

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Medicare & Medicaid Services



..... **NPI: What You Need to Know**



A National Provider Identifier (NPI) is a unique identification number for covered health care providers, created to improve the efficiency and effectiveness of electronic transmission of health information. The Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) required the adoption of a standard, unique health identifier for each health care provider. The NPI Final Rule, published on January 23, 2004, established the NPI as this standard. Covered entities under HIPAA must use NPIs to identify health care providers in HIPAA standard transactions. This fact sheet answers the following questions to help you become more familiar with the NPI:

- What is an NPI?
- Who **may** obtain an NPI?
- Who **must** obtain an NPI?
- Who **may not** obtain an NPI?
- What are the health care provider NPI categories?
- How do you apply for an NPI?
- Where can you find resources with additional information?

Please note: The information in this publication applies to all HIPAA-covered entities.

A HIPAA-covered entity is a:

- Health care provider that conducts certain transactions in electronic form;
- Health care clearinghouse; or
- Health plan (including commercial plans, Medicare, and Medicaid).

What Is an NPI?

An NPI is a 10-digit numeric identifier. It does not carry information about you, such as the State where you practice, your provider type, or your specialization. Your NPI will not change, even if your name, address, taxonomy, or other information changes.

In HIPAA standard transactions, the NPI must be used in place of other provider identifiers, such as a Provider Transaction Access Number (PTAN), Online Survey Certification & Reporting (OSCAR), and National Supplier Clearinghouse (NSC).

Benefits of an NPI

Benefits of an NPI include:

- Simple electronic transmission of HIPAA standard transactions;
- Standard unique health identifiers for health care providers, health care plans, and employers; and
- Efficient coordination of benefit transactions.

What an NPI Doesn't Do

Obtaining an NPI will not:

- Change or replace your current Medicare enrollment or certification process;
- Enroll you in a health plan;
- Ensure you are licensed or credentialed;
- Guarantee payment by a health plan;
- Require you to conduct HIPAA transactions; or
- Turn you into a covered provider.



What Are HIPAA Standard Transactions?

HIPAA standard transactions are exchanges involving the transfer of information between two parties for specific purposes. HIPAA regulations established the following standard transactions for Electronic Data Interchange (EDI) of health care data:

- Claims and encounter information;
- Claims status;
- Coordination of benefits and premium payment;
- Eligibility, enrollment, and disenrollment;
- Payment and remittance advice; and
- Referrals and authorizations.

For more information, visit <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/TransactionCodeSetsStands> on the Centers for Medicare & Medicaid Services (CMS) website.

Who May Obtain an NPI?

All health care providers (that is, physicians, suppliers, hospitals, and others) may obtain an NPI. Health care providers are individuals or organizations that render health care as defined in 45 Code of Federal Regulations (CFR) 160.103. For more information, refer to 45 CFR 160.103 at <http://www.gpo.gov/fdsys/pkg/CFR-2013-title45-vol1/pdf/CFR-2013-title45-vol1-sec160-103.pdf> on the Government Printing Office (GPO) website.

Do You Need an NPI to Enroll in Medicare?

Yes. If you apply for enrollment in Medicare, you must have an NPI and furnish it on your enrollment application. An enrollment application without an NPI will be rejected.

Who Must Obtain an NPI?

All health care providers who are HIPAA-covered entities, whether individuals or organizations, must obtain an NPI.

Under HIPAA, you are a covered health care provider if you electronically transmit health information in connection with a HIPAA standard transaction, even if you use a business associate to do so. For more information and to access a tool to help you determine whether you are a covered entity, visit <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/HIPAAGenInfo/AreYouaCoveredEntity.html> on the CMS website.

Table 1 provides examples of common health care providers who are HIPAA-covered entities.



How Do You Find an NPI?

The National Plan and Provider Enumeration System (NPPES) assigns NPIs, maintains and updates information about health care providers with NPIs, and disseminates the NPI Registry and NPPES Downloadable File.

The NPI Registry is an online query system that allows users to search for a health care provider's information. To access the NPI Registry, visit <https://nppes.cms.hhs.gov/NPPESRegistry/NPIRegistryHome.do> on the Internet.

The NPPES Downloadable File contains disclosable information about health care providers with NPIs. To download the current file, visit <http://nppes.viva-it.com/NPIFiles.html> on the Internet.

For more information about NPPES data dissemination, visit <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProvidentStand/DataDissemination.html> on the CMS website.

