

Colorado NPI Law FAQs for Providers

Provider Frequently Asked Questions

1. What is the Colorado National Provider Identifier (NPI) Law?

HB 18-1282 requires newly enrolling and currently enrolled Organization Health Care Providers (not individuals) to obtain and use a unique NPI for each service location and provider type enrolled in the Colorado interChange. The new Colorado NPI Law will require providers to submit every claim using a unique NPI that is associated with the Provider Type and Site.

2. I participate as a provider in Health First Colorado. What is the Medical Assistance Program?

The Medical Assistance Program is a term that includes Health First Colorado (Colorado's Medicaid Program) and Child Health Plan *Plus* (CHP+). It also includes other services provided under Health First Colorado, such as providers who participate in Home and Community-Based (HCBS) waiver programs.

3. I am not a hospital or hospital-based clinic. Do I need to comply with the law and new regulations?

Yes. All providers who are not individuals (e.g. physician, nurse practitioner) must comply with the Colorado NPI Law and resulting regulations.

4. I am a hospital-based clinic. Do I need to comply with the law and new regulations?

Yes. However, if the clinic is located on the main campus of the hospital and is covered under the license of the hospital, then the provider must determine if the clinic is a subpart of the hospital. If the provider determines that the clinic is a subpart, then they are required to receive an NPI that is separate from the hospital's NPI. The clinic must complete a separate enrollment in the Medical Assistance Program using its separate NPI.

5. Our hospital has several physician clinics on our main campus. Does each clinic need to have a unique NPI and enroll with Health First Colorado?

If the clinics are located on the main campus of the hospital and are covered under the license of the hospital, then the provider must determine if each clinic is a subpart of the hospital. If the provider determines that a clinic is a subpart, then that clinic is eligible and required to receive an NPI that is separate from the hospital's NPI. Each clinic must then complete a separate enrollment in the Medical Assistance Program using its unique NPI. The Department recommends that hospitals identify each clinic on their main campus as a subpart of the hospital. In addition, if a clinic voluntarily participates as a Primary Care Medical Provider (PCMP) in the Department of Health Care Policy & Financing's (the Department's) Accountable Care Collaborative (ACC) or Alternative Payment Model (APM), the clinic must be identifiable from other goods and/or services, including services provided by specialists, provided by the hospital through a separate and unique NPI.

6. What's the difference between a subpart and distinct part unit?

A subpart means a component or separate physical location of an Organization Health Care Provider that may be separately licensed or certified. Each Organization Health Care Provider must determine if they have a subpart (s) that is required to have an NPI. The Colorado NPI Law does not change the definition of a subpart and uses the existing federal definition. A distinct unit operates under its own payment or reimbursement under Medicare or the Medical Assistance Program. Payment, reimbursement and/or how a provider submits claims for services provided in a distinct part unit of an organization (e.g. hospital, nursing home) is not changed by the Colorado NPI Law.

7. I participate as a Primary Care Medical Provider in the Department's ACC or APM. Do I need a unique NPI?

If the PCMP is a facility, they are required to comply with this law. If the PCMP is an individual, and individual will only be assigned one NPI.

8. Our hospital has two sites, our main campus and an off-campus location. The off-campus location has two clinics at the location. Do those two clinics need to have two unique NPIs and enrollments and enroll with Health First Colorado?



Yes. Each location not on the main campus of a hospital must have a unique NPI and enroll separately with Health First Colorado. These locations should be individually identified on the hospital's license addendum.

9. We are a rural health clinic with two locations in the same town. Do each of these locations need to have two unique NPIs and enrollments?

Yes, there should be a unique NPI and enrollment for each of the two locations.

10. We are a rural hospital provider that owns our own ambulance. Do we need to have a unique NPI for emergency and non-emergent services?

Yes, emergency and non-emergent transportation are two separate provider types and services under Health First Colorado. The provider should have a separate NPI and Health First Colorado enrollment for the emergency services and another NPI and Health First Colorado enrollment for the non-emergent services. In addition, the hospital should have an NPI for the hospital services that is separate from the NPIs used for emergency services and non-emergent services.

