

HIPAA SUMMIT

**Shared HIT/HIPAA Issues:
The National Provider
Identifier – NPI and the
Electronic File Interchange**

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Talking Points

- EFI Within NPI Decision Framework
- High Level Principles
- EFI Process Overview
- EFI Organization Business Decisions
- Business Case Example – NCPDP
- EFI Organization Unresolved Issues/Concerns

EFI Within NPI Decision Framework - Overall Impacts

- Huge impacts for organizations
 - Changes reimbursement
 - Changes billing systems
 - Changes all internal systems that identify providers.
- Short government mandated timeframes.
- Essential groundwork for Health Information Technology (HIT) initiatives

EFI Within NPI Decision Framework – Core Questions

- How will you enumerate your organization?.
- How will you capture, validate and enter into your system NPI's from associated individual providers?
- How will you map or crosswalk multiple legacy ID's to single NPI's? (*and single legacy Id's to multiple NPI's*)
- How will you exchange NPI's and corresponding legacy ID's with trading partners?

High Level Principles

- The EFI process must not be more burdensome than the paper or web application process.
- The relationship is between the EFIO and the Provider, therefore the processes that occur between the EFIO and the Provider is not within the purview of CMS and the Enumerator.
- All submitted records are returned in a finalized state one time only, for resolution and resubmission if necessary by the EFIO.

High Level Principles

- Basic EDI batch processes must be followed as this is not a user interface or interactive application.
- The processes as included in the Enumerator RFP must be adhered to.

EFI Process Overview

- Authorization and Certification of EFIO
- Authorization and Collection of Data
- Data Submission Process
- Data Response Process
- Follow Up Processes

Authorization and Certification

- Authorization from providers is given to one EFI Organization (EFIO) to enumerate on their behalf
- EFIO registers with the Enumerator by mailing or faxing the forms
- Certification includes that EFIO:
 - Has written legal authority to act on provider's behalf
 - Is submitting current data (within past 12 months)
 - Will adhere to communication time frames and documentation specifications
- EFIO receives certification confirmation from enumerator allowing them to bulk enumerate

Authorization and Collection of Data

- EFIO obtains authorization from providers
- EFIO determines which provider records need updated (> 12 months since verified)
- EFIO gathers updated provider data
- EFIO compiles all provider data

Data Submission Process

- EFIO formats data
 - XML
 - X12 274 X253 004050
 - Excel spreadsheet (future enhancement)
- EFIO transmits data file to Enumerator
- Enumerator receives data file and inputs to NPPES for processing

Data Response Process

- Enumerator returns data file with outcome of application/update request to EFIO
- Issued NPIs returned
- Non-processable & denied applications returned with status & reason codes
- EFI Organization notifies providers of outcome, i.e. NPI issued, additional information needed, etc.

Follow Up Processes

- Enumerator contacts EFI Organization for additional information
 - Workgroup recommendation:
 - Return pended applications to EFI Organization with status code indicating pend reason
- Correction is made and data provided to enumerator

EFIO Business Decisions/ROI Value

- Centralizes process
- Provides audit trail
- Reduces application errors that occur via manual on-line entry
- Eliminates necessity for multiple web sign-ins
- Provides opportunity to automate tracking of NPI assignment

EFIO Business Decisions/ROI Value

- Provides opportunity to review and update provider master files/databases
- Potential to enumerate affiliated providers when NPI is needed for claims submission (Facility Provider EFIOs)

EFIO Business Decisions/ROI Value

- Facilitates cross walking NPIs to legacy IDs, and subsequently dual ID strategy
- Facilitates collaboration with industry partners
 - EFIO disseminates NPI to industry partners
 - Eliminates industry partners having to conduct NPI validation

EFIO Business Decisions/ROI Value

- Allows ability to capture ancillary providers that may not apply for NPI initially, but whose NPI may be needed for other HIT initiatives – CPOE, e-Prescribing, EMR/EHR implementations, etc.
- Conducted regionally, may provide current maintained database for other uses – regional credentialing, emergency preparedness

EFIO Business Decisions/ROI Value

- ROI Unknowns Due to Recent Proposed Certification and Authorization Requirements
 - Administrative time savings
 - FTE cost savings

EFIO Business Case Example

- National Council for Prescription Drug Programs (NCPDP)
 - Estimates 70,000+ Pharmacy Providers to enumerate (with commitments nearing 50K)
 - Current enumerator for Pharmacy industry
 - Data available to provide cross walk for the Pharmacy industry

EFIO Business Case Example

- Large Academic Medical Center
 - Multiple facility campuses operating as distinct sites
 - Personal on-site enumerate each campus individually
 - Professional Physician Association
 - ~2,500 Physicians + allied health professionals
 - Contracted by the academic medical center
 - Bulk enumerate out of one central location

EFIO Business Case Example

- Multi-Hospital System with Managed Care plan
 - Approx 1,000 Physicians on staff
 - Approx. 5,000 Physicians contracted
 - EFI to Enumerate Staff and Contracted Physicians
 - Cleanse existing databases and reconcile before Enumeration
 - Crosswalk legacy and proprietary Id's to NPI
 - Prepare existing databases.
 - Valid NPI's into systems
 - NPI/Legacy Crosswalks
 - Mitigate cash flow risks delays at deadlines

EFIO Outstanding Issues

- EFIO Certification Requirements
- EFIO Provider Notification Methodology Formats
- Provider Authorization Documentation Requirements
- Data Elements Returnable When Apparent Duplicate Submitted

EFIO Outstanding Issues

- Ability to Submit Files with Multiple Record Types (new, update, deactivate)
- NPPES File Volume Capabilities
- Data Discrepancy Resolution by EFIO Instead of Enumerator
- Files Returned One Time Only with All Records

EFIO Outstanding Issues

- Detail on Applications Not Processed (Pended) or Denied When Returned to EFIO
- Processing of Records Through Entire Set of Edits, Returning All Errors, not Just First Error
- EFIO Internal Business Organization Impacts
- Technical Specification and Processing Clarifications

Contact Information

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