Informational Memo

Effective January 1, 2013:
HealthCare Providers Required to Use NPI Numbers on all Claim Transaction Types

ODP Communication Number: Memo 001-13

The mission of the Office of Developmental Programs is to support Pennsylvanians with developmental disabilities to achieve greater independence, choice and opportunity in their lives.

AUDIENCE: Direct Service Health Care Providers

PURPOSE: This Office of Developmental Programs (ODP) informational memo is intended to communicate to ODP direct service health care providers who participate in the Medical Assistance Program, that effective January 1, 2013, all healthcare providers will be required to include their National Provider Identifier (NPI) on all claim transaction types. Atypical providers are exempt from the NPI number requirement.

BACKGROUND

Pennsylvania Medical Assistance (MA) program issued Bulletin 99-07-07, on May 18, 2007. This bulletin contained instructions to health care providers for using their National Provider Identifier (NPI) number when performing Health Insurance Portability and Accountability Act of 1996 (HIPAA) standard compliant transactions with the Department of Public Welfare (DPW). Electronic health care billing is considered a HIPAA standard compliant transaction.

Effective May 23, 2008, the federal Department of Health and Human Services (HHS) required providers to submit all electronic healthcare claims with NPI numbers included in them. This requirement applied to electronic transactions (i.e. 837/ NCPDP) only and did not include paper or internet claims submitted to DPW.

DPW is updating procedures for the reporting of NPI when submitting Medicaid health care claims. For claims submitted January 1, 2013, and forward, DPW will require paper claims, internet claim submissions, and electronic transactions to include an NPI number.
DISCUSSION

Medical Assistance (MA) Bulletin # 99-12-14, entitled “NPI Requirements on All Claim Submission Media”, was issued on December 19, 2012. The purpose of this MA Bulletin is to announce to providers that the Pennsylvania Department of Public Welfare is updating procedures for the reporting of NPI when submitting Medicaid health care claims as mandated by the Patient Protection and Affordable Care Act (ACA) of 2010. This ODP communication explains the impact areas that apply to ODP providers.

The definition of a health care provider is defined under HIPAA in Federal regulations 45 CFR § 160.103. According to this act, the term health care is defined as “care, services, or supplies related to the health of an individual. Health care includes, but is not limited to, the following:

(1) Preventive, diagnostic, therapeutic, rehabilitative, maintenance, or palliative care, and counseling, service, assessment, or procedure with respect to the physical or mental condition, or functional status, of an individual or that affects the structure or function of the body; and

(2) Sale or dispensing of a drug, device, equipment, or other item in accordance with a prescription.”

HIPAA standard compliant transactions types include standard electronic data interchange (EDI) transactions that transmit health care data in standard formats such as claim transactions. Effective January 1, 2013, these transactions will now include internet submission (PROMISe™ Provider Internet Portal) as well as Provider Electronic Solutions (PES) software (batch transactions), billing software developed by a vendor for the provider’s use and paper submissions (CMS-1500).

Providers who do not render health care services are called atypical providers. Examples of atypical services include taxi services, home and vehicle modifications, and respite services. Atypical providers may submit HIPAA transactions, but they do not meet the HIPAA definition of a health care provider and should not obtain an NPI number or bill using an NPI number.

BILLING

! NOTE: BILLING RULES REGARDING THE 9-DIGIT MPI # AND 4-DIGIT SERVICE LOCATION CODE HAVE NOT CHANGED.

Original Claim Submissions: Healthcare providers should ensure they include an NPI number on all electronic claims, internet claims and paper claims for claims billed January 1, 2013 and forward. In addition to the billing provider, this requirement also applies to the rendering

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1 Federal regulations 45 CFR § 160.103
provider. Effective January 1, 2013, if an MPI number is found in the NPI field, the entire claim will deny. Both the 9-digit MPI and 4-digit service location code and NPI numbers for the rendering and billing provider should be included on all claim submission media types.

Adjustments or Voids: Beginning January 1, 2013, claim adjustments and voids will require an NPI that is registered in PROMIs™ to be entered on the transaction even if the original claim was paid prior to the January 1, 2013, implementation date. If the NPI is missing from an adjustment or void and PROMIs™ recognizes the submitting entity as a health care provider, the claim(s) will deny. In other words, if an adjustment is made to an original claim beginning January 1, 2013, the rendering provider field must have an NPI number in it or the claim will deny. Both the 9-digit MPI and 4-digit service location code and NPI numbers for the rendering and billing provider should be included on all claim adjustments and void submission media types.

Internet Claims. Providers who are enrolled with DPW can use the PROMIs™ Provider Internet Portal to perform a number of functions and transactions including submitting health care claims. Beginning with claims received on January 1, 2013, the following reporting and processing changes will be in effect for certain provider fields.

- Billing providers who submit health care claims using the PROMIs™ Provider Internet Portal will continue to log into the portal using their 9-digit MPI # and 4-digit service location code. When the billing provider attempts to submit a health care claim, the PROMIs™ Provider Internet Portal will check to see if the billing provider has an NPI that is registered with the Department. If the billing provider’s NPI is registered with the Department then the claim submission option will be available. If the provider does not have an NPI that is registered with the Department, then the provider will not be able to submit the health care claim. The provider will receive a message with instructions on how to obtain an NPI and register it with the Department.

- All rendering provider’s 9-digit MPI and 4-digit service location code and NPI numbers are required to be registered with the Department and are to be reported on all professional health care claims, regardless of claim type. If the billing provider does not enter the rendering provider’s NPI and 9-digit MPI number and 4-digit service location code on the internet claim using either the claims inquiry or claims submission windows, the billing provider will not be able to submit the claim and a message will be displayed stating that the NPI is missing. If the rendering provider’s NPI number is included on the claim and PROMIs™ determines the NPI is not registered with the Department, the billing provider will receive a message explaining that the NPI is not registered and the claim will deny.

See the following page for services this new requirement applies to.
This new requirement applies to ODP healthcare providers which include the following provider types, specialties and services:

<table>
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<tr>
<th>Provider Type</th>
<th>Provider Type Description</th>
<th>Specialty</th>
<th>Specialty Description</th>
<th>Procedure Codes/Services</th>
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<td>160</td>
<td>Nursing Service - RN</td>
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<td>17</td>
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<td>Psychologist</td>
<td>208</td>
<td>Behavior Therapist Consultant</td>
<td>T2025 HE, T2025 HE HQ</td>
</tr>
</tbody>
</table>

**RESOURCES**

This communication does not apply to providers who render atypical services. Click on the following hyperlink for a list of atypical provider types and specialties:


Pennsylvania NPI website:

[http://www.dpw.state.pa.us/provider/doingbusinesswithdpw/nationalprovideridentifiernpiinformation/index.htm](http://www.dpw.state.pa.us/provider/doingbusinesswithdpw/nationalprovideridentifiernpiinformation/index.htm)

Medical Assistance Provider Quick Tip #72 titled “National Provider Identifier (NPI) Requirements for Electronic Claims”:

[http://www.dpw.state.pa.us/ucmprd/groups/webcontent/documents/communication/s_002865.pdf](http://www.dpw.state.pa.us/ucmprd/groups/webcontent/documents/communication/s_002865.pdf)

All current Error Status Codes can be found at the following link:


**INQUIRIES**

For inquiries regarding this communication, contact the ODP Claims Resolution Section:

E-mail: ra-odpclaimsres@state.pa.us
Phone: 1-866-386-8880, Monday – Thursday, 8:30 am - 12:00 pm and 1:00 pm - 3:30 pm