Standard Unique Health Identifier for Health Care Providers

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Overview

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Overview

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Final Rule

- Published January 23, 2004
- Effective May 23, 2005

Compliance Dates

- No later than May 23, 2007
  - Health care providers
  - Health plans
    - Annual receipts of greater than $5 million
  - Health care clearinghouses
- No later than May 23, 2008
  - Small health plans
    - Annual receipts of $5 million or less

Application

- Providers were able to start submitting starting May 23, 2005
- Internet application
  - SSN required

OR

- Paper application
  - SSN not required

National Provider Identifier

- 10 position numeric identifier
- Check digit in 10th position for error detection
- No intelligence about the provider
- Must be used to identify health care providers on standard electronic transactions
- May be used for any other lawful purpose

National Provider Identifier

- One NPI will be issued per individual person provider
  - Sole proprietorships included here
- Organizations may obtain NPIs for subparts of the organization based upon unique identifying data

Health Care Provider

- A provider of services as defined in section 1861(u) of the Act, 42 U.S.C. 1395x(u), a provider of medical or other health services as defined in section 1861(s) of the Act, 42 U.S.C. 1395x(s), and any other person or organization who furnishes, bills, or is paid for health care in the normal course of business

Covered Entity

- Transmits health information in electronic form in connection with the transactions named in the Transactions & Code Sets Rule, such as:
  - ☐ Health Care Claim
  - ☐ Health Care Claim Payment/Advice
  - ☐ Health Care Eligibility Benefit Inquiry and Response
  - ☐ Health Care Claim Status Request and Response

Covered Health Care Provider

- Must obtain an NPI for itself
- Must obtain an NPI for any subpart that would be a covered entity if it were a separate legal entity
- Must use the NPI to identify itself on all standard transactions
- Must disclose its NPI when requested in order to identity itself on standard transactions

Non Covered Provider

- Does not meet the definition of Health Care Provider
  - e.g. Taxi Driver

AND/OR

- Does not meet the definition of a Covered Entity
  - No electronic transactions transmitted

Health Plan Requirements

- Must use NPI to identify covered health care providers on standard transactions

- May not require providers to obtain an additional NPI if one is already assigned

- May not request additional provider identifiers in standard transactions

- May continue to issue proprietary IDs for internal use or non-standard transaction use

National Plan and Provider Enumeration System (NPPES)

- NPPES − National Provider and Plan Enumeration System

- Assigns a single, unique NPI to providers

- Collects and maintains data on NPPES about providers

- Deactivates an NPI when appropriate

National Plan and Provider Enumeration System (NPPES)

- Reactivates NPIs when appropriate,

- Will not reissue a deactivated NPI to another provider

- Assigns provider subparts an NPI when requested and identifying data is unique

Bulk Enumeration
(Electronic File Interchange – EFI)

- Electronic method of requesting enumeration for many provider entities at one time

- Facilitated by provider or authorized 3rd party entity

  - Required certification process for the submitter

- Format − XML

Bulk Enumeration
(Electronic File Interchange – EFI)

- Methodology - Batch only
- Does not follow common EDI practices for response generation
  - Full file failures – email notification only
  - File accepted
    - no immediate acknowledgement sent
    - Email notification when response file is ready
    - Response file contains a status for each record

Bulk Enumeration
(Electronic File Interchange – EFI)

- Response file possibilities
  - Record approved and NPI issued
  - Record rejected with reason
  - Record pended for Enumerator review
- Currently in pilot testing phase
- Expected industry rollout Spring 2006

Data Dissemination & Information Exchange

- **Data Dissemination**
  - ☐ Refers to process of obtaining data from NPPES
  - ☐ CMS to issue a notice in the Federal Register
    - Currently in HHS/CMS clearance process
    - Timing of notice unknown
    - Details of process, data required, data disseminated, unknown

Data Dissemination & Information Exchange

- **Information Exchange**
  - ☐ Sharing of NPIs directly between industry partners
  - ☐ Generally can be done inside existing business arrangements without need for additional certification or agreements
  - ☐ Necessary in order to conduct business using NPIs
  - ☐ Need for this method increases if Data Dissemination is limited

Workgroup for Electronic Data Interchange (WEDI)

- **HIPAA 1996 Public Law 104-191**
  - **Named WEDI as one of the organizations that must be consulted during standards development, adoption, and modification**
- **National Committee on Vital and Health Statistics (NCVHS) recommends to HHS standards for adoption**
- **WEDI has taken on the role, embraced by HHS and NCVHS of providing implementation recommendations and guidance to the industry**

Workgroup for Electronic Data Interchange (WEDI)

- National Provider Identifier Outreach Initiative
  - □ Purpose is to serve as the focal point to the industry for information related to the planning, transition and implementation of the NPI
  - □ Outreach plan targeted to providers, payers, clearinghouses, vendors, and other industry participants affected by the new NPI

Workgroup for Electronic Data Interchange (WEDI)

- **National Provider Identifier Outreach Initiative**
  - Roles
    - Develop and implement a national coordinated NPI outreach plan
    - Act as a central repository for NPI resources
    - Disseminate industry consensus information on policy and operational issues regarding the deployment and use of the NPI

Workgroup for Electronic Data Interchange (WEDI)

- National Provider Identifier Outreach Initiative
  - Partnering with
    - CMS
    - WEDI SNIP
    - Payers, Providers, and Vendors
    - Standard Development Organizations
    - Data Content Committees

Workgroup for Electronic Data Interchange (WEDI)

- National Provider Identifier Policy Advisory Group (NPI PAG)
  - Convened June 2004
  - WEDI Board issued recommendations to HHS September 2004
  - HHS responded 2nd Qtr 2005
  - 2nd PAG convened November 2004
    - No formal recommendations issued to HHS
    - Industry collaboration recommended to WEDI membership

References

- WEDI NPIOI Site
  http://www.wedi.org/npioi/

- Final Rule
  http://aspe.hhs.gov/admnsimp/index.shtml

- CMS NPI Site
  http://www.cms.hhs.gov/NationalProvIdentStand/

Questions

after the Compliance Methodologies portion

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