11. Is getting a new NPI difficult? How do I get a new NPI?

No, it is not difficult to get a new NPI. [Please visit the National Plan & Provider Enumeration System \(NPPES\) site](#) for more information on how to sign up for a new NPI.

12. I'm a doctor who provides services at several locations - two clinics and at the hospital. Do I have to get an NPI for the locations that I see Health First Colorado members?

No. Individuals, such as a physician, are not eligible to receive more than one NPI.

13. I only participate as a provider in CHP+ and only contract with a managed care entity. I do not provide services for Health First Colorado. Do I need to follow the Colorado NPI Law?

Yes, the Colorado NPI Law covers all providers, even those who only contract with a Health First Colorado and CHP+ managed care entity.



14. I am a home health agency that provides both home health and hospice services. Do I need two unique NPIs?

Yes, home health and hospice services are two separate provider types and need two unique NPIs.

15. We are BOCES that bills for services that are performed in several different schools. Do we need to get a unique NPI for each school?

No. Under the regulations, Boards of Cooperative Educational Services (BOCES) and School Districts that provide services under the School Health Program do not need unique NPIs for each school. Community-based locations (e.g., schools, homeless shelters, recreational centers, senior centers) are not required to get an NPI under this regulation. If a community-based location does not have an NPI, populating the service location is not necessary.

16. What kind of providers don't qualify to receive an NPI?

Atypical providers who do not provide medical services are not required to have an NPI. There are a few providers that may enroll in provider types of case managers and HCBS waiver providers that are not eligible to get an NPI. These providers may not meet the definition of a typical health care provider by the federal government, such as homemaker services, but they still provide necessary services to Medical Assistance Program members.

17. We are a clinic and our physicians provide services at the hospital. Do we need to use the hospital NPI on our claim when they provide services at the hospital location?

Yes. The clinic should use their NPI in the Billing Field on the claim, the Physician's NPI in the Rendering Provider Field on the claim, and the Hospital's NPI on the Service Location Field on the claim.

18. We provide services under two different provider types, but only have one location. Do we need two unique NPIs?

Yes. Each provider type providing services at each location will need a unique NPI. For example, if you are enrolled as both under Nursing Facility and HCBS provider types and have the same address, you will need to have two unique NPIs that identify the different provider types.



19. We provide services under two different provider types and have three locations. How many NPIs do we need to have?

The number of NPIs needed is dependent on the number of services provided under each location. For example, if Nursing Facility and HCBS Waiver program services are both provided at all three locations, then six unique NPIs would be required - one for each provider type at each location. However, if one location provides Nursing Facility and HCBS Waiver program services, while the other two locations only provide Nursing Facilities services, then only four NPIs would be required - two at the location that provides Nursing Facility and HCBS waiver program services, one for the location that provides only Nursing Facility services, and one for the other location that provides only Nursing Facility services.

20. We provide HCBS and non-emergent transportation services for members not covered by the HCBS Waiver programs and have enrolled under each provider type. Do we need two different NPIs?

Yes. HCBS and non-emergent transportation are two separate provider types and require two unique NPIs. For providers who only provide transportation services through HCBS Waiver programs, they only need one NPI per unique location when they enroll under the HCBS provider type.

21. We are a Single-Entry Point (SEP) that provides HCBS services and rehabilitation services. How many NPIs do we need?

If all the services are provided out of a single location, then three unique NPIs would be required - one for the SEP (Case Manager provider type), one for the HCBS services, and one for the rehabilitation agency.

22. We are a large health system with 30 clinics located around the metro Denver area, but we bill from a central location. Do we need thirty (30) NPIs to identify each clinic?

Yes. Each clinic is required to have a unique NPI. The central billing location can have an NPI to identify the billing provider and can be used in the Billing Provider Field on the claim, and then each NPI for the service location is required to be used in the Service Facility Location Field on the claim.



23. Why can't I get a separate Medicaid ID number instead of getting a new NPI?

Under HIPAA regulation, a Medicaid ID cannot be used in place of an NPI when billing a claim if the provider is required to have an NPI.

24. Where do I indicate my Service Facility Location on a claim?

For information on submitting batch claims, please visit the [Washington Publishing Company web page](#).

