

National Provider Identifier (NPI) Ordering, Prescribing, and Referring (OPR) School Health Services (SHS) Requirement

Guide to complete for Individual Providers

This document is intended to be a guide as the SHS Program moves forward with the next steps in fulfilling the National Provider Identifier (NPI) Ordering, Prescribing, and Referring (OPR) Provider requirements. This is a Centers for Medicare and Medicaid Services (CMS) requirement, and we want to allow ample time for our participating school districts and Boards of Cooperative Educational Services (BOCES) to prepare for implementation.

The current requirement is to include the [school district or BOCES NPI in the ordering provider field for all Physical Therapy \(PT\), Occupational Therapy \(OT\), and Speech Language Pathology \(SLP\) Services](#). Starting July 1, 2024 the individual provider's NPI is required in this field. This also requires them to be enrolled as a Health First Colorado (Colorado's Medicaid Program) Provider in Colorado. We recommend the following steps to implement this requirement at your district/BOCES for all [qualified](#) Occupational Therapists (OTs), Physical Therapists (PTs), and Speech Language Pathologists (SLPs):

Step 1. Meet with any relevant leadership at your district/BOCES to discuss this requirement. This may include Special Education and/or Health Services department leadership as well as Human Resources.

Step 2. Use the [NPI Registry website](#) to search for the individual provider's NPI. If your provider does not already have an NPI, ask that they [complete the steps outlined on the NPI Registry website to obtain an NPI](#). The [following guide](#) is available to help them complete the necessary steps. Move on to Step 3 after receiving the NPI.

Step 3. Have your provider register as an "Individual Within a Group" for [Health First Colorado](#) using the provider types and specialty codes listed below if they are not already enrolled. Providers can find detailed instructions including a [Provider Enrollment Manual](#) on the [Enrollment Type website](#). [Provider NPIs should be added to the Provider Web Portal while completing the Health First Colorado Provider application](#).

- Occupational Therapists - Provider Type 28 Specialty Code 450
- Physical Therapists - Provider Type 17 Specialty Code 451
- DORA-licensed Speech Therapists - Provider Type 27 Specialty Code 452
- CDE-licensed Speech Therapists - Provider Type 42 Specialty Code 777

Providers will need the district's insurance information to complete the application. It is recommended that both the individual provider and the SHS coordinator retain the application tracking number (ATN) for their application process in case any issues arise along the way. The coordinator may be added as a secondary contact to the Health First Colorado Provider Application to receive a confirmation email including the ATN.

Step 4. Work with your billing provider to determine the next steps in adding the individual provider NPI to your billing platform.

Frequently Asked Questions-

Is there a cost associated with obtaining an NPI?

No.

How long does it take to obtain an NPI?

The process of requesting an NPI should only take a few minutes, with standard approval estimated within a few days.

Is there a cost associated with enrolling as a Health First Colorado Provider?

No.

How long does it take to enroll as a Health First Colorado provider?

The enrollment process should take less than half an hour as long as the individual provider has all application information available, like the district insurance policy information. Gainwell processes all applications within 5 business days. If the application is returned for errors, the provider must send it back as soon as possible. Gainwell then has another 5 business days to review corrections.

Can coordinators assist in the enrollment process?

It is recommended that coordinators act as a resource to individual providers, but that individual providers complete the Health First Colorado enrollment process since social security numbers are required. However, this can be left up to district policy. It is recommended that coordinators come up with a system for tracking individual provider enrollment, including the ATN, should issues arise. By clicking [this link](#) you will be taken to a spreadsheet that may be used to track the status of provider enrollments and may be modified for your district/BOCES. An ATN is also required for HCPF to assist with enrollment issues.

Will individual providers be required to obtain their own insurance?

The individual provider will not need to obtain their own insurance policy for services provided under the SHS program. The provider will continue to practice under the district/BOCES insurance policy. Insurance requirements will remain with the participating school district/BOCES. It is recommended that districts/BOCES maintain a current certificate of insurance in their provider portal to avoid any processing delays.

Do individual providers have to update insurance information in their provider portal every year?

Individual providers are required to update current insurance policy effective and end dates in their provider portal. A copy of the insurance policy is not required in the portal.

Will individual providers be required to complete revalidation?

Yes, individual providers will be required to complete revalidation at least once every five years. Revalidation instructions including a Provider Revalidation Dates Spreadsheet can be found on the [HCPF Revalidation page](#).

