



**GEORGIA DEPARTMENT OF  
COMMUNITY HEALTH**

**Georgia Medicaid  
National Provider Identifier (NPI) Project  
Contingency Plan**

**Version 1.3**

**Organization Name:** Georgia Department of Community Health, Division of Medical Assistance Plans

**Plan Last Updated:** 12/19/07

**NPI Contingency Plan Adoption Statement:**

The Georgia Department of Community Health, the administrator of the Georgia Medicaid Program, is adopting an NPI Contingency Plan, in accordance with CMS NPI Contingency Guidance and applicable regulations. The contingency plan includes the NPI Implementation timeline for the NCPDP and each HIPAA mandated X12 transaction accepted by Georgia. Georgia Medicaid does not utilize the 278 or 820 transactions.

Providers, who are required to obtain a NPI, must report their NPI to the Georgia Medicaid Provider Enrollment Unit and must submit claims with that NPI. **After the dual submission period has ended, providers 837 (claims), 270 (eligibility), and 276 (claim status) transactions will reject (returned to the submitter/provider) if the:**

- **Transaction is submitted without a NPI**
- **Transaction is submitted with a NPI that has not been reported**
- **Transaction is submitted with an invalid NPI**

**Key Contingency Plan Dates:**

Georgia Medicaid will accept/submit the following identifiers in the HIPAA mandated transactions:

(\* indicates dual submission period)

| <b>Transactions timetable applies to:</b>     |  |   |
|---|--|---|
| <b>837 Claims/Encounters (all except CMO)</b> |  |   |
| <b>270/271 Eligibility Inquiry/Response</b>   |  |   |
| <b>Dates</b>                                  | <b>Primary Identifier in all applicable provider loops</b> | <b>Secondary Identifier in all provider loops if applicable</b> |
| Thru 1/31/2008                                | Legacy ID  | Legacy ID   |
| Thru 1/31/2008 *                              | NPI  | Legacy ID   |
| Effective 2/1/2008                            | NPI  | Tax ID  |

| <b>Transaction timetable applies to:</b> |  |   |
|--|--|---|
| <b>837 CMO Encounters</b>                |  |   |
| <b>Dates</b>                             | <b>Primary Identifier in all applicable provider loops</b> | <b>Secondary Identifier in all provider loops if applicable</b> |
| Thru 5/22/2008                           | Legacy ID  | Legacy ID   |
| Thru 5/22/2008 *                         | NPI  | Legacy ID   |
| Effective 5/23/2008                      | NPI  | Tax ID  |

| <b>Transaction timetable applies to:</b><br><b>834 Benefit Enrollment/ Maintenance</b> |  |   |
|--|--|---|
| <b>Dates</b>   | <b>Primary Identifier in all applicable provider loops</b> | <b>Secondary Identifier in all provider loops if applicable</b> |
| Thru 3/31/2008   | Legacy ID  | Legacy ID   |
| Thru 3/31/2008 *   | NPI  | Legacy ID   |
| Effective 4/01/2008  | NPI  | Tax ID  |

| <b>Transactions timetable applies to:</b><br><b>837 Crossover Claims</b><br><b>276/277 Claim Status Inquiry/Response</b> |  |   |
|--|--|---|
| <b>Dates</b>   | <b>Primary Identifier in all applicable provider loops</b> | <b>Secondary Identifier in all provider loops if applicable</b> |
| Thru 5/22/2008   | Legacy ID  | Legacy ID   |
| Thru 5/22/2008 *   | NPI  | Legacy ID   |
| Effective 5/23/2008  | NPI  | Tax ID  |

| <b>Transaction timetable applies to:</b><br><b>835 Remittance Advice</b> |                                  |                                      |
|--|----------------------------------|--------------------------------------|
| <b>Dates</b>   | <b>Payee Provider Identifier</b> | <b>Rendering Provider Identifier</b> |
| Thru 5/22/2008   | Legacy ID                        | Legacy ID                            |
| Thru 5/22/2008 *   | NPI                              | NPI                                  |
| Thru 5/22/2008 *   | NPI                              | Legacy ID                            |
| Thru 5/22/2008 *   | Legacy ID                        | NPI                                  |
| Effective 5/23/2008  | NPI                              | NPI                                  |
| Effective 5/23/2008  | NPI                              | Legacy ID                            |
| Effective 5/23/2008  | Tax ID                           | NPI or Legacy ID                     |

| <b>Transaction timetable applies to:</b><br><b>Pharmacy (NCPDP) Claims</b> |                                 |                               |
|--|---------------------------------|-------------------------------|
| <b>Dates</b>   | <b>Primary Identifier</b>       | <b>Prescribing Identifier</b> |
| Thru 4/30/2008   | NCPDP Number, Legacy ID, or NPI | NPI or License Number         |
| Effective 5/01/2008  | NPI                             | NPI                           |

| <b>Transactions timetable applies to:</b><br><b>All HIPAA transaction that are submitted by non covered entities or atypical providers:</b> |  |   |
|---|--|---|
| <b>Dates</b>  | <b>Primary Identifier in all applicable provider loops</b> | <b>Secondary Identifier in all provider loops if applicable</b> |
| Thru 5/22/2008  | Legacy ID  | Legacy ID   |
| Effective 5/23/2008   | Tax ID   | Legacy ID   |

