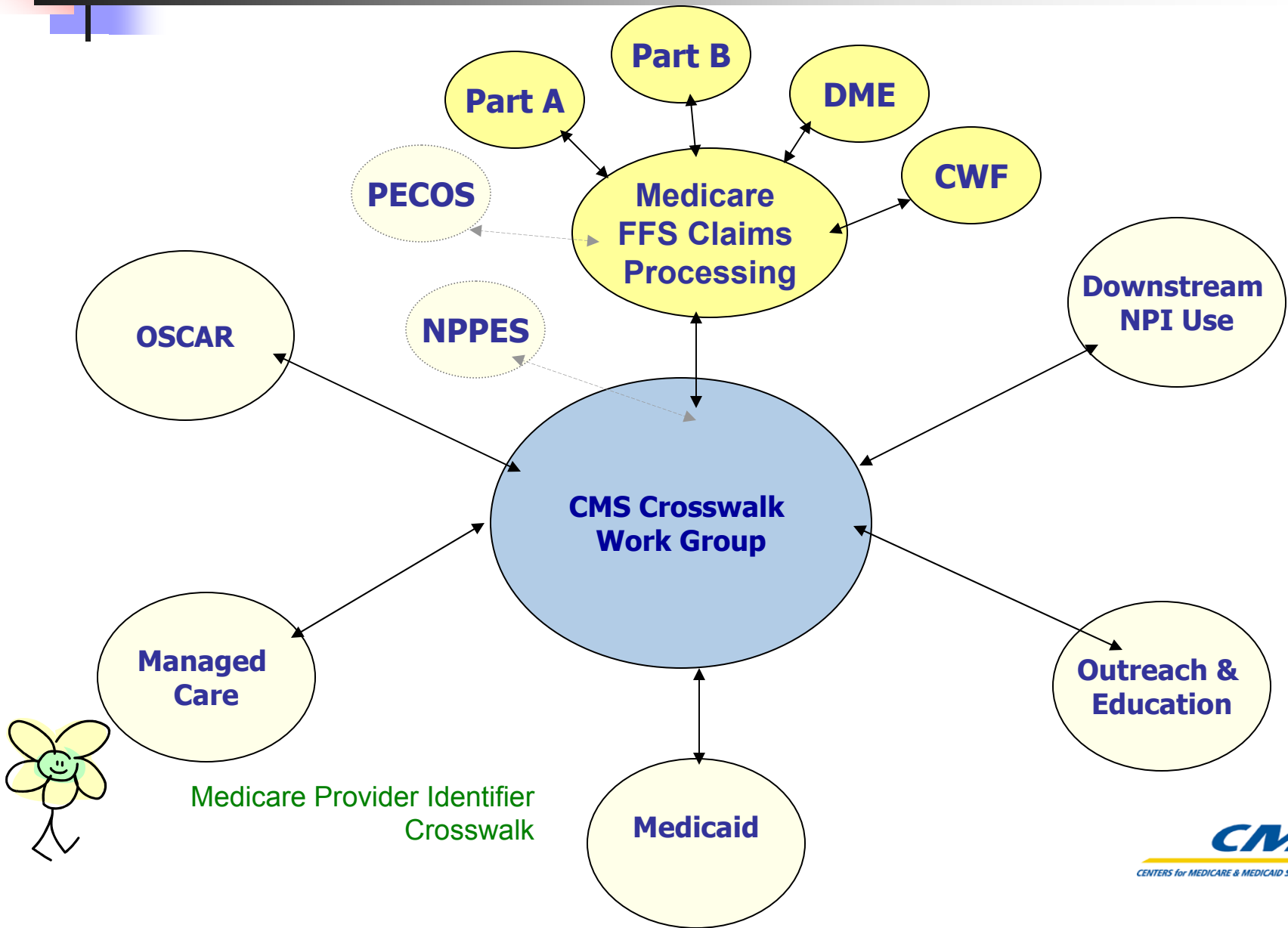
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# CMS NPI Subgroups – Affected Applications & Interoperability



