

## Health First Colorado and CHP+ Provider Revalidation and Implementation of Colorado NPI Law

Child Health Plan *Plus* (CHP+) and Health First Colorado (Colorado's Medicaid Program) providers must revalidate in the program at least every five (5) years to continue as a provider. Organization Health Care Providers are required to obtain and use a unique National Provider Identifier (NPI) for each service location and provider type enrolled.

## Revalidation

- All providers must revalidate at least every five (5) years to continue their participation in Health First Colorado and CHP+. This is a federal requirement under the Affordable Care Act (42 CFR §455.414). Revalidation involves reconfirming some of the provider's enrollment information so the Department of Health Care Policy & Financing (the Department) has accurate data and can properly screen the providers to ensure they are eligible to provide services to members.
- Information about the upcoming revalidation cycle will be published several months before revalidation starts via Provider Bulletins, emails, etc. It is crucial that providers update all email addresses in their enrollment profiles before they revalidate so they receive these notices. The Department will also be doing outreach through provider associations, advocate groups, and other stakeholders.
- Providers will be given at least a six (6) month notice via email in advance of their enrollment deadline. Additional email notices will be sent every month that the provider has not begun a revalidation application.
- The first group of providers must complete revalidation in October 2020, and they will receive email notices starting April 2020. Each enrollment (individual or service location) must be revalidated separately using a link in <u>the Provider Web Portal</u>. *This link will become available six (6) months before the provider's revalidation deadline.*
- Training materials, FAQs, and revalidation checklists will be available for providers on the <u>Provider Main web page</u>. Additional trainings may be offered in the community.
- Much of the information needed for revalidation will be pre-populated. Some examples of data required include licenses and certifications, insurance policies, disclosures, etc.
  Providers will not be able to change their enrollment type or tax ID during revalidation. If changes need to be made, a new enrollment application must be submitted, not a revalidation.



- The revalidation process will work similarly to the enrollment process, which will require providers to submit required information and documents. A new Application Tracking Number (ATN) will then be assigned upon submission. If the application requires additional information or changes, a notice will be emailed to the provider.
- Some applications will still require a new site visit by DXC Technology (DXC) and some providers may require fingerprinting. Providers should begin revalidation as quickly as possible after they receive the notification to ensure that these processes are completed on time.

## **New Colorado NPI Law Requirements**

HB 18-1282 requires newly enrolling and currently enrolled Organization Health Care Providers (not individuals) to obtain and use a unique National Provider Identifier (NPI) for each service location and provider type enrolled in the Colorado interChange.

- Starting 2020, the Department will require providers to submit a claim with a unique NPI so that the Department, members, and policymakers have more transparency to where services are being provided.
- Over the years, providers have expanded to create a number of separate physical locations for delivering health care. When individuals seek care in inappropriate locations, delivery of that level of care in that setting can increase costs in the overall health care system.
- Under this new law, providers will not share the same identifier across sites as their affiliated locations. Because the costs associated with care delivered at different locations are not transparent, it may be impossible for the Department to understand the basis for costs and for policymakers to evaluate the effects.
- Under federal regulations, most providers may obtain an NPI at no cost that identifies the services provided at each of their sites and their subparts. For more information about NPI, visit the <u>National Plan & Provider Enumeration System (NPPES) website</u>.
- What is an NPI? The 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. Covered health care providers and all health plans and health care clearinghouses must use the NPIs in the 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. The NPI must be used in lieu of legacy provider identifiers in the HIPAA standards transactions. As outlined in the Federal Regulation, HIPAA covered providers must also

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share their NPI with other providers, health plans, clearinghouses, and any entity that may need it for billing purposes.

The implementation date for **new providers**, i.e., those not enrolled, is January 1, 2020.

The implementation date for **all off-campus hospital locations** is January 1, 2020.

The implementation date for **currently enrolled providers** is January 1, 2021.

When providers enroll, they will need to have a unique NPI for each Provider Type (e.g., Rural Health Clinic, Community Mental Health Center, Transportation) at each site from which the Organization Health Care Provider delivers medical care, services, or goods authorized under the Medical Assistance Program. For a complete list of Provider Types please visit the Information by Provider Type web page.

**Note:** This new law does not apply to individual practitioners (Individuals Within a Group or Billing Individuals) who should have only one enrollment and one NPI per person.

The Department will provide more detailed information regarding the implementation of this new state law before a provider's revalidation deadline.

Contact the <u>Provider Services Call Center</u> at 1-844-235-2387 with questions regarding the Provider Web Portal or the Colorado NPI Law. For more information about the Colorado NPI Law, visit the <u>Colorado NPI Law web page</u>.

June 2020

