

## URI HIPAA PRIVACY POLICY # 39

<b>Title:</b>	<b>UNIQUE IDENTIFIERS</b>	<b>Purpose &amp; Background</b>	<b>See Memo Entitled "HIPAA at URI: Introduction to HIPAA and an Overview of HIPAA Implementation at URI" available online at the URI HIPAA website</b>
<b>Originator (Responsible Department/ Unit):</b>	<b>URI HIPAA Compliance Oversight Committee</b>	<b>Effective Date:</b>	<b>05/22/2018</b>
<b>Applies to:</b>	<b>All URI Departments and Units Designated as HIPAA "Covered Components" and "Business Associate Components"</b>	<b>Revised Date(s):</b>	

### POLICY:

#### I. Healthcare Providers

The standard unique health identifier for healthcare providers is the National Provider Identifier (NPI). The NPI is a 10-position numeric identifier, with a check digit in the 10th position, and no intelligence about the health care provider in the number. A Covered Component that is a covered health care provider must:

- A. Obtain, by application if necessary, an NPI from the National Provider System (NPS) for itself or for any subpart of the Covered Component that would be a covered health care provider if it were a separate legal entity. A Covered Component may obtain an NPI for any other subpart that qualifies for the assignment of an NPI.
- B. Use the NPI it obtained from the NPS to identify itself on all standard transactions that it conducts where its health care provider identifier is required.
- C. Disclose its NPI, when requested, to any entity that needs the NPI to identify that covered healthcare provider in a standard transaction.
- D. Communicate to the NPS any changes in its required data elements in the NPS within 30 days of the change.
- E. If it uses one or more business associates to conduct standard transactions on its behalf, require its business associate(s) to use its NPI and other NPIs appropriately as required by the transactions that the business associate(s) conducts on its behalf.
- F. If it has been assigned NPIs for one or more subparts, comply with the requirements of paragraphs (A) through (E) of this section with respect to each of those NPIs.

A healthcare provider that is not a Covered Component may obtain, by application if necessary, an NPI from the NPS.

#### II. Health Plans

- A. A health plan must use the NPI of any health care provider (or subpart(s), if applicable) that has been assigned an NPI to identify that healthcare provider on all standard transactions where that healthcare provider's identifier is required.

- B. A health plan may not require a health care provider that has been assigned an NPI to obtain an additional NPI.

### **III. Health Care Clearinghouses**

A health care clearinghouse must use the NPI of any health care provider (or subpart(s), if applicable) that has been assigned an NPI to identify that healthcare provider on all standard transactions where that healthcare provider's identifier is required.

### **IV. Standard Unique Employer Identifier**

The Secretary has adopted the EIN as the standard unique employer identifier provided for by 42 U.S.C. 1320d-2(b).

- A. The standard unique employer identifier of an employer of a particular employee is the EIN that appears on that employee's IRS Form W-2, Wage and Tax Statement, from the employer.
- B. A Covered Component must use the standard unique employer identifier (EIN) of the appropriate employer in standard transactions that require an employer identifier to identify a person or entity as an employer, including where situationally required.