The National Provider Identifier (NPI): What Dentists Need to Know
The information provided in this presentation is for educational and informational purposes only and should not be interpreted as legal advice. Dentists are encouraged to seek their own legal advice regarding the application of the National Provider Identifier Rule to their practices and circumstances.
What this Presentation Covers

- What is the National Provider Identifier (NPI)?
- Are you required to obtain and use an NPI?
- How do you apply for and receive an NPI?
- Is there more than one type of NPI?
- What should you do with your NPI once you receive it?
- Can you start to use your NPI?
- Some frequently asked questions about the NPI
What is the National Provider Identifier (NPI)?
The National Provider Identifier (NPI) is part of the administrative simplification requirements established by the Health Insurance Portability and Accountability Act (HIPAA). Its purpose was:

- "To improve…the efficiency and effectiveness of the healthcare system through the establishment of standards and requirements for the electronic transmission of certain health information."

- "To protect the security and privacy of health care information by setting standards.”
Do You Remember HIPAA Administrative Simplification?

- HIPAA establishes standards for electronic transactions (such as claim submission), procedure codes, privacy, security and certain identifiers, including the NPI.
What is the NPI?

- The NPI is a unique identifier for each health care provider to use for electronic transactions, including claim submissions.

- The NPI is intended to eliminate the need to use different identifiers when sending electronic transactions to different payers.

- The NPI will replace all your previous identifiers used for electronic transactions such as:
  - Unique identification numbers assigned by insurance companies and other payers
  - Medicare and Medicaid identification numbers
  - CHAMPUS and UPIN identifiers

- By eliminating multiple identifiers, the NPI will simplify transactions, such as claim submissions and coordination of benefits.
What is the NPI?

- NPIs are assigned by the federal government through the National Plan and Provider Enumeration System (NPPES), which is managed by a private company.

- NPIs are 10-digit numbers that are unique to each covered health care provider and health care organization.

- NPIs are randomly assigned, and contain no information about the health care provider in the number itself.

- NPIs are permanent and do not expire or change if you move.
What are the Benefits of the NPI?

The NPI has several benefits:

- You will have one unique identifier for all dental plans and other payers to utilize for claims processing and other transactions.

- Your NPI is permanent and will not change if your relocate your practice or change specialties.

- Using the NPI may result in more efficient coordination of benefits.

- Using an NPI will make it easier for dental plans and other payers to track transactions and avoid duplication.

- NPIs can also be used on paper transactions, completely eliminating the need for you to maintain multiple identifiers.
What does the NPI not do?

- Having an NPI does **not**:
  - Guarantee reimbursement by dental plans or other payers
  - Require you to participate with any dental plan or any other payer
  - Require you to conduct electronic transactions

- The NPI will **not** replace numbers used for purposes **other than** general identification, such as your:
  - Social Security number
  - DEA number
  - Taxpayer ID number
  - State license number
  - Specialty number
When is the NPI rule effective?

- You can apply for and receive your NPI now, but not all dental plans, other payers and clearinghouses are ready to use them.

- Everyone covered by the NPI rule (called “covered entities” – more about this later) must begin using the NPI in standard electronic transactions by:
  - May 23, 2007 - except “small” health plans
  - May 23, 2008 - “small” health plans

- A “small” health plan is one with less than $5 million dollars in annual revenue. The health or dental plan can tell you if they meet this definition.

- By these dates, covered entities must use only the NPI to identify providers in standard electronic transactions.
Are you required to obtain and use an NPI?
Do you need an NPI?

- All individual health care providers (including dentists) and organizations such as clinics and group practices are eligible to obtain an NPI.

- However, only certain “covered entities” as defined by HIPAA are required to obtain one.

- If you answer “yes” to any one of the following questions, you are a “covered entity” and are required by federal law to obtain an NPI:
  - Have you submitted claims electronically?
  - Have you submitted claims attachments electronically?
  - Have you used the Internet to verify eligibility or check on the status of a claim?
Do you need an NPI?

- If you answered “no” to all of the questions, you should still consider obtaining an NPI. Why?
  - A single identifier eliminates the need to maintain and match identification numbers to specific payers.
  - You can relocate practices or change specialties without requiring new identifiers from multiple payers.
  - Transactions such as coordination of benefits may be simplified.
  - Some, although not all, dental plans may choose to require NPIs on all transactions, including paper.
  - You may conduct electronic claims transactions or inquiries in the future.

- Some states have passed laws or are considering laws that require the use of NPIs for all transactions, including paper claims. Your local Delta Dental Plan member company can tell you if there is such a requirement in your state.

- Keep in mind that simply getting an NPI does not make you a covered entity, nor require you to submit claims electronically.
Who can have an NPI?

- All individual health care providers and organizations such as clinics and group practices are eligible to obtain an NPI, including those who do not send electronic transactions.

- Health care providers can be:
  - Individuals, such as dentists and dental hygienists.
  - Organizations, such as group practices and clinics.
  - Organizations may also obtain NPIs for their “subparts,” such as affiliated laboratories. Subparts are not as common in dentistry as they are in other areas of health care such as hospitals.