## **Milestones and Timeline:**

### **By May 23, 2007**

- Developed provider, fiscal agent, internal and external communications
  - Developed/Distributed the NPI Submittal Form for Georgia Medicaid
  - Deliver communications related to NPI
  - Developed work plan
- Developed system requirements/specifications for NPI Implementation
- Enhanced system so that NPI information would be captured/edited against
  - Ticket 7669 - NPI check digit validation
  - Ticket 7744 - Collect NPIs for current providers via provider window
- Code/Deploy cross-match logic (mapping NPI to legacy ID)
  - Ticket 7523 – NPI Implementation Phase 1 – claims processing
- Dual submission period

### **Between May 24, 2007 and May 22, 2008**

- Code/Deploy changes needed to send/receive NPI compliant transactions (835, 834, 270/271, and 276-277)
  - Ticket 7819 – NPI Implementation Phase 2
- Test above transactions with vendors/clearinghouses/providers
- Transmit providers NPI information to all vendors (trading partners) via interface
- Correct Provider file errors such as address, name , taxonomy, etc (data will be used for mapping NPI to legacy ID)
- Make coding changes to the cross match logic as needed
- NPI training (internally and other impacted state agencies)
- Increase NPI collection efforts by:
  - collecting NPI at provider workshops/provider trainings
  - generating e-mails to providers who have not reported their NPI to GA Medicaid
  - visiting provider offices (high volume claim submitters only) who have not reported NPI
  - contacting providers via telephone requesting NPI
  - collecting NPI data from the NPPES registry

### **After May 23, 2008**

- Contingency Plan will end
- Full compliance period will start for all covered entities, including pharmacies and small health plans
- All transactions will be required to have the NPI as the only identifier for both Primary Providers and Secondary Providers (see exceptions)
- Legacy ID will not be allowed for Primary or Secondary Providers (see exceptions)
- Exceptions:
  - If the rendering provider (primary Provider) is not a covered entity or is an atypical provider
  - If the secondary provider is not a covered entity or is an atypical provider
  - For the 834 inbound and outbound, a legacy ID can be used as the primary or secondary identifier if the submitter or Georgia Medicaid does not have the NPI
  - For the 835, a legacy ID can be used as the primary or secondary identifier if Georgia Medicaid does not have the NPI

**Key Questions and Answers:**

|  |  |
|--|--|
| <p>What requirements does the health plan have for sharing NPIs prior to production use?</p>                                     | <p>We are sharing NPIs with our vendors (trading partners) via a provider file interface.</p>  |
| <p>When both legacy and NPI are present in the same transaction during the dual submission, which ID is used for processing?</p> | <p>The NPI is used only if it maps to the legacy number submitted; otherwise the legacy ID is used.</p>  |
| <p>How does the health plan recommend providers test transactions with NPI?</p>  | <p>Georgia Medicaid encourages all providers, clearinghouses, and trading partners to participate in the dual submission period submitting legacy ID and NPI on the same transaction. During the dual submission period if we are unable to map the NPI to the legacy number entered, the provider receives a notification asking that he/she verify that results are as expected when NPI is used. If the results are not what the provider expected then the provider should contacts GA Medicaid and provide us with the correct information or submit the correct information on the transaction (This is only being done for the 837 transactions).</p> |
| <p>What is the NPI requirement for paper claims?</p>   | <ul style="list-style-type: none"> <li>■ For UB92/UB04 <ul style="list-style-type: none"> <li>○ UB92-NPI not required (this form is no longer being accepted by Georgia Medicaid as of October 1, 2007)</li> <li>○ UB04 – Both the NPI and legacy number is required. Georgia Medicaid started accepting the UB 04 effective September 1, 2007.</li> </ul> </li> <li>■ For CMS 1500 Form <ul style="list-style-type: none"> <li>○ NPI not required, legacy ID only</li> </ul> </li> <li>■ For Universal Claim Form (Pharmacy) <ul style="list-style-type: none"> <li>○ NPI not required</li> <li>○ NPI or legacy ID can be submitted</li> </ul> </li> </ul>  |
| <p>Will claims submitted via the web require NPI?</p>  | <p>No. The provider will continue to use legacy number. The NPI information will be retrieved based on the legacy ID entered.</p>  |
| <p>Will claims submitted via WINASAP require NPI?</p>  | <p>No, if the provider is deemed atypical; otherwise yes.</p>  |