

Medicaid in Education Alert

New York State Office of Health Insurance Programs (NYS OHIP)
New York State Education Department (NYSED)
Preschool/School Supportive Health Services Program (SSHSP)
Medicaid in Education Units

Issue #11-03

TO: All SSHSP Medicaid Providers

FROM: NYS OHIP SSHSP & NYSED
Medicaid in Education Units

DATE: September 12, 2011

SUBJECT: Medicaid National Provider Identifier (NPI) Requirements

It is a federal requirement that a National Provider Identifier (NPI) be included on all claims submitted for Medicaid reimbursement. Currently only the billing provider's NPI is required on school supportive health services claims. **Effective January 1, 2012, school supportive health service claims submitted to Medicaid for reimbursement must contain both the billing provider's NPI and the attending provider's NPI.**

The attending provider is the clinician who has overall responsibility for the student's medical care. The servicing provider is the clinician that provides services to the student on a regular basis. In cases where the servicing provider works "under the direction of" or under the supervision of a licensed clinician, the directing/supervising clinician is considered the "attending" clinician. For purposes of reporting NPI numbers on SSHSP Medicaid claims, the attending provider's NPI number must be used where the attending provider and the servicing provider are not the same individual.

NPIs for billing providers and attending providers must be registered with the New York State Medicaid program before being included on a claim. School districts, counties, and § 4201 schools are responsible for registering the NPIs of their affiliated providers with the New York State Medicaid program before January 1, 2012.

The New York State Medicaid program offers two methods for registering affiliated providers' NPIs:

- At the eMedNY website at: <https://npi.emedny.org/Facility/>
- Via a batch process by following the instructions in the Facilities Practitioner's NPI Reporting (batch reference guide) located on the NYHIPAADESK home page under NPI.

School districts, counties, and § 4201 schools with a large number of practitioners are encouraged to maintain a “roster” of their providers’ NPIs. As changes are made to the roster, please forward updated lists to the New York State Medicaid program using the batch facilities method found at:

<http://www.emedny.org/hipaa/NPI/index.html>.

Duplicate posting of practitioners’ NPIs will not create a problem. For questions and concerns regarding Facility Affiliated Practitioner NPI Reporting, please contact the eMedNY Call Center at (800) 343-9000.

Special transportation claims will not require a servicing provider NPI. Special transportation claims will continue to be submitted with only the billing provider’s NPI.

For SSHSP purposes, the billing provider is the school district, county, or § 4201 school. The attending provider is the individual who has overall responsibility for the student’s medical care and treatment. Therefore, servicing practitioners operating under the direction of or under the supervision of another practitioner must use their supervisor’s NPI (i.e., the NPI of the attending provider) on SSHSP claims. This applies to occupational and physical therapy assistants, licensed practical nurses and licensed master social workers (LMSWs), even though they may have an individual NPI.

For SSHSP purposes, beginning January 1, 2012, the following licensed, registered, and/or certified as appropriate attending providers’ NPIs must be reported on SSHSP claims:

- speech-language pathologists;
- physical therapists;
- occupational therapists;
- psychologists;
- psychiatrists;
- clinical social workers;
- registered professional nurses;
- audiologists; and,
- physicians, physician assistants, or nurse practitioners.

For SSHSP purposes, the following service providers are required to report their supervisor’s (the attending practitioner’s) NPI:

- certified teachers of the speech and hearing handicapped;
- certified teachers of students with speech and language disabilities;
- physical therapy assistants;
- occupational therapy assistants;
- licensed master social workers; and
- licensed practical nurses.

At this time, the ordering/referring provider’s NPI is not required on SSHSP claims. However, school districts, counties, and § 4201 schools are not precluded from reporting the ordering/referring provider’s NPI in addition to those of the billing and attending provider.

School districts, counties, and § 4201 schools should ensure affiliated providers have NPIs. Providers required to report an NPI should be encouraged to obtain NPIs as soon as possible. Once practitioners have NPIs, school districts, counties, and § 4201 schools must register them with the New York State Medicaid

program. Failure to complete this process prior to January 1, 2012 could result in a lag in payment or the denial of SSHSP claims.

A list of National Provider Identifier (NPI) questions and answers is attached for quick reference. Topics covered include how to obtain an NPI, where to get additional information about NPIs and how NPIs are used.

If you have any questions or comments regarding this alert, please contact your local Regional Information Center representative or the NYS Education Department, Medicaid Unit at medined@mail.nysed.gov.

National Provider Identifier (NPI) Questions and Answers

1. What is a National Provider Identifier (NPI)?

The National Provider Identifier (NPI) is a Health Insurance Portability and Accountability Act (HIPAA) Administrative Simplification Standard. The NPI is a unique identification number for covered health care providers (45 CFR 160.103). The NPI is a 10-position, intelligence-free numeric identifier (10-digit number). This means that the numbers do not carry other information about healthcare providers, such as the state in which they live or their medical specialty.

