

# Unique Provider Identification Per Site of Service



## Background

In recent years, hospitals and health systems have increased the range and availability of services they provide by growing the number of hospital outpatient departments located off the main campuses of hospitals. The result has been greater access to, and a more streamlined approach to health care services. However, because these locations typically bill insurance using systems that are fully integrated with the main hospital, payers have argued that they are unable to determine the exact location of services. This issue has been highlighted by the growth of freestanding emergency departments along the Front Range.

## HB 18-1282: Health Care Provider Unique Identification Per Site of Service

This law requires all hospital outpatient departments that are located more than 250 yards from the main campus of the hospital to apply for, obtain and use on claims for reimbursement for health care services provided at that location a unique national provider identifier (NPI). The off-campus location's NPI must be used on all claims related to health care services provided at that location, regardless of whether the claim is filed through the hospital's central billing or claims department or through a health care clearinghouse.

## What You Need to Know

- For private insurance claims, hospital outpatient departments that are located more than 250 yards from the main campus of the hospital must begin using a unique NPI on claims beginning Jan. 1, 2020.
- For Medicaid claims, the requirements of the bill apply to newly enrolling provider organizations starting Jan. 1, 2020, and to re-enrolling provider organizations starting in Jan. 1, 2021.
- The Colorado Department of Public Health and Environment will review hospitals' compliance with the new requirements as part of the licensing and inspection process for hospitals.

## Additional Resources

- HB 18-1282 [Final Bill](#) and [Fiscal Note](#)
- SB 18-1282 will take effect on Aug. 8, 2018

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