

## Part B Insider (Multispecialty) Coding Alert

### NPIs: Providers Breathe A Little Easier With 1-Year NPI Extension

#### CMS admits defeat, promises progress on NPI-sharing

**Good news:** You'll have an extra year to get up to snuff with your national provider identifier (NPI) compliance.

With less than two months left before crunch time, the **Centers for Medicare & Medicaid Services** (CMS) decided to give you until May 23, 2008, to become NPI-only with all your transactions. If you're not quite ready by May 23, 2007, you can implement a -contingency plan- to maintain your cash flow, CMS said in a release.

**Why the change?** CMS tried to make it sound as if providers weren't ready for the original deadline. But CMS was also behind on its obligations, noted the **Medical Group Management Association** (MGMA). CMS failed to issue a policy that would -facilitate the communication of NPIs,- said MGMA president and CEO **William Jessee** in a release.

Without any CMS policy, providers didn't know how to obtain the NPIs of doctors who referred patients to them. The MGMA has posed a sample letter to request a referring doctor's NPI on its site at [www.mgma.com](http://www.mgma.com), but CMS has been promising a -Data Dissemi-nation Notice- on NPI-sharing for years now.

The lack of this CMS policy has -hindered industry efforts to meet the original compliance date,- MGMA said.

**To come:** CMS promises it will soon make data available to help you develop -crosswalks- between old provider numbers and NPIs.

Meanwhile, CMS hasn't actually suspended the original May 2007 compliance date. Rather, the agency says it will have a relaxed enforcement regime until May 2008. CMS will focus on -obtaining voluntary compliance- and will only enforce the NPI requirement in response to complaints.

If CMS receives a complaint before May 2008 that you haven't implemented NPIs yet, CMS will notify you in writing. Then you have a chance to show that you're in compliance, document your -good faith efforts- to comply, or submit a corrective action plan. CMS will look at NPI compliance on a case-by-case basis.

CMS will judge your -contingency plan- based on whether you've increased external testing with -trading partners,- and whether your providers have actually obtained NPIs.