

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Medicare & Medicaid Services



News Flash – Medicare is denying an increasing number of claims, because providers are not identifying, nor sending to, the correct primary payer prior to claims submission. Medicare would like to remind providers, physicians, and suppliers that they have the responsibility to bill correctly and to ensure claims are submitted to the appropriate primary payer. Please refer to the "[Medicare Secondary Payer \(MSP\) Manual, Chapters 1, 3 and 5](#)," and [MLN Matters® Article SE1217](#) for additional guidance.

MLN Matters® Number: MM7862

Related Change Request (CR) #: CR 7862

Related CR Release Date: June 22, 2012

Effective Date: September 24, 2012

Related CR Transmittal #: R2489CP

Implementation Date: September 24, 2012

Attending Provider Identifiers on Religious Nonmedical Health Care Institution (RNHCI) Claims

Note: This article was revised to add a reference to MLN Matters® article MM8186, which is available at <http://www.cms.gov/outreach-and-education/medicare-learning-network-mln/mlnmattersarticles/downloads/MM8186.pdf>, to alert RNHCIs to the UB-04 claim form and code set changes. All other information remains the same.

Provider Types Affected

This MLN Matters® Article is intended for RNHCIs billing their Medicare Administrative Contractor (MAC) for services provided to Medicare beneficiaries.

What You Need to Know

This article is based on Change Request (CR) 7862 which revises the instructions for reporting the attending provider on RNHCI claims and instructs RNHCIs to report their director of nursing National Provider Identifier (NPI) as the Attending Provider on claims. The current requirement to repeat the facility's NPI is not compliant with the 5010 standard that the NPI be for a person, not a facility.

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Background

Health care providers, including RNHCI, have been required to use the NPI on electronic Medicare claim transactions since May 23, 2008. Medicare billing instructions have historically required RNHCI claims to report the RNHCI's own NPI but have not required RNHCI's to report an attending physician NPI. Due to the non-medical nature of RNHCI services, beneficiaries electing the RNHCI benefit do not have an attending physician.

The 837 Institutional claim format requires an attending provider name and NPI be reported in the 2310A loop, NM1 segment for all claims that contain services other than unscheduled transportation. If RNHCI's do not report this segment, their claims will be rejected by HIPAA-compliant translator edits.

In 2011, CMS issued CR 7542, which instructed RNHCI's billing Original Medicare to report their own facility NPI in this segment to satisfy the requirement. However, since that time, CMS has learned that other payers are not accepting claims submitted using the RNHCI facility NPI in this segment. The segment requires the provider to report the NPI of a person. The qualifier for a non-person entity is not allowed. This CR 7862 provides RNHCI's with an alternative method to satisfy the requirement.

Key Point

RNHCI's submitting claims to Original Medicare should report the name and NPI of their director of nursing in the Attending Provider fields on all claims.

Additional Information

The official instruction, CR 7862, issued to your Medicare MAC regarding this change may be viewed at <http://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/Downloads/R2489CP.pdf> on the CMS website.

If you have any questions, please contact your MAC at their toll-free number, which may be found at <http://www.cms.gov/Research-Statistics-Data-and-Systems/Monitoring-Programs/provider-compliance-interactive-map/index.html> on the CMS website.

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