

Bulletin ID: No. 28 - Department of Mental Health (DMH) National Provider Identification (NPI) Status Update

The purpose of this document is to update the status of the District of Columbia Department of Mental Health's (DMH's) good faith efforts and its compliance with contingency plans offered by its trading partners as well as to promulgate DMH's National Provider Identification (NPI) contingency plan for its provider network. DMH is defined as a covered entity under the Health Insurance Portability and Accountability (HIPAA) regulations and is required to comply with its provisions. As of May 23, 2007, all covered entities must comply with an "administrative simplification" provision which states that the NPI is the only standard, unique identifier allowed to be used to process provider's claims. In April of 2007, The Center for Medicare and Medicaid Services (CMS) released guidance stating that while the legislation remains intact, CMS would not enforce compliance until May 23, 2008 as long as covered entities are showing good faith efforts at compliance.

DMH is actively pursuing NPI compliance through multiple work efforts. Internally, DMH is in the second round of testing with its NPI compliant software upgrade and has obtained all required NPI numbers for its different organizational units. The upgraded software will allow DMH to process claims in a compliant manner and is planned to "go-live" mid-June. In the meantime, DMH is testing an alternate method of processing claims with NPI numbers with its current software version. This temporary fix allows the claims to continue to be processed as usual.

After DMH installs the upgraded claims software, the agency will have the ability to process claims with either a NPI number, if its trading partners are ready to receive it, or the previously used provider number. DMH will follow future Medical Assistance Administration (MAA) guidance regarding when NPI numbers will be required to adjudicate claims.

DMH is also engaged in an outreach program with its providers to communicate the requirements of the administrative provision for NPI number, assist in compliance efforts, and track NPI compliance progress. DMH has successfully processed test files containing NPI numbers with one of its providers using the alternate method described. As other providers complete the necessary software upgrades, these testing efforts will continue.

As of May 23, 2007, DMH will be required by the MAA to continue to submit all claims with DMH's Medicaid Provider Number, and NOT their NPI. Therefore, in order to ensure an uninterrupted flow of payments, DMH requests that all MHRS providers continue to submit claims with their Medicaid provider number to allow for processing by DMH/MAA. Please see MAA Action Transmittal 07-15 issued April 27 for more information. Claims submitted with an NPI to MAA will not be processed by MAA and therefore DMH cannot accept them.

MAA did not indicate when NPI numbers will be required for processing, and wrote that a date will be provided in late 2007. DMH will follow this guidance when it is released, and encourages providers to do the same. In the meantime, DMH requests that providers continue to apply for NPI numbers and make the necessary system upgrades in order to process claims. Once the NPI

has been received, providers should report the issued NPI numbers to MAA as per instructions in 07-15 and to DMH at the following address:

Ms. Venida Hamilton
Director, Provider Relations Department
DC Department of Mental Health
64 New York Avenue, 4th Floor
Washington, DC 20002

Going forward, the payment relationship between DMH, MAA, and DMH's providers will be undergoing a transition. After the transition, DMH will still adjudicate claims, but the issuance of payment for Medicaid claims will be transitioned to the MAA. From that point forward, DMH's providers will be required to follow any and all guidance issued by DMH and / or MAA in order to continue to receive payments for Medicaid claims.