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January 31, 2012

TO: Legal Entity Executive Directors and DHS Executives
FROM: *Robin Kay, Ph.D.*
Robin Kay, Ph.D.
Chief Deputy Director

SUBJECT: INTEGRATED SYSTEM EDIT TO MEET HIPAA 5010 REQUIREMENTS
UNIQUE NATIONAL PROVIDER IDENTIFIER AT SERVICE LOCATION

In the Department of Mental Health's (DMH) ongoing effort to provide direction to our contract providers concerning the new 5010 standards to comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), we are informing you of new edits being implemented in the Integrated System (IS). One of the HIPAA Federal regulations requires that all claims be submitted with the National Provider Identifier (NPI) number for providers. The new edits being implemented in the IS prohibit legacy provider identifiers when submitting electronic data interchange (EDI) claims, and require the NPI number to be unique for a rendering provider within a service location (e.g., 1940A). This change means that the rendering provider NPI must **not** be associated with any particular service location more than once for the same time period.

Through analyzing IS data, we have uncovered situations where the rendering provider NPI is associated more than once to the same service location for the same time period. Below is an example of a provider in the IS:

Before	DMH Rendering Provider ID: 123456						
	NPI	Staff Code	Rend Prov ID	Rend Prov Name	Service Location	Effective	Termination
	1234567890	PROV123	123456	Friendly Fred	7000A	4/21/2009	10/1/2011
	DMH Rendering Provider ID: 678910						
	NPI	Staff Code	Rend Prov ID	Rend Prov Name	Service Location	Effective	Termination
	1234567890	PROV456	678910	Friendly Fred	7000A	4/21/2009	

Using the example above, the rendering provider is associated with service location 7000A on two staff records for the same period of time. All inbound EDI claims submitted for this rendering provider with a date of service between 4/21/2009 and 10/1/2011 will be denied by an IS Rule with the error description

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“Validate Rendering Provider.” This example demonstrates just one type of duplication of an NPI within the same service location.

To eliminate the duplicate occurrence in this example, DMH will modify the termination date to 01/01/1800 for staff code PROV123. The result is that staff code PROV123 will no longer be valid and must not be used. Instead, only staff code PROV456 will be valid for service location 7000A.

DMH Rendering Provider ID: 123456						
NPI	Staff Code	Render Prov ID	Render Prov Name	Service Location	New Eff Date	New Term Date
1234567890	PROV123	123456	Friendly Fred	7000A	01/01/1800	01/01/1800

After

DMH Rendering Provider ID: 678910						
NPI	Staff Code	Render Prov ID	Render Prov Name	Service Location	Eff Date	Term Date
1234567890	PROV456	678910	Friendly Fred	7000A	04/21/2009	

Impact to EDI Providers if Duplicate Associations are Not Removed

- 1) Denied 5010 EDI Claims
- 2) IS Rendering Provider Records cannot be modified on affected records

Impact to Direct Data Entry (DDE) Providers if Duplicate Associations are Not Removed

- 1) IS Rendering Provider Records cannot be modified on affected records

DMH will take steps to eliminate duplicate occurrences of Rendering Provider NPI associations within a service location for the same time period. As demonstrated in the example, DMH will modify the Rendering Provider assignment date range and/or terminate the staff code. This clean up involves many different scenarios. Please note that DMH will carefully examine each record on a case-by-case basis to determine the best resolution. The Attachment “Example of HIPAA NPI Duplication within a Service Location” provides additional information regarding the steps that DMH will take to eliminate duplicate NPI occurrences within the service location for the same time period.

Legal entities with duplicate NPI occurrences within the same service location for the same time period can expect to receive an Access file of the impacted records via Electronic File Transfer (EFT) File. The file will contain information for all rendering providers in a legal entity whose NPI has multiple associations within the same service location for the same time period. We anticipate that the HIPAA 5010 Rendering Provider NPI Duplicate EFT Data will be sent the week of January 30, 2012. In addition, we strongly recommend EDI providers share this letter and the forthcoming HIPAA 5010 Rendering Provider NPI Duplicate Data with their vendors.

Please monitor both the Revenue Management Division (RMD) Bulletins and the Integrated System (IS) Alerts for further information. In addition, please take this opportunity to submit automated rendering provider forms to update or terminate any staff from the legal entity. If you or your staff have questions regarding the changes, please contact the Provider Support Unit via the Chief Information Office Bureau (CIOB) Help Desk at (213) 351-1335. When you call, please provide the following information and retain the ticket number if follow-up is needed:

- 1) Reference "HIPAA 5010 NPI Data Clean Up"
- 2) Name of Rendering Provider(s)
- 3) Rendering Provider ID(s)
- 4) NPI Number(s)
- 5) Staff Code(s)
- 6) Name and valid email address of the person who will receive the response from the CIOB System Access Unit

Your cooperation in this matter is appreciated.

RK:LW:lw

Attachment

c: Executive Management Team
DMH District Chiefs
Bruce Saltzer, ACHSA
T. J. Hill, ACHSA

**INTEGRATED SYSTEM (IS) EDIT TO MEET HIPAA 5010 REQUIREMENTS –
UNIQUE NATIONAL PROVIDER IDENTIFIER (NPI) AT SERVICE LOCATION**

Example

Two IS Rendering Provider Records (two staff codes), same NPI number occurs twice within one Service Location for the same date range, Service Location Association Effective Date = Service Location Association Termination Date for one of the Rendering Provider Records (staff codes).

Scenario: This example identifies an occurrence where

- (1) there are two IS rendering provider records (staff codes) for the same rendering provider,
- (2) the Association Effective Date = Association Termination Date for one of the records, and
- (3) the NPI number is assigned to same service location more than once on 7/1/2010.

NPI	Rend. Prov. ID	Staff Code	Rend. Prov. Name	Service Location	Effective Date	Termination Date	New Effective Date	New Termination Date
1234567890	123456	PROV123	John Doe	7000A	7/1/2010	7/1/2010	1/1/1900	1/1/1900
1234567890	789012	PROV456	John Doe	7000A	7/1/2010			

Impact: In this example, the current situation will have the following impact on claims:

Electronic Data Interchange (EDI): The 5010 EDI inbound claim with a 7/1/2010 service date billed under Service Location 7000A using NPI 1234567890 will be denied by IS Rules.

Direct Data Entry (DDE): No impact

DMH Action: To correct records with this type of duplication, DMH will modify the Association Effective Date to 1/1/1900 and modify the Association Termination Date to 1/1/1900 for staff code PROV123.

Expected Results:

Staff Code PROV456 will be the only valid record for service location 7000A.
Staff code PROV123 will be invalid and must not be used.

EDI: -4010 claims with invalid Staff Code/Rendering Provider ID will be denied by IS Rules.
-5010 claims only allow the NPI number to be submitted

DDE: - Only one occurrence of the Staff Code/Rendering Provider ID will be available in the Rendering Provider Selection drop down list in the IS.

Electronic File Transfer (EFT) Data: -Will reflect changes made to the Association Effective Dates and Termination Dates.

This clean up involves many different scenarios. DMH will carefully examine each NPI duplicate occurrence on a case-by-case basis. In some cases, DMH may have to contact you for clarification. Upon your review of the rendering provider list for your legal entity which identifies the revised records, if you have questions regarding any changes, please call the CIOB Help Desk at (213) 351-1335 to open a ticket, referencing the HIPAA 5010 data clean-up project.