

Ask the Contractor Teleconference

February 8, 2007

**Topic: National Provider Identifier (NPI)
Questions & Answers**

Contractor General Comment: Please note that the transcript of these questions was edited to allow for the greatest dissemination of information to the widest audience. CMS has a wealth of NPI information. For additional information including Questions and Answers posted on the CMS website, please visit <http://www.cms.hhs.gov/NationalProvIdentStand/> For the National Plan and Enumeration System, please visit: <https://nppes.cms.hhs.gov/NPPES/Welcome.do>

Question 1: Does item 32a of the revised CMS 1500 claim form require a NPI?

Answer 1: No. The instructions for item 32a indicate: Enter the NPI of the service facility as soon as it is available. This does not mean to always enter the NPI of the facility where services were rendered. Some services when billed to Medicare have required additional information to be reported in item 32. If you were not required to submit a legacy or facility # in item 32 of the old claim form, you will not submit a NPI on the revised form.

Question 2: Will there be surrogate NPIs? If a provider doesn't obtain a NPI because they are not a Medicare provider, what will they use?

Answer 2: Surrogate NPI #s will not exist. All HIPAA Covered Entities must obtain a NPI. At this time, CMS has not issued any instructions regarding Ordering/Referring Providers that are NOT HIPAA Covered Entities.

Question 3: How will NPIs be looked up?

Answer 3: CMS is working on the Date Dissemination process (UPIN Registry, crosswalk etc.). Once finalized, this information will be published in the Federal Registrar and on our website.

Question 4: Should a NPI be listed on a prescription pad?

Answer 4: NHIC, Corp. can not comment on what kind of information should be on prescription pads.

Question 5: Are NPI currently being accepted on electronic claims?

Answer 5: During the transition period (October 1, 2006-May 22, 2007) CMS recommends that during this period, claims be submitted using:

- The provider's legacy number such as Provider Identification Number (PIN); or
- Both the provider's NPI and legacy number

For additional information, please see the following MLN Matters articles on the CMS website

<http://www.cms.hhs.gov/MLNMattersArticles/downloads/SE0679.pdf>

<http://www.cms.hhs.gov/MLNMattersArticles/downloads/mm5378.pdf>

Question 6: When is the provider's NPI used and when is the group's NPI used?

Answer 6: If the provider has reassigned his benefits to the group, the provider's NPI will be used in item 24J of the revised CMS 1500 claim form and the group's NPI will be used in item 33a. If the provider has not reassigned his benefits, item 24J is left blank and the provider's NPI is indicated in item 33a.

Question 7: The MLN Matters article indicates that the revised CMS 1500 claim form is required February 1st. At today's ACT April 1st was indicated. Which date is correct?

Answer 7: The MLN Matters article has been revised. The revised CMS 1500 (08/05) form was effective January 1, 2007, but will be not mandated for use until April 2, 2007. For a copy of the revised MLN Matters article please visit the CMS website at: <http://www.cms.hhs.gov/MLNMattersArticles/downloads/MM5060.pdf>

Question 8: When will the State be implementing NPIs?

Answer 8: NPIs are a standard unique identifier for health care providers for all health plans. They are national. Health plans such as State programs may be implementing them differently and at separate times. As a health plan, Medicare began implementing them in October 2006.

Question 9: Do referring/ordering physicians have to release their NPIs?

Answer 9: Yes. Although the Date of Dissemination is still in process (see Q & A #3), providers are required to share their NPI as directed in the Final Rule. CMS instructs the following: *Share your NPI as needed. There are certain covered entities and others who will need to know your NPI in order to conduct standard transactions. These may include, but may not be limited to, your employer, hospitals where you have privileges, and health care providers to whom you refer patients. These health care providers cannot be reimbursed unless they know your NPI so that they can use it in the standard claims transactions that they conduct. Also, health plans in which you are enrolled and to whom you submit claims need to know your NPI; they need to associate it with your enrollment information in order to ensure you receive proper payment for service rendered.*

For additional information, please see the NPI Fact Sheet entitled *For Healthcare Providers Who Are Individuals* on the CMS website at:

http://www.cms.hhs.gov/NationalProvIdentStand/downloads/mpi_fs_hcprov_indiv_012606.pdf

Question 10: Does an NPI contain specialty or state information?

Answer 10: No. The NPI is a 10 digit, intelligence-free numeric identifier. Intelligence free means that the numbers do not carry information about health care providers, such as the state in which they practice or their provider type or specialization..

Question 11: Is each NPI attached to a tax id#? What about providers who work for other providers under a 1099 contract arrangement?

Answer 11: Every individual will have a type I NPI #. Question came from Illinois. Caller encouraged to talk to the Medicare contractor that handles IL.

Question 12: What date is the NPI required on paper claims?

Answer 12: Revised CMS 1500 Claim Form effective January 1st. Mandated to be used by April 2nd. If using the revised 1500 claim form, CMS recommends that through May 22, 2007, claims be submitted using:

- The provider's legacy number such as Provider Identification Number (PIN); or
- Both the provider's NPI and legacy number

Starting May 23rd 2007 and after

- Only NPI numbers

Question 13: When applying for NPI online, is a sole proprietor an individual (Type I) or an organization (Type II)?

Answer 13: As defined in the Final NPI Rule and according to CMS, a sole proprietor/sole proprietorship is an individual and is eligible for a single NPI. The sole proprietor must apply for the NPI using his/her own SSN. Not an EIN even if he/she has an EIN. Because a sole proprietor/sole proprietorship is an individual, he/she cannot be a subpart and cannot designate subparts.

Question 14 What is same name, same tax id, but different locations apply?

Answer 14: Health care providers that are organizations that comprise of components needs to determine if subparts exist.

For additional information regarding Subparts, see the NPI Fact Sheet entitled *Guidance on Subpart Determination for Medicare Organization Providers who Are Covered Entities under HIPAA* and the MLN Matters article SE0608-Medicare Policy on Subpart Designation on the CMS website at the following links:

http://www.cms.hhs.gov/NationalProvIdentStand/downloads/mpi_fs_subparts_032106.pdf

<http://www.cms.hhs.gov/MLNMattersArticles/downloads/se0608.pdf>

Question 15: If an individual is incorporated and has an existing group number, will they have a type I and a type II number?

Answer 15: See answer to question 13.

Question 16: **When sharing the NPI, should the individual NPI and group NPI be given out?**

Answer 16: Just the individual NPI needs to be shared.

Question 17: **We are billing agency for 911 Ambulance claims. We currently use a surrogate UPIN of FLF000 for the hospital staff. What will we use in the future?**

Answer 17: Ambulance claims do not require a UPIN and FLF000 is not a surrogate UPIN. For claims requiring an ordering/referring provider, the NPI will be used.

Question 18: **With UPINs going away, how will we be informed of our numbers?**

Answer 18: The NPI Enumerator will inform you of your NPI. The Medicare Enrollment process has not changed. Providers enrolling with Medicare will continue to receive a Welcome Letter from our Provider Enrollment department.