



## Coventry Health Care's NPI Contingency Plan

On April 2, 2007, CMS announced its "Contingency Plan", for NPI compliance. Specifically, the CMS plan, allows covered entities making a good faith effort to comply with the NPI regulations to continue to accept legacy provider numbers on HIPAA transactions for up to 12 months (5/23/08) without penalties or other consequences.

In response, Coventry Health Care (on behalf of its affiliate) hereby presents its NPI Contingency Plan which demonstrates our good faith efforts to comply with the NPI regulations. While Coventry is fully prepared to and capable of accepting NPIs from providers, we recognize (as did CMS) that many health care providers are still unprepared for the NPI transition. Consequently, we have established this plan to best serve our providers and business partners as they continue their progress toward full compliance. The following is Coventry's plan:

- Coventry will accept NPI only claims, NPI + Legacy ID claims, and Legacy ID only claims after 5/23/07. The requirements as they relate to primary and secondary providers are:

	<b>Primary Providers</b> (Billing; Rendering)	<b>Secondary Provider</b> (Referring, Attending, Ordering, Operating, Other)
<b>NPI Only</b>	Accepting NPI only claims as of May 23, 2007, but not required until May 23, 2008	Accepting NPI only claims as of May 23, 2007, but not required through May 23, 2008
<b>NPI + Legacy</b>	Accepting NPI + Legacy IDs currently and will continue to accept until May 23, 2008.	Accepting NPI + Legacy IDs currently and will continue to accept until May 23, 2008.
<b>Legacy ID Only</b>	Continue to accept Legacy IDs only claims after May 23, 2007, but targeting early 2008 to move away from this option.	Legacy IDs only will continue to be accepted through May 23, 2008.

(Note: for the definition of Primary and Secondary Providers see CMS FQ 6926.)

- Coventry requires that providers update their NPI information by contacting their affiliated provider relations or provider network office. See the Coventry websites for an NPI fax form.
- Coventry will continue to require Tax ID numbers as specified by the tax laws.
- Coventry has fully tested and implemented our electronic inbound claims transactions with NPIs along with existing identifiers when supplied in dual usage and for NPI only claims. We do not require providers to conduct specific testing with us; however, providers might need to work with their trading partners to establish the process for their NPIs to be accepted by their trading partners. To ensure that submissions and receipts are working correctly, providers should begin by submitting only a small file of claims with NPIs in order to monitor for transmission and return.
- Coventry currently accepts both the new CMS 1500 form and the new UB04 form. We will continue to accept the old forms until further notice.
- Coventry plans to continue this direction through the period of contingency for NPI compliance as a good faith effort to achieve compliance for up to the 12 month extension of 5/23/08. We will continue to monitor any need to alter this date due to any state or product regulations.
- Coventry is targeting activation of returning NPIs on remittance advices, both electronic and paper. We are monitoring use of NPIs on claims and provider readiness with anticipation of a 3rd Quarter 2007 activation date.

The terms of this Contingency Plan are subject to change per the regulations. Coventry will attempt to provide advanced notice as available.