

## Health Information Compliance Alert

### Industry News: Physicians' Claims Made Easier With NPI Claim Fields

CMS warns against denials with incorrect claims.

Physicians will have one less thing to worry about when Jan. 1 hits. The **Centers for Medicare & Medicaid Services** (CMS) has bumped back its requirement to include a National Provider Identifier (NPI) in all primary fields on the claim to March 1, CMS says in a recent message to providers.

Starting in March, providers must use their NPI in the billing, pay-to and rendering 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," CMS warns.

CMS will allow legacy numbers by themselves in secondary fields -- such as those for referring physicians -- "until further notice," the agency says. That's a backtrack from the agency's earlier instruction to use NPIs in secondary fields by May.

OIG Announces Plans For 2008

The **HHS Office of Inspector General** recently released its 2008 work plan, and rehab services are clearly on the radar. As usual, the OIG will be targeting issues such as medical necessity and appropriateness of payments.

The following are specific settings the agency noted as review targets:

- CORFs. The OIG promised to look at comprehensive outpatient rehabilitation facilities' PT, OT and SLP claims. These plans are products of prior reviews the OIG conducted in outpatient rehab facilities and nursing homes that revealed questionable billing practices.
- HHAs: The OIG plans to audit Part B therapy claims for home health and did not mention auditing therapy claims on PPS episodes. But that doesn't mean providers should relax. The feds will still have their eye on home health therapy under PPS.
- SNFs: The OIG will also have its eye on Part B services provided in skilled nursing facilities. That could include rehab services.
- Medicaid payments: Finally, the OIG plans to review the appropriateness of PT and OT claims paid by state Medicaid programs.

To read the full Work Plan, visit [http://oig.hhs.gov/08/Work\\_Plan\\_2008](http://oig.hhs.gov/08/Work_Plan_2008).