- You may need only one type, or both types of NPI depending on your situation (more about this later).

- Entities, such as billing services, that do not qualify as a health care providers will not be eligible for a NPI.
What if I submit only paper claims?

- If you submit only paper claims, do not use electronic transactions governed by HIPAA, and do not use the Internet to inquire about claim payments or eligibility, you are **not required** to obtain an NPI.

- However, Delta Dental strongly encourages you to obtain and use an NPI to submit all of your claims once we are prepared to accept it. This will enable you to maintain only one unique identifier for use with **all** dental plans and other payers.
Once you have your NPI, you must:

- Use your NPI on all standard electronic transactions where it is required.
- Disclose your NPI to any dental plan or other payer needing it for a standard transaction.
- Communicate any changes of the information you supplied on your NPI application to the NPPES within 30 days of the change.
- Require any business associate you may work with such as a billing service to use your NPI in transactions conducted on your behalf.
How do I apply for and receive an NPI?
How do I apply for an NPI?

- Apply on the Internet
  - [https://nppes.cms.hhs.gov](https://nppes.cms.hhs.gov)

- Apply on Paper by Mail (faxes are not accepted):
  - Call 1-800-465-3203 or TTY 1-800-692-2326 or
  - Email customerservice@npienumerator.com
  - Mail application to:
    
    NPI Enumerator  
    PO Box 6059  
    Fargo, ND 58108-6059
How do I apply for an NPI?

- The Internet application takes about 20 minutes to complete.

- You will need to provide certain required information for an individual NPI and an organizational NPI. This is indicated in the instructions.

- The NPPES will:
  - Validate the data you enter for completeness
  - Ensure there are no duplicate applications
  - Send your NPI to you by mail or e-mail

- You should receive your NPI via e-mail within one to five business days if you submitted the application online.

- Mailed applications may require up to 20 days to process and you will receive your NPI via U.S. mail.
How do I apply for an NPI?

The Internet and paper applications include instructions and a list of the information you will need to provide.
What are “Taxonomy Codes?”

- When you apply for your NPI you will be asked to provide your 10-digit taxonomy code.

- These codes are not “assigned.” You select the taxonomy code(s) that most closely represents your education, license, or certification.

- For dentists, the taxonomy code is an identifier that corresponds most closely to the area of specialty.

- If you cannot locate an appropriate taxonomy code, you may provide a written description of your specialty in the space provided on the electronic or paper application, and you will be assigned the closest appropriate code.
What are “Taxonomy Codes?”

To facilitate your registration, the taxonomy codes applicable to dentists are listed below:

- General Practice - 1223G0001X
- Dental Public Health - 1223D0001X
- Endodontics - 1223E0200X
- Oral and Maxillofacial Pathology - 1223P0106X
- Oral and Maxillofacial Radiology - 1223X0008X
- Oral and Maxillofacial Surgery - 1223S0112X
- Orthodontics and Dentofacial Orthopedics - 1223X0400X
- Pediatric Dentistry - 1223P0221X
- Periodontics - 1223P0300X
- Prosthodontics - 1223P0700X
- Denturist - 122400000X
Is there more than one type of NPI?
Is there more than one type of NPI?

Yes. As discussed earlier, health care providers can be:

- Individuals, such as dentists and dental hygienists. Every individual receives a unique NPI. No two individuals can have the same NPI.

- Organizations, such as group practices and clinics.

- Organizations may also obtain NPIs for their “subparts,” such as affiliated laboratories. Subparts are not as common in dentistry as they are in other areas of health care such as hospitals.

- We’ll give you some examples to help you determine whether you need an organizational NPI or a subpart.
In addition to obtaining an individual NPI, you must determine whether or not you will need an organizational NPI. Here are some questions that may help:

- Do you bill dental plans and other payers under the name of an entity such as a group practice, professional association (P.A.) or professional corporation (P.C.)?

- Do you receive payments from dental plans and other payers under the name of a group practice, professional association (P.A.), professional corporation (P.C.), limited liability corporation (L.L.C.), or some other entity?

- Do your annual 1099 forms report payments made to you under the name of a group practice, professional association (P.A.) or professional corporation (P.C.), limited liability corporation (L.L.C.), or some other entity?

If you answered “yes” to any of the previous questions, it is likely that you need an organizational NPI to continue receiving payments in this manner.
Is there more than one type of NPI?

The following scenarios for obtaining and using NPIs are for illustration purposes, and do not necessarily reflect all possible NPI scenarios for dental practices. You must evaluate your own situation to determine the best way to set-up your NPI(s). Assistance can be obtained through the CMS NPI Website at http://www.cms.hhs.gov/NationalProvIdentStand/04_education.asp#TopOfPage.
Before applying for your NPI, you should assess all the identification numbers you currently use:

- Do some indicate service location (i.e. multiple office identifiers)?
- Do you have multiple numbers for the same dental plan or other payers (i.e. unique identifiers for group practices)?
- Are some set–up by plan or reimbursement type (i.e. a PPO plan or a dental HMO plan)?

