The National Provider Identifier (NPI) REQUIREMENT
Information for IHS & Tribal Health Providers

NATIONAL PROVIDER IDENTIFIER

Provisions of the *Health Insurance Portability and Accountability Act of 1996 (HIPAA)* mandated the adoption of standard unique identifiers for health care providers and health plans. The purpose of these provisions is to improve the efficiency and effectiveness of the electronic transmission of health information. The Centers for Medicare & Medicaid Services (CMS) has developed a system to assign these unique identifiers.

The NPI has been developed:
- To simplify billing for each provider by having one standard provider identifier when submitting electronic transactions to payers
- To no longer use different identifiers for contract arrangements
- To speed up coordination of benefits (COB) payments by easing communication among payers

All HIPAA covered health care providers, whether they are individuals or organizations, MUST obtain an NPI to identify themselves in HIPAA standard transactions. Standard transactions are Electronic Data Interchange (EDI) transactions that transmit health care data in standard formats that were adopted by HHS by regulation. Claims and encounter information, payment and remittance advice, and claims status and inquiry are several of the standard transactions. Once an NPI is assigned, a provider's NPI will not change regardless of job or location changes, except in certain situations such as when a provider's NPI is used fraudulently and the provider requests another NPI, or when a provider ceases to exist.

All Individuals and Organizations who meet the definition of health care provider as described at 45 CFR 160.103 are eligible to obtain an NPI. If you are a HIPAA covered provider or if you are a health care provider/supplier who bills Medicare for your services, you need an NPI.

The NPI is a 10-digit number that will be used to identify you to your health care partners, including all payers, in all HIPAA standard transactions. The NPI will replace the identifiers you currently use in HIPAA standard transactions that you conduct with Medicare and with other health plans. You will need an NPI prior to enrolling with Medicare.

There are two types of NPI health care providers:
Type 1
- Individuals, including physicians, dentists, nurses, chiropractors, physical therapists, pharmacists and all sole proprietors.
- An individual is eligible for only one NPI.

Type 2
- Health care providers who are organizations, including physician groups, hospitals, nursing homes, home health agencies, clinics, nursing homes, residential treatment centers, laboratories, ambulance companies, group practices, suppliers of durable medical equipment, pharmacies, etc. and the corporation formed when an individual incorporates him/herself.
- Organizations must determine if they have "subparts" that need to be uniquely identified in HIPAA standard transactions with their own NPIs. A subpart is a component of an organization health care provider that furnishes health care and is not itself a separate legal entity, such as an outpatient pharmacy.

*(**Note**: If you are an individual who is a health care provider and who is incorporated, you may need to obtain an NPI for yourself (Type 1) and an NPI for your corporation or LLC (Type 2).)*

The NPI compliance date is May 23, 2007.
Obtain your NPI now.
Beginning May 23, 2007, the NPI must be used in place of UPINs and PINs.

Once you obtain your NPI and share it with your health care partners (including payers, clearing houses, vendors, and other health care providers), your partners must integrate the NPI into their systems and processes. Also, testing transactions using your NPI with your health care partners may take some time and cannot even begin until after you obtain your NPI. If you delay applying for your NPI, you risk your ability to meet the NPI compliance date and jeopardize that of your health care partners as well.

There are four ways that you can obtain your NPI.
1. Complete the on-line application at the NPPES web site; https://NPPES.cms.hhs.gov/NPPES/Welcome.do;
2. Download the paper application form at www.cms.hhs.gov/NationalProvIdentStand/ and mail it to the address on the form;
3. Download the application form from the www.trailblazerhealth.com web site. Trailblazer is the Medicare fiscal intermediary and carrier for Indian health programs; or,
4. After asking you for your permission, authorize your employer or other trusted party, such as the IHS Area Business Office Coordinators, to obtain an NPI for you.

(Regardless of how you obtain your NPI, it is important that you retain the notification document you receive from NPPES that contains your NPI. You may need to share this notification with other health care partners.)

More NPI Information is available here:
http://www.cms.hhs.gov/NationalProvIdentStand/
You can apply online or update your NPI Data here:
https://nppes.cms.hhs.gov/NPPES/StaticForward.do?forward=static.npistart

The National Provider Identifier (NPI) deadline is quickly approaching. Don't wait until May 23, 2007, to obtain NPI numbers for your providers. This will be too late. Contact (800) 465-3203 for NPI assistance.

HHS will be publishing a Notice in the Federal Register that will address public availability of NPIs and provider information. As the Notice is in clearance, CMS is not at liberty to discuss it. It should be published soon. We will post an announcement on www.cms.hhs.gov/NationalProvIdentStand/ once the Notice has been published.

NPI IMPLEMENTATION BY IHS

CMS is working with IHS to implement the NPI in RPMS by the mandatory compliance date of May 23, 2007. The IHS Office of Information Technology software release schedule for activities associated with Nation Provider Identifier is listed below:

Date: **Goal:**
1/31/2007   Release of **Kernel Patch** XU*8*1013 for file 200 NPI entry (Individual Provider Numbers)
2/23/07   Release **Kernel Patch** XU*8*1014 to enter Facility NPI & Sub Parts

In process   Develop Functionality for **Third Party Billing Software version 2.5 patch 11** to include updates to HCFA 1500, ADA FORM, 837 P, 837 I
3/20/2007   Testing of Third Party Billing software,
5/1/2007   Full Implementation of Third Party Billing software

In process   Develop Functionality for **Point Of Sale V1.0 patch 19 (POS)** NCPDP 5.1 for Pharmacy Billing
3/20/2007   Testing of POS
5/3/2007   Full Implementation of POS

In process   Develop Functionality for **Accounts Receivable V1.8 patch 1**
3/19/2007   Testing of A/R
4/6/2007   Full Implementation of A/R

For issues that relate to how to get an NPI or the training schedules associated with the use of the software contract your **IHS Area Office Business Office Coordinators** who then can coordinate with Sandra Lahi, IHS, Office of Resource Access and Partnerships, Business Office.

IMPORTANT NOTE:
Tribal Programs not participating in the IHS RPMS must ensure their individual systems are compatible with NPI to assure payment of Medicare Claims.