For information on submitting web portal claims, instructions will be added to the [Quick Guides web page](#).

25. Am I required to use my new unique NPI as the billing provider on the claim form?

If a provider has more than one provider type, they must use the unique NPI as the billing provider. If providers have the same provider type for multiple locations, they may use the new NPI in the Service Facility Location field on the claim, but they can also use the new NPI in the Billing Provider field if they choose.

26. How do I report my new NPI to Health First Colorado?

For information on reporting a new NPI to Health First Colorado for previously enrolled locations, instructions will be added to the [Quick Guides web page](#). If the new NPI number is for a location that is new or not previously enrolled, then the location needs to be enrolled with Health First Colorado.

27. Do I need to enroll my new NPI with Medicare?

When a provider is using the new unique NPI on a claim, they will need to submit a change application to get that NPI added to their enrollment. If the provider uses the new NPI on a claim in either the billing or Service Facility Location field on the Medicare crossover claim, Medicare will edit on that NPI. The provider will need to ensure that both Medicare and Health First Colorado have the NPI enrolled and active for a crossover claim to work.

28. Will claims automatically crossover from Medicare using my new NPI?

When a provider is using the new unique NPI on a claim, they will need to submit a change application to get that NPI added to their enrollment. If the provider uses



the new NPI on a claim in either the billing or Service Facility Location field on the Medicare crossover claim, Medicare will edit on that NPI. The provider will need to ensure that both Medicare and Health First Colorado have the NPI enrolled and active for a crossover claim to work.

29. Will claims automatically crossover from Medicare?

When a provider is using the new unique NPI on a claim, they will need to submit a change application to get that NPI added to their enrollment. If the provider uses the new NPI on a claim in either the billing or Service Facility Location field on the Medicare crossover claim, Medicare will edit on that NPI. The provider will need to ensure that both Medicare and Health First Colorado have the NPI enrolled and active for a crossover claim to work.

30. For our rural hospital providers who provide multiple services, will they need a special NPI for each of these?

Yes. The number of NPIs needed is dependent upon which services require the provider to enroll with a different provider type. For example, they will need a unique NPI for each of these services enrolling as a hospital, a unique NPI for rural health clinics, a unique NPI for nursing facilities, a unique NPI for their ambulance that provides emergency services, and a unique NPI if that ambulance provides non-emergent services.

31. Does this law require providers to enroll as a new provider type?

No. Participation in the Medical Assistance Program already requires providers to enroll as the correct provider type. This law does not change that requirement. This law only requires that providers have a separate NPI for each provider type. For example, some providers who participate in HCBS Waiver programs provide various services under several waiver programs through the HCBS provider type. Since the HCBS provider type is a single enrollment, there is only one NPI needed to provide all services under HCBS waiver programs.

Federally Qualified Health Center (FQHC) Frequently Asked Questions

32. Do I need a unique NPI for every type of service I provide as an FQHC?

No. Each location needs an NPI, not service lines within a location.



33. I am an FQHC with several off-campus locations where laboratory and radiology services are not considered a covered FQHC benefit and are billed under our main hospital NPI. Do I need to obtain separate NPI numbers for the laboratory and radiology services provided at my off-campus location?

No. The FQHC locations need an NPI that will be used for services performed at the location. The laboratory and x-ray services will be billed by the entity that provides them. If the FQHC services are on-campus and you are performing the lab and radiology services on-campus, then the lab and radiology services should be billed through the hospital's main campus NPI.

34. I am an FQHC that provides dental services at my location. Do I need 2 NPIs?

Yes. You need 2 unique NPIs, 1 for the FQHC provider type, and another for the for Dental - Clinic provider type. In order to submit for and receive a dental encounter rate, your Dental – Clinic provider type needs a unique NPI. The new NPI for the Dental – Clinic enrollment (assuming the provider wishes to retain their current NPI for the FQHC enrollment) will need to be updated on the provider's Dental - Clinic enrollment by 2021 for currently enrolled sites.

Contact the [Provider Services Call Center](#) at 1-844-235-2387 with questions regarding the Colorado NPI Law, or visit the [Colorado NPI Law web page](#).

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