TO: Community Providers of Health Care Services Funded by the Department of Human Services

FROM: Carol L. Adams, Ph.D., Secretary, Illinois Department of Human Services

DATE: January 24, 2008

SUBJECT: HIPAA National Provider Identifier (NPI) Contingency Plan for Health Care Providers

The purpose of this memorandum is to alert you to necessary actions to ensure continued payment for services you deliver. Community providers who provide health care services to children, families and adults funded by the Illinois Department of Human Services (Department) have a limited amount of additional time to comply with National Provider Identifier (NPI) regulations under the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA). As permitted by the federal Centers for Medicare and Medicaid Services, the Department of Human Services (DHS) has implemented a contingency plan to allow payments to continue to be made to covered health care entities who were unable to meet the original May 23, 2007 deadline for compliance with the federal NPI regulations. The DHS contingency plan allows for an extension of the May 23, 2007 deadline that requires a health care provider to submit an NPI number prior to submitting bills for payment.

This follows up previous notifications to most Department-funded health care providers about the NPI requirement and the original federal deadline of May 23, 2007. Health care providers were asked to apply for their NPI numbers and to register those numbers with the Illinois Department of Healthcare and Family Services (HFS) or, if not enrolled with HFS, to fax their NPI information to specific entities within the Department. Many health care providers have not yet complied with this requirement.

All DHS programs have continued to pay health care bills under the contingency plan, even if the provider’s NPI number has not been registered with HFS or DHS. However:

Effective on and after March 1, 2008, all health care bills submitted electronically to any DHS program will be denied if the provider of health care services does not
have an NPI number registered with HFS or DHS.

Health care providers, as defined by HIPAA and subject to the NPI requirements, may include:
- Individually enrolled health care professionals who bill in their own name; or
- Employees who are health care professionals who have a payee that bills on their behalf

Covered health care providers who have not yet registered an NPI with HFS or DHS are requested to follow the steps identified below.

1. Go to the federal Centers for Medicare and Medicaid Services website at http://www.cms.hhs.gov/NationalProviderStand/ and read about the federal requirements concerning the NPI for health care providers. Determine whether or not you are required to obtain an NPI.

2. If you are a HIPAA covered health care provider, apply for an NPI number as soon as possible. Go to http://nppes.cms.hhs.gov to apply via a web-based application. A third party organization may submit the NPI application on behalf of health care providers whom they employ. Each individual provider (the provider who actually delivers the services) will have a unique NPI number.

3. When applying for an NPI, health care providers are required to submit a taxonomy code and may also be required to submit state license information. The taxonomy code identifies the provider type, such as physical therapist, clinical psychologist, etc. The Taxonomy Code Set can be found at www.wpc-edi.com/codes/taxonomy.

4. Once you have obtained your NPI, please register your number in one of the following ways.
   - If you (or your covered health care employees) are enrolled with the Illinois Department of Healthcare and Family Services (HFS), please go the HFS website at http://www.illinoisnpi.com to register each individual provider's NPI number. You will need to have each provider's HFS provider number and the taxonomy code(s) that were used to apply for your NPI number.
   - If you (or your covered health care employees) are not enrolled with HFS, please mail or fax a copy of your NPI verification notice, contact information including phone number and e-mail address and your tax ID number which may be your Social Security Number or a Federal Employer Identification Number (FEIN) to the appropriate DHS contact listed below:
If you have questions about this notice please contact:

**Alcoholism and Substance Abuse:**
Jayne Antonacci  
(217) 785-7754  
FAX (217) 558-4656

**Developmental Disabilities:**
Marie Havens  
(217) 782-9536  
FAX (217) 558-2799

**Early Intervention CBO:**
(800) 634-8540

**Mental Health:**
Anne Mahalik  
(847) 742-1040 Ext. 2435  
FAX (847) 742-2614

Thank you for your prompt attention to this matter.

cc: Executive Staff  
NPI Steering Committee