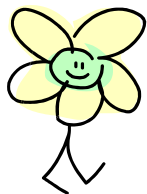
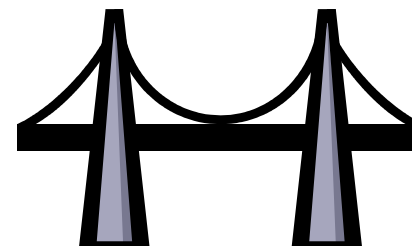
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# Affected Applications & Interoperability



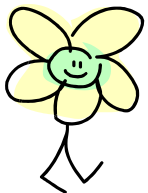
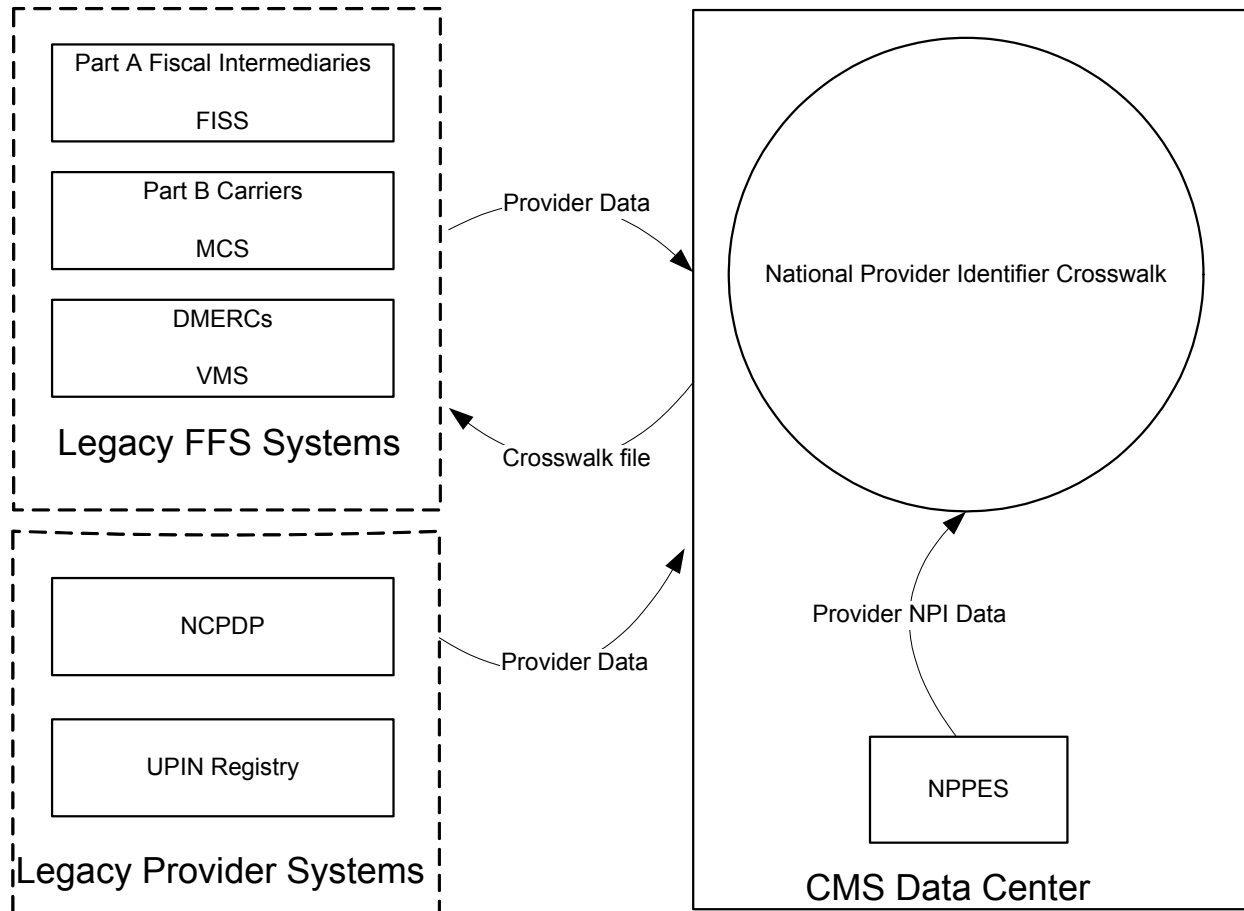
# NPI Crosswalk – Data Feeds

