



Single-Source Solution  
for Workers' Compensation

## Governmental Affairs Alert

February 6, 2008

### New Texas Clean Claims Guidelines – NPI

On January 11<sup>th</sup>, the Texas Division of Workers' Compensation (TDWC) published revised and adopted Clean Claim and Billing Companion Guidelines. This information acts as a guideline for proper formatting and billing of workers' compensation claims in Texas for both paper bills and now eBilling or electronic bills. The revised guidelines now include instructions for utilization of NPI numbers in lieu of a provider's state license or DEA number, and a pharmacy's NCPDP/NABP number. In late 2006, TDWC proposed revised clean claim guidelines which included NPI requirements, which were later retracted due to the postponement of NPI roll-out by CMS. Now that CMS's NPI roll-out is near completion (May 2008), **TDWC has reinserted NPI data element requirements, which will be effective for Texas claims on 5-23-08.**

These changes impact both current paper and electronic billing in addition to the future development of eBilling and Universal Eligibility (UE) platforms. Required format changes for paper billing are contained in Chapter 2, while changes to the 837 (pharmacy and DME) and NCPDP 5.1 (pharmacy) are contained in Chapters 6, 7 and 8.

Regulatory enforcement of reimbursement and billing practices can be found in Chapter 133 TAC. The TDWC Clean Claim guidelines did not alter the state's rules on reimbursement of billing practices. Historically, TDWC allows the marketplace to enforce proper billing requirements via carrier and provider self-compliance, or through State Reporting edits. Current discussions with TDWC State Reporting staff indicate they have not engaged NPI as a required data element under state reporting edits, but may do so in the near future.

There are three areas that all providers and payors may need to address quickly in relation to the 5-23-08 Clean Claim deadline.

- The necessity of system changes to ensure compliance for paper bills such as the CMS-1500, the TDWC-66, the UB-04 or any proprietary alternate paper billing forms.
- The necessity of system changes to ensure compliance for ongoing eBilling such as the NCPDP 5.1 for pharmacy or the 837 for pharmacy and medical services.
- Finally, payors and providers currently developing eBilling platforms will need to ensure necessary modifications to the NCPDP 5.1 and 837 File Formats are made for eventual eBilling platform compliance.

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Currently, PMSI engages in both paper and electronic billing formats in Texas. In addition, PMSI is developing an eBilling and UE platform across all lines of business. PMSI Government Affairs is working with the impacted business units, including our billing department to quickly move forward with all necessary billing changes to ensure that **all** PMSI bills will be compliant with the Texas requirements on or before 5-23-08. Further, PMSI Government Affairs is working with our eBilling and UE Task Force to encapsulate the necessary compliance requirements into our eBilling program development. If you need further detail regarding the changes, please feel free to contact our Billing or Government Affairs Departments, or check the TDWC website at: <http://www.tdi.state.tx.us/wc/ebill/index.html>.

For more information, please contact Kevin Tribout, Director of Government Affairs, PMSI at [Kevin.Tribout@pmsionline.com](mailto:Kevin.Tribout@pmsionline.com) or 813.318.6876

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