



HEALTH AFFAIRS

THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D. C. 20301-1200

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MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (MANPOWER  
AND RESERVE AFFAIRS)  
ASSISTANT SECRETARY OF THE NAVY (MANPOWER  
AND RESERVE AFFAIRS)  
ASSISTANT SECRETARY OF THE AIR FORCE  
(MANPOWER AND RESERVE AFFAIRS)

SUBJECT: Guidance for Military Health System Use and Disclosure of the Health  
Insurance Portability and Accountability Act National Provider Identifier

This memorandum provides guidance for Military Health System (MHS) use and disclosure of the Health Insurance Portability and Accountability Act (HIPAA) National Provider Identifier (NPI). It provides guidance for both the NPI Type 1 for individual providers and NPI Type 2 for organizational providers.

The responsibilities of the Military Medical Departments' Surgeons General and military treatment facilities regarding NPI use and disclosure is found at attachment 1. This memorandum is effective immediately.

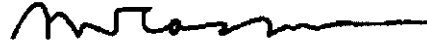
The NPI Final Rule (Title 45, Code of Federal Regulations, Part 162) requires that providers disclose their NPIs to other entities that need NPIs for use in standard transactions.

The NPI is a 10-position numeric identifier that does not contain information about the provider. It is to be used throughout the U.S. health care system to identify health care providers in HIPAA covered standard electronic transactions. The purpose of the NPI is to improve effectiveness and efficiency of the health care industry by enabling more efficient electronic transmission of certain health information.

While the NPI is *required* in HIPAA standard electronic transactions, the NPI Final Rule also states that the NPI *may* be used for any lawful purpose requiring the unique identification of a health care provider. The MHS intends to join providers and health plans across the health care industry in moving towards the best business practice of using the NPI wherever providers need to be identified in order to further simplify administrative health care processes.

The MHS will have all providers obtain and submit their NPI type 1 and NPI type 2 to Defense Medical Human Resources System–internet. This will permit accurate accounting by individual, no matter the location of care.

My point of contact for this initiative is LTC Thomas Greig, who may be reached at (703) 681.1707 or Thomas.Greig@ha.osd.mil.



S. Ward Casscells, MD

Attachments:

As stated

cc:

Under Secretary of Defense (Personnel and Readiness)

Principal Deputy Under Secretary of Defense (Personnel and Readiness)

Assistant Secretary of Defense (Reserve Affairs)

Surgeon General of the Army

Surgeon General of the Navy

Surgeon General of the Air Force

**Guidance for Use and Disclosure of the Health Insurance Portability and  
Accountability Act National Provider Identifier  
within the Military Health System**

**National Provider Identifier Use**

The National Provider Identifier (NPI) Final Rule allows the NPI to be used for any lawful purpose that requires the unique identification of a health care provider; therefore the Military Health System (MHS) will begin using the NPI type 1 wherever a provider's name is used (e.g., with signatures, name stamps, prescriptions, clinical charts, referral forms), as well as the location of care using the NPI type 2.

Military Medical Department responsibilities regarding NPI use:

- Immediately identify business processes that require identification of MHS individual and organizational health care providers to determine where the NPI type 1 and type 2 will be incorporated.
- Implement needed business process changes.
- Provide Military Treatment Facilities guidance regarding the NPI use and disclosure to MHS health care providers and those entities responsible for conducting administrative health care processes that will utilize the NPI.
- Work with TMA to determine and document the need for changes to any central information management systems. Submit system change requests/requirements to TRICARE Management Activity/ Information Management.

**NPI Disclosure**

The MHS is required to disclose NPIs to other health care entities that need NPIs to conduct Health Insurance Portability and Accountability Act standard electronic transactions.

Military Medical Department responsibilities regarding NPI disclosure:

- Ensure that MTFs comply with the NPI final rule requirements regarding NPI disclosure and Service guidance regarding disclosure. Any guidance distributed by the Services regarding NPI disclosure

should remain in keeping with previously published Department of Defense memorandums that restrict the disclosure of DoD personnel information in list formats.

- Provide instruction to MTFs to designate entities within each MTF that will be responsible for responding to requests for MHS provider NPIs from non-MHS entities. Caution should be taken to distribute only that provider NPI data that is necessary in order to conduct healthcare transactions.
- Notify treatment facilities, MTFs and Dental Treatment Facilities, that NPI type 1 are currently available from Defense Medical Human Resource System internet (DMHRSi).
- Each Service will define its NPI reporting policies and procedures, to include who should have this level of DMHRSi access. Once determined, DMHRSi reporting access will be granted per the defined access procedures.

Provide instruction to MTFs that NPI type 1 will be available in the Composite Health Care System provider files as of May 2007.