

ADVISORY NO. 426
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TOPIC: NPI NUMBERS

Beginning on May 23, 2008, all health care providers eligible for a National Provider Identifier Number must include their NPI number on workers' compensation medical bills submitted on paper or electronically. This requirement applies to all medical bills submitted (meaning "sent/mailed/emailed/faxed") on or after May 23, 2008, regardless of the date of service.

The DWC notice below raises, but does not answer the question of whether a bill that lacks the NPI can be returned as incomplete. The answer is, "Probably."

Rule 133.2(2) defines a complete medical bill as: "A medical bill that contains all required fields as set forth in the billing instructions for the appropriate form specified in §133.10 of this chapter (relating to Required Billing Forms), or as specified for electronic medical bills in Chapter 135 of this title (relating to Electronic Medical Billing, Reimbursement, and Documentation)." Accordingly, if the health care provider is eligible for an NPI and fails to include its NPI on the data elements where it is required or situational (and the situation is met), the insurance carrier may determine that the bill is not a complete claim and return the bill.

But, there is a big "If". The bill could be returned, but only if the carrier is unable to complete the missing data elements as described in Rule 133.200(a)(2)(A). So, if the carrier has access to the NPI data, it may complete the bill. And there is also a "However". However, the Division also recognizes that if providers are not made to obtain and use an NPI, then there is no real impetus for them to do so. It appears the Division is open to allowing the return of a bill as incomplete when the NPI is required and is left off, but suggests that the providers be given a reasonable period of time to implement the requirement.

Also note that the NPI may be missing in one field, but contained in another; thereby, complying with the requirement. For instance, the billing provider NPI (field 33a) on the CMS-1500 may be blank because the billing agent is not eligible for an NPI; but if the rendering provider NPI is populated (field 24j2), the bill would be considered a complete claim.