Is an NPI already a requirement for Speech Language Pathologists (SLPs)?

Many SLPs may already have an NPI as required by the American Speech Language Hearing Association (ASHA). You can find more information on [their website](#).

Do Speech Language Pathology Assistants, Occupational Therapy Assistants, and Physical Therapy Assistants have the same requirement?

No, their supervising Speech Language Pathologist, Occupational Therapist, or Physical Therapist will be listed as the OPR.

What is the deadline to meet the NPI OPR requirement?

All participating school districts/BOCES must have this process complete for all current OTs, PTs, and SLPs by June 30, 2024. OTs, PTs, and SLPs must complete these requirements before being added to the October - December 2024 (OD24) direct service staff pool list as well as staff pool lists for any subsequent quarters. FY 2022-23 stakeholders have piloted this process starting in October 2022 to share these best practices.

What happens if individual providers do not complete this process?

Services with dates of service July 1, 2024 or after will be denied without a valid NPI OPR. If individual providers do not complete this process prior to submitting claims, their service claims will be denied, that provider cannot be on the direct service staff pool list, and the district/BOCES will be out of compliance. Non-compliance could put your district/BOCES interim payments at risk. It is strongly suggested that this requirement be added to district job descriptions for these positions.

Our district/BOCES staff pool list is currently open. We hired a new provider but they haven't completed this process. Can we still add them to the staff pool list?

Providers who have not completed this process may not be added to your direct service staff pool list. You may create a vacancy on your staff pool list if the provider is expected to complete this process within the first two weeks of the quarter. Only costs for the time the qualified provider was on the staff pool list with a valid NPI can be reported on your district/BOCES cost report regardless of their length of employment.

Are provider site surveys required?

Site visits are not required as part of this process because services take place in a school setting. If a site survey is requested, remind Gainwell that schools are the place of service.

How do I know if a provider from my district/BOCES is a Health First Colorado-enrolled provider?

Program coordinators should communicate with providers directly to request their Health First Colorado provider IDs. This is recommended so that providers know that their information is being used and know the purpose of this requirement. However, a good starting point is the [Health First Colorado Provider lookup website](#).

What contact information should providers use when filling out their applications?

Providers should use their personal address and phone numbers so that their NPI and Health First Colorado provider IDs follow the provider. Program coordinators should not use their own contact information as this causes processing delays. Please note that using different information on the NPI and Health First Colorado provider applications could cause a delay in processing.

Do I need to complete this process for Audiologists?

This requirement does not apply to Audiologists at this time.

Do providers who work for more than one district/BOCES need to complete this process for each district/BOCES they work for?

A separate enrollment is not needed for each district/BOCES where the providers work. However, the provider should indicate each district/BOCES they work at in the Group Association area of their application.

One of my providers practices in the community and is already registered as a Billing Individual. Do they need to complete this process? Do they need to affiliate to school district?

Affiliations are not required for claims processing. The NPI of the OPR provider has to be actively enrolled in Health First Colorado and be on the claim. If you have a provider who is an existing OPR or Billing Individual (BI), they do not need to change enrollment types to an Individual within a Group (IWG).

A provider at my district was enrolled as a Health First Colorado provider at their previous place of employment and does not have their logon information. Is this required to update their enrollment with their current information?

The provider will need to contact their previous employer to obtain their logon information to maintain a current Health First Colorado provider enrollment. They may also choose to complete the [administrative password reset process](#).

Will provider portal accounts be deactivated if they are not logged on to every 60 days?

Yes. Best practice is to sign in once a month to avoid deactivation.

An SLP at my district/BOCES has an expired DORA license and needs to enroll as a provider under their CDE license. How long does disenrollment take?

Provider disenrollment takes 30 days. Providers accept the 30-day disenrollment period when they sign the [Provider Participation Agreement form](#). More information on provider type changes can be found under the “Provider Enrollment Type Changes” section of the [Provider Enrollment Page](#).

Do NPIs expire?

No.

Answers to many common questions may be found in the [Provider Web Portal Quick Guides](#).

Please use the resources listed on the [Provider Contacts page](#) or reach out to Olga Gintchin 303-866-4234 or olga.gintchin@state.co.us with any questions or concerns.

Thank you for your help in moving forward with this requirement.