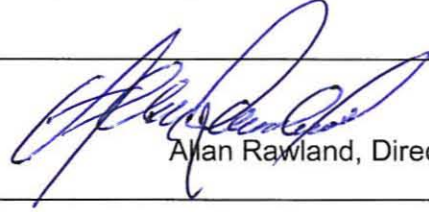


**County of San Bernardino  
Department of Behavioral Health**

## HIPAA National Provider Identifier (NPI) Policy

**Effective Date** 11/06/08  
**Approval Date** 11/06/08

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Alan Rawland, Director

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**Policy** It is the policy of the Department of Behavioral Health (DBH) to require DBH staff that are identified as health care providers, and DBH clinics that are identified as covered entities, to obtain a National Provider Identifier (NPI).

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**Purpose** To ensure all Health Insurance Portability and Accountability Act (HIPAA) covered entities obtain a NPI to identify themselves as "health care providers" in the HIPAA standard transactions that they conduct with Medicare and other covered entities.

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**State and Federal Mandate** DBH is mandated by HIPAA Administrative Simplification Standards to begin use of the NPI, in lieu of legacy provider identifiers in HIPAA standard transactions beginning May 23, 2008. The requirement for NPI applies to any entity that is a:

- health care provider that conducts certain transactions in electronic form (called here a "covered health care provider").
- health care clearinghouse.
- health plan.

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**National Provider Identifier (NPI)** The NPI is a unique identification number for covered health care providers. Covered health care providers, all health plans and health care clearinghouses will use the NPI in administrative and financial transactions adopted under HIPAA. 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.

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**Required Health Care Providers** To ensure that DBH is able to submit timely claims for reimbursement for services provided, staff in the following disciplines are required to apply for a NPI:

- Psychiatrist
- Licensed Clinical Social Worker
- Licensed Clinical Psychologist, PhD/PsyD
- Registered/Waived Psychologist
- Unlicensed Behavioral Health Worker (Social Worker II, Mental Health Specialist, Alcohol and Drug Counselor)

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**Required Health Care Providers**  
(continued)

- Other Physician, General Practice
- Registered Nurse
- Licensed Vocational Nurse
- Licensed Marriage & Family Therapist
- Licensed Psychiatric Technician
- Registered/Waived Social Workers
- Registered/Waived Marriage & Family Therapist
- Occupational Therapist

**Note:** Please see the [HIPAA National Provider Identifier \(NPI\) Procedure](#) for application instructions.

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**DBH Clinics**

DBH clinics seeking Medicare and Medi-Cal certification must first obtain a NPI. Requests to obtain, update, or deactivate an organizational NPI must be referred to the Office of Compliance. The Office of Compliance is responsible to maintain the NPI profile for DBH clinics.

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**Contract Agencies**

Contract Agencies have the responsibility to establish, maintain and update the NPI profile for their respective agency. If changes are made to the NPI profile, it is also the responsibility of the contract agency to report to the appropriate DBH Program Manager and State Agency the change to ensure records are consistent. Consistency in the information between DBH, applicable State agency and NPI website will prevent delays in the certification or re-certification process.

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**Requirement to Share Information**

As outlined in the HIPAA Privacy Rule, HIPAA covered providers must disclose their NPI to other providers, health plans, clearinghouse, and any entity that may need it for any standard transaction.

Dissemination of data from the National Plan and Provider Enumeration System (NPPES) began September 4, 2007. NPPES health care provider data that may be disclosed under the Freedom of Information Act (FOIA), *will* be disclosed to the public by the Centers for Medicare & Medicaid Services (CMS). In accordance with the e-FOIA Amendments, CMS discloses data via the Internet utilizing what is known as the NPI Registry.

**Note:** The Internet Provider (IP) address to the NPI Registry is:  
<http://nppes.cms.hhs.gov/NPPES/NPIRegistryHome.doc>

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**HIPAA National Provider Identifier (NPI) Policy, Continued**

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**References**

- Centers for Medicare and Medicaid Services. *Guidance on Compliance with the HIPAA National Provider Identifier Rule.* [http://www.cms.hhs.gov/NationalProvIdentStand/downloads/NPI\\_Contingency.pdf](http://www.cms.hhs.gov/NationalProvIdentStand/downloads/NPI_Contingency.pdf)
  - Centers for Medicare and Medicaid Services. *NPI Overview.* <http://www.cms.hhs.gov/NationalProvIdentStand/>
  - HIPAA Privacy Rule, 45 C.F.R., §162.406 – 162.412
  - The Freedom Of Information Act, 5 U.S.C. §552
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