MDS Alert

MDS & Billing News

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 providers until May 23, 2008 to become NPI-only with all their 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. 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.

Your Medicare/Medicaid provider number has a new name. That's according to a recent survey & cert memo. "Following the implementation of the National Provider Identifier (NPI), the Medicare/Medicaid Provider Number will continue to be issued to certified providers/suppliers and used on all Survey and Certification, and patient assessment transactions," states the memo. In order to distinguish its role from that of the NPI, the Medicare/Medicaid Provider Number has been renamed the Centers for Medicare & Medicaid Services Certification Number (CCN)," effective immediately, according to the memo. When the Medicare/ Medicaid Provider Number (also known as the Online Survey, Certification, and Reporting [OSCAR] Number; Medicare Identification Number; or provider number) is requested, provide the CCN, instructs CMS.