

**Special Interest Articles:**

- HIPAA Contingency Planning
- How to Work Towards Compliance

**September 2003**

HIPAA Contingency Planning	1
Guidance on Compliance	1
How to Work Towards Compliance	2
Additional Resources	2

## HIPAA Contingency Planning

UnitedHealthcare is working closely with Health and Human Services, the National Committee of Vital Statistics (NCVS), WEDI and Data Standards Maintenance Organizations to implement contingency plans for the October 16, 2003 deadline for covered entities.

Following the October 16<sup>th</sup> deadline, covered entities may not conduct

noncompliant transactions.

The Centers for Medicare and Medicaid Services (CMS) are responsible for enforcing the electronic transactions and code sets provisions of the law.

***UnitedHealthcare has put a contingency plan in place to assist covered entities in a number of ways to move towards compliance for the short-term.***

**UnitedHealthcare will:**

- Continue to accept the HIPAA standard claim transactions.
- Temporarily accept NSF, UB92, or ASC/X12 final rule version formats (Institutional 004010X096 and Professional 004010X098) for existing submitters, until the submitter is able to create the standard format.

*Continued on p. 2*

## Guidance on Compliance

The Centers for Medicare and Medicaid Services (CMS) are responsible for enforcing the electronic transactions and code sets provisions of the law.

CMS will focus on voluntary compliance and use a complaint-driven approach for enforcement of HIPAA's electronic transactions and code sets provisions. When CMS receives a complaint about a covered entity, written notification will be sent to the entity. CMS will allow the entity to demonstrate compliance,

document its good faith efforts to comply with the standards, and or submit a corrective action plan.

Covered entities will be given an opportunity to demonstrate to CMS that they submitted compliant transactions.

CMS understands that some transactions may require the participation of two covered entities and that noncompliance by one covered entity may put the second entity in a difficult position.

Therefore, during the

period immediately following the compliance date, CMS intends to look at both covered entities' good faith efforts to come into compliance with the standards on a case-by-case basis.

HSS encourages health plans and providers to work diligently towards achieving transaction and code set compliance.

For a complete copy of the CMS Guidance, please see the web site address on page 2.

**Contact**

**UnitedHealthcare  
about conducting  
your transactions  
electronically at:  
1.866.UHC.FAST  
or 1.866.842.3278**

## HIPAA Contingency Planning continued

- Extend testing of standard transactions beyond October 2003 when requested by the submitter.
- Accept X12-syntactically correct standard transactions for processing.
- Accept standard transactions for processing using a reduced set of content edits.
- Reject transactions that cannot be completely adjudicated because of missing data content.
- Provide HIPAA edit error reporting of test data when requested.
- Provide technical assistance when requested.
- Send out only ANSI X12 4010A1 for electronic remittances.
- Paper claims are not preferred, and are at risk for delayed adjudication.

## How to work towards Compliance

You will need to determine if your software is ready for HIPAA and if necessary, consult with your practice management software vendors (or billing or clearinghouse) to assess the transactions you conduct on paper and those that you conduct electronically.

HIPAA may require additional data and some

current data fields may no longer be required.

Be sure to contact payers and health plans you bill frequently to verify that they will be able to receive a claim you submit with your updated software.

To start electronic claims submissions, call **UnitedHealthcare at 1-866-UHC-FAST or 1-866-842-3278.**

We encourage you to submit your claims electronically to UnitedHealthcare

All electronic claims and encounters should be submitted to our **single payer ID number 87726.**

## Additional Resources

Email your questions to [askhipaa@cms.hhs.gov](mailto:askhipaa@cms.hhs.gov) or call the **CMS HIPAA Hotline 1-866-282-0659.**

**Uniprise HIPAA Web Site:** <http://www.uniprise.com/>

**Log onto the CMS HIPAA Web Pages:**

<http://www.cms.gov/hipaa/hipaa2/education/readinesschk1st.pdf>  
<http://www.cms.gov/hipaa/hipaa2/education/infoserie/>

**Sign up to learn about the latest CMS Administrative Simplification outreach materials and events:** <http://list.nih.gov/archives/hipaa-outreach-l.html>

**Sign up for the HIPAA Regulations ListServe for free email notification:**  
<http://www.cms.hhs.gov/hipaa/hipaa2/regulations/lstnotify.asp>

**Find out about your local SNIP at:**

<http://www.wedi.org/snip/>

**HHS Administrative Simplification in the Health Care Industry:**

<http://aspe.hhs.gov.admnsimp>

Complete Guide to the CMS  
Guidance on Transaction  
and Code Set Compliance  
to:

[www.cms.hhs.gov/hipaa/hipaa2/guidance-final.pdf](http://www.cms.hhs.gov/hipaa/hipaa2/guidance-final.pdf)