



**DEPARTMENT OF VETERANS AFFAIRS**  
**Health Administration Center**  
**PO Box 65020**  
**Denver, CO 80206-9020**

**Health Administration Center National Provider Identifier (NPI) Implementation Contingency Plan**

**Effective Date:** May 23, 2007

**Implementation Date:** May 23, 2007

**I. GENERAL INFORMATION**

- a. Background:** The Health Insurance Portability and Accountability Act (HIPAA) of 1996 required issuance of a unique national provider identifier (NPI) to each physician, supplier and other provider of health care who conducts HIPAA standard electronic (EDI) transactions. The final rule adopting the NPI as the standard unique identifier for health care providers was published on January 23, 2004 and became effective on May 23, 2005. All covered entities must be in compliance with the NPI provisions by May 23, 2007, except for small health plans, which must be in compliance by May 23, 2008.

The Department of Veterans Affairs, Health Administration Center (HAC), as the covered payer entity for the Veterans Health Administration (VHA), has been allowing transactions adopted under HIPAA to be submitted via with a variety of identifiers. They are:

- NPI Only
- NPI and Legacy combination
- Legacy Only

On April 2, 2007, the Department of Health and Human Services (DHHS) provided guidance to covered entities regarding contingency planning for the implementation of the NPI. In this guidance, it was noted that as long as the health plan is compliant, meaning that they can accept and send NPIs on electronic transactions, they may establish a contingency plan to facilitate the compliance of their trading partners.

As a compliant health plan, the Health Administration Center (HAC) is establishing a contingency plan that follows this guidance for all supported health care programs of the Veterans Health Administration. Covered programs include: Civilian Health and Medical Program for the Department of Veterans Affairs (CHAMPVA), Spina Bifida Health Care Program, Children of Women Vietnam Veterans Health Care Program and the Fee Basis Program.

- b. Policy:** For a 12 month period after May 23, 2007, the Health Administration Center will allow continued use of legacy identifiers; it will also accept 837 Health Care Claim transactions with only NPIs, and transactions with both NPI and legacy identifiers from its clearinghouse Emdeon or our Pharmacy Benefit Manager (PBM). After May 23, 2008, legacy identifiers will NOT be permitted on any inbound or outbound HIPAA electronic transactions.

All NPI numbers sent to the HAC will be reviewed for NPI accuracy including 10 digit and check digit algorithm compliance. The Tax Identification Number (TIN) must continue to be included with the entity that will receive payment in the billing or pay to provider loop information in the 837 claim transactions.

The following real time transactions, currently supported by our trading partner Emdeon™ for the HAC, will also allow the continued use of a legacy identifier or NPI only until May 23, 2008;

- 270/271 Health Care Eligibility Benefit Inquiry and Response
- 276/277 Health Care Claim Status Request and Response
- 278 Health Care Services Review Request for Review and Response

The HAC recognizes that the National Council for Prescription Drug Programs (NCPDP) format permits reporting of only one identifier for the pharmacy and will accept either the NPI or the NCPDP Number on the NCPDP format received by its Pharmacy Benefit Manager (PBM) until May 23, 2008.

In regard to the 835 Health Care Claim Payment/Advice, the following will occur until May 23, 2008:

- If a claim is submitted with an NPI as the primary identifier, the NPI will be sent on the associated 835 remittance advice, otherwise the legacy identifier or tax identification number sent will be provided.

The HAC expects that individual providers and health care institutions that do EDI business with the Department of Veterans Affairs should apply for and send their NPI in the required HIPAA electronic transactions. The HAC also recognizes that its covered entity trading partners, including hospitals, nursing homes, doctors, dentists and others, may not have the NPIs of all the required entities that are supported in the HIPAA transactions. Providers or trading partners should be able to demonstrate that diligent efforts have been made to work with their trading partners, including clearinghouses, value added networks or software vendors, to send NPI compliant HIPAA transactions.

## II. **ADDITIONAL INFORMATION**

### a. **Website:**

- Additional information regarding the HAC NPI requirements can be found at : [www.va.gov/hac](http://www.va.gov/hac)
- Additional information from CMS and to apply for your NPI can be found at: [www.cms.hhs.gov/NationalProvidentStand](http://www.cms.hhs.gov/NationalProvidentStand)