2. How do I obtain a National Provider Identifier?

The Centers for Medicare & Medicaid Services (CMS) developed the National Plan and Provider Enumeration System (NPPES) to assign the NPIs. Applications can be submitted on-line or through the mail.

The web-based application is available at <https://nppes.cms.hhs.gov/NPPES/Welcome.do>. Included on the NPPES website are the NPI Application Instructions, Information Required for Individual Providers and Information Required for Organizations.

Health care providers may wish to obtain a copy of the paper NPI Application/Update Form (CMS-10114) and mail the completed, signed application to the NPI Enumerator located in Fargo, ND, whereby staff at the NPI Enumerator will enter the application data into NPPES. (The form is available only upon request through the NPI Enumerator.) Health care providers who wish to obtain a copy of this form must contact the NPI Enumerator in any of these ways:

- Phone: 1-800-465-3203 or TTY 1-800-692-2326
- E-mail: customerservice@npienumerator.com
- Mail: NPI Enumerator
P.O. Box 6059
Fargo, ND 58108-6059

3. Do I apply for an individual or group (organization) NPI?

Each practitioner should apply for an individual NPI. Individuals should use the taxonomy code for Local Education Agency (251300000x) when applying for an individual NPI for billing the New York State Medicaid program for preschool/school supportive health services.

4. I am a provider who is affiliated with two different groups. Do I receive two NPIs?

An individual is assigned only one NPI regardless of the number of places where he/she may practice.

5. I am with an organization. Do the individual practitioners with my organization need to apply for individual (Type 1) NPIs?

If your organization contracts with school districts, counties, and § 4201 schools for services and your practitioners practice at the independent practice level (e.g., licensed and registered psychiatrists, psychologists, and therapists), the practitioners will need to obtain individual (Type 1) NPIs. Your organization will need to provide the practitioners' individual NPIs to the contracted school district(s), counties, and § 4201 schools for their use on Medicaid claims for preschool and school supportive health services.

National Provider Identifier (NPI) Questions and Answers

6. I am with an organization. Do the individual practitioners with my organization need to apply for individual (Type 1) NPIs?

If your organization contracts with school districts, counties, and § 4201 schools for services and your practitioners practice at the independent practice level (e.g., licensed and registered psychiatrists, psychologists, and therapists), the practitioners will need to obtain individual (Type 1) NPIs. Your organization will need to provide the practitioners' individual NPIs to the contracted school district(s), counties, and § 4201 schools for their use on Medicaid claims for preschool and school supportive health services.

7. In general, what NPIs can be reported on Medicaid claims?

HIPAA (the Health Insurance Portability and Accountability Act) requires that covered health care providers who transmit health information in electronic form obtain and use NPIs in all standard electronic health care transactions (45 CFR Part 162). Covered health care providers include:

- Ordering provider – the provider who completes the written orders/referrals (not required for SSHSP claims at this time);
- Attending provider – the practitioner with overall responsibility for the student's care; and,
- Billing provider – the school district, county, or § 4201 school.

8. Which NPIs must be reported on Medicaid claims for the SSHSP?

Effective January 1, 2012 SSHSP claims submitted to Medicaid for reimbursement must contain both the billing provider's NPI and the attending provider's NPI. While the ordering provider's NPI is not required on SSHSP claims at this time, school districts, counties, and § 4201 schools are not precluded from reporting the ordering provider's NPI in addition to those of the billing and attending provider.

9. Who is not required to report an NPI under the School Supportive Health Services Program?

Some servicing providers are not required to report an NPI for SSHSP purposes. These include:

- Certified teachers of the speech and hearing handicapped (TSHH);
- Certified teachers of students with speech and language disabilities (TSSLD);
- Certified physical therapy assistants (PTA);
- Certified occupational therapy assistants (OTA);
- Licensed master social workers (LMSW);
- Licensed practical nurses (LPN); and,
- Non-emergency transportation providers.

10. How do I bill if the servicing provider does not have an NPI (e.g., TSHH, TSSLD, or a non-emergency transportation provider)?

- If the servicing provider is a **TSHH, TSSLD, OTA, PTA, LMSW, or LPN**, the supervising (attending) provider's NPI is included on the Medicaid claim.
- If the servicing provider is a **non-emergency transportation provider**, an NPI is not required on the Medicaid claim. The billing provider's NPI on the claim will be sufficient for Medicaid reimbursement.

National Provider Identifier (NPI) Questions and Answers

11. How will New York State use my NPI?

New York State uses providers' NPIs for many purposes other than the transmission of confidential health care information. Some of these purposes include:

- Validating a provider's license/registration;
- Verifying the relationship with the billing provider;
- Editing against the Excluded Provider List; and,
- Auditing purposes under the Office of the Medicaid Inspector General.

12. Where can I obtain additional information about NPIs?

Additional information on the NPI is available from CMS at <http://www.cms.hhs.gov/NationalProvIdentStand> or you may call the CMS HIPAA hot line at 1-800-465-3203.