A complete analysis and understanding of the identifiers you currently use and how they relate to your new NPI is the basis for a smooth transition.
In this example, the dental group has an organizational NPI and receives all payments under “Main St. Dental Group,” but each dentist has a unique individual NPI.
An organizational NPI may also be needed even if there is only one dentist in the practice, but payments are made to a practice name.

Main Avenue Dental Group P.C.

Organizational NPI
1234567890

Doctor A

Individual NPI
4567890123
Organizational NPI Example

More than one NPI may be needed even if there are different locations incorporated under different tax identification numbers (TINs). Individual dentists will each their own NPI.

** Each location must be be incorporated under a separate TIN.
What is a “Subpart”?

- The NPI rule also enables you to obtain separate NPIs for your “subparts.” Subparts are more common for institutions such as hospitals. They are less common for dental practices.
  - Subparts apply to organizations, not individuals
  - A subpart is not a separate legal entity, such as a separate corporation.
  - A subpart is a component(s) of the same entity that conducts its own standard transactions.

- Covered organization health providers, such as hospitals, may be made up of components (e.g., an acute care hospital with an in-house dental program) or have separate physical locations (e.g., chain pharmacies) that furnish health care, but are not themselves separate legal entities.

- For example, a multi-office provider as a subpart of an organization, may choose to apply for a separate NPI for billing purposes if it submits electronic transactions independently.
In this example, Main Street Hospital Corp. includes an internal dental practice that is not incorporated separately, but submits its own electronic transactions. The dental clinic could then obtain a subpart NPI under which it will submit transactions.
What should I do with my NPI when I receive it?

Can I start to use it?
What should I do with my NPI once I receive it?

- Not all dental plans, clearinghouses or other payers are ready to start using NPIs. They must be ready by May 23, 2007. For now, we suggest the following:

  - Each payer and clearinghouse should notify you when they are ready to begin accepting NPIs in place of other identifiers on transactions.

  - Some payers and clearinghouses will have a period of time when you will submit both your current identifier and your NPI on each transaction at the same time. This is so processing systems can be tested.

  - Some payers may ask you to provide them with your NPI, but may not be ready to use them on transactions.

  - If you are unsure, contact the professional relations or customer service departments of your payers.

- Delta Dental will provide you with specific instructions for using your NPI!
Before you start using your NPI in electronic transactions, talk to your practice management system vendor or the clearinghouse you use to submit electronic transactions. You may want to ask them the following questions:

- Will my practice management system or clearinghouse require updates to accommodate the NPI?
- Will I need to remove the numbers being replaced by the NPI?
- Is there any other impact on my practice management system resulting from the NPI?
- Will the NPI print claims generated on paper?
- When will you make these changes?
- When and how will you test these changes?

You may also want to think about the following:

- What does my office staff need to know?
- Are there changes in office procedures resulting from the NPI?
What must I do before I start using my NPI?

A Few Things to Remember:

- Do not submit your NPI on electronic transactions or paper claims until the dental plan or other payer has told you that they are ready to accept it.

- Be sure that your practice management system vendor will be ready to implement the NPI before the compliance date of May 23, 2007 to allow for testing and transition time.

- Watch for information from dental plans and other payers with which you do business on the implementation of the NPI.

- Review laws in your state from state boards and insurance regulators. Some states require the NPI to be used on paper claims. You may be able to use your NPI on paper claims, even if it is not a state requirement.

- Applying for an NPI does not replace the process of participating with a dental plan. You will continue to do this through professional relations representatives of each dental plan or other payer.
What must I do before I start using my NPI?


- Watch for correspondence from Delta Dental, other dental benefit carriers, Medicaid, Medicare, CHAMPUS, and any other programs that issue claim payments to you.
Some Frequently Asked Questions about the NPI.
Can I submit an NPI on paper claims?

Yes, you may submit your NPI on paper claims. Currently the ADA recommends using the area you currently place your current identifier or license number. In the future, a separate field for NPI may be added to the ADA form.
Will my hygienist and denturists be required to get an NPI?

This question is best answered by each individual payer. Some local Delta Plans and other payers require it, while some will not.

Will this number replace my state license number?

NO! You will still need to maintain your license number for credentialing and other license-related matters. The NPI is only used to identify providers and organizations on electronic transactions. It replaces the identifiers currently used by clearing houses and payers.
If I am an organization, which NPI do I use? Individual or organizational?

**BOTH!** Your NPI will replace current identifiers in use.

If claims are all submitted under a single license number for a dental practice, regardless of treating dentist, then you would submit your claim under the organizational NPI for that facility, and put the individual NPI in the treating dentist field.

If you have questions, it is best to contact your payer/clearing house to discuss how you should be submitting.
Does the NPI apply to Web claims?

Yes. You are required to obtain an NPI if you are utilizing a payer or clearinghouse Web site or portal to enter claims, check eligibility, check claim status or perform any of the HIPAA related transactions. Some payers will modify their login procedures to require you to use an NPI.

Payers and clearinghouses will be modifying their systems to accept the NPI and you should utilize it on all Web based transactions when asked to do so.