- Legacy Systems
  - Part A / OSCAR – FISS
  - Part B / PIN – MCS
  - DMERC / NSC – VMS
  - NCPDP
  - UPIN Registry
- NPI Data
  - NPPES



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# NPI Crosswalk – System Interface



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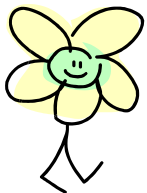


# Realities in Claims

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- Given that NPIs are not to be issued in a one-to-one relationship with legacy provider IDs,
- And enumeration is under the control of the providers,
- Payers, including CMS Medicare, must look to use other data on the claim to drill down to the appropriate legacy identifier in order to process claims,
- Taxonomy Code is just one additional piece of data that payers are looking at using.
- Others include addresses, zip codes, service facility codes, procedure/service codes.

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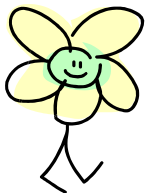




# Crosswalk Schedule

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- Test extracts were made available to the Standard Claims System Maintainers for integrated testing with the Standard Claims Systems in **July 2006**.
- Built, populated and available to the FFS Claims Systems in a production mode no later than **October 1, 2006**.
- Available to all Medicare entities requiring access to the crosswalk of provider identifier information no later than **January 3, 2007**.
- Fully operational in the CMS FFS Claims processing no later than **May 23, 2007**.



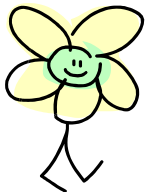
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# Data Dissemination

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- NPI Final Rule (1/23/04) stated that a data dissemination policy would be published
- Data dissemination is key to NPI implementation
- Privacy and right-to-know influencing the data dissemination policy
- Final paper is making it's way through the approval process

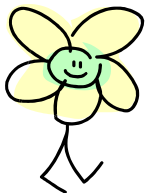


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# Transition Period

## October 2, 2006 thru May 22, 2007

- Strongly encourage BOTH legacy and NPI.
- Accept Legacy Only. Accept NPI Only.
- Implement Crosswalk with NPIs Assigned to Date.
- Reject Claims Submitted with Only NPI if NPI not on Crosswalk.
- Reject Claims Submitted with Both NPI and Legacy if NPI to Legacy Pair Doesn't Match Crosswalk.
- Reject to Submitter Claims Submitted with Only NPI if NPI Can Not Be Uniquely Mapped to a Single Legacy Identifier.
- Track, Monitor & Analyze Receipts.



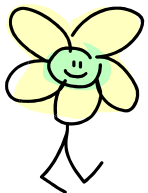
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## CMS Resources

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- CMS NPI web page  
[www.cms.hhs.gov/NationalProvIdentStand](http://www.cms.hhs.gov/NationalProvIdentStand)
- CMS Medicare Learning Network (MLN)  
[www.cms.hhs.gov/MLNGenInfo](http://www.cms.hhs.gov/MLNGenInfo)
- NPI Viewlet  
[www.cms.hhs.gov/apps/npi/npiviewlet.asp](http://www.cms.hhs.gov/apps/npi/npiviewlet.asp)
- NPI Final Rule  
[www.cms.hhs.gov/NationalProvIdentStand/Downloads/NPIfinalrule.pdf](http://www.cms.hhs.gov/NationalProvIdentStand/Downloads/NPIfinalrule.pdf)



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