Table 1. Health Care Providers Who Are HIPAA-Covered Entities

| Individuals* | Organizations |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Examples of individual HIPAA-covered entity health care providers include:</p> <ul style="list-style-type: none"> ◦ Chiropractors; ◦ Dentists; ◦ Nurses; ◦ Pharmacists; ◦ Physical Therapists; and ◦ Physicians. | <p>Examples of organization HIPAA-covered entity health care providers include:</p> <ul style="list-style-type: none"> ◦ Ambulance Companies; ◦ Clinics; ◦ Group Practices; ◦ Health Maintenance Organizations (HMOs); ◦ Home Health Agencies (HHAs); ◦ Hospitals; ◦ Laboratories; ◦ Nursing Homes; ◦ Pharmacies; ◦ Residential Treatment Centers; and ◦ Suppliers of Durable Medical Equipment (DME). |

* Students, interns, and residents are also eligible and must apply for an NPI.

Who May Not Obtain an NPI?

Any entity that does not meet the definition of a health care provider as defined in 45 CFR 160.103 may not apply for an NPI. Such entities include billing services, value-added networks, repricers, health plans, health care clearinghouses, non-emergency transportation services, and others.

What Are the Health Care Provider NPI Categories?

There are two categories of health care providers for NPI enumeration purposes: Entity Type 1 (Individual) and Entity Type 2 (Organization).

Entity Type 1: Individual Health Care Providers, Including Sole Proprietors

Individual health care providers may receive NPIs as Entity Type 1. As a sole proprietor, you must apply for the NPI using your own Social Security Number (SSN), not an Employer Identification Number (EIN) even if you have an EIN.



As a sole proprietor, you may receive only one NPI, just like any other individual. For example, if a physician is a sole proprietor, the physician may receive only one NPI (the individual's NPI). The following factors do not affect whether a sole proprietor is an Entity Type 1:

- Number of different office locations;
- Whether you have employees; and
- Whether the Internal Revenue Service (IRS) issued an EIN to you so your employees' W-2 forms can reflect the EIN instead of your Taxpayer Identification Number (which is your SSN).

NOTE: A sole proprietor is not an incorporated individual because the sole proprietor did not form a corporation. If you are a sole practitioner or solo practitioner, it does not necessarily mean you are a sole proprietor, and vice versa.

Entity Type 2: Organization Health Care Providers

Organization health care providers are group health care providers and are eligible for NPIs as Entity Type 2. Organization health care providers may have a single employee or thousands of employees. For example, an incorporated individual may be the only health care provider employed by that organization provider (the corporation that he or she formed).

Some organization health care providers are made up of components that function somewhat independently from their "parent" organization. These components may furnish different types of health care or have separate physical locations where health care is furnished. These components and their physical locations are not themselves legal entities, but are part of the organization health care provider (which is a legal entity). The NPI Final Rule refers to the components and locations as subparts.



What If You Are an Individual, Incorporated Health Care Provider?

If you are an individual who is a health care provider and who is incorporated, you may need to obtain an NPI for yourself (Entity Type 1) and an NPI for your corporation or LLC (Entity Type 2).

An organization health care provider can get its subparts their own NPIs. If a subpart conducts any HIPAA standard transactions on its own (that is, separately from its parent), it must obtain its own NPI.

Subpart determination ensures that entities within a covered organization are uniquely identified in HIPAA standard transactions they conduct with Medicare and other covered entities. For example, a hospital offers acute care, laboratory, pharmacy, and rehabilitation services. Each of these subparts may require its own NPI because each one sends its own standard transactions to one or more health plans.

NOTE: Subpart delegation does not affect Entity Type 1 health care providers. As individuals, these health care providers cannot designate subparts, and cannot be considered subparts.

How Do You Apply for an NPI?

Health care providers may apply for an NPI in one of three ways:

Option 1: Apply through a web-based application process. Visit the National Plan and Provider Enumeration System (NPPES) at <https://nppes.cms.hhs.gov/NPPES/Welcome.do> on the CMS website. Individual providers must create a username and password through the Identity & Access Management (I&A) System, and log in to NPPES using that username and password.

Option 2: Complete, sign, and mail a paper application to the NPI Enumerator address listed on the form. For a copy of the application (Form CMS-10114, “NPI Application/Update Form”), refer to <http://www.cms.gov/Medicare/CMS-Forms/CMS-Forms/Downloads/CMS10114.pdf> on the CMS website. To request a hard copy application through the NPI Enumerator, call 1-800-465-3203 or TTY 1-800-692-2326, or send an email to customerservice@npienumerator.com.

Option 3: Give permission to an Electronic File Interchange Organization (EFIO) to submit application data through bulk enumeration process. For more information on this option, see below or visit <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProvIdentStand/apply.html> on the CMS website.



What Must Covered Organizations Do When Applying for an NPI?

An organization health care provider that is a HIPAA-covered health care provider must:

- Obtain an NPI;
- Determine if it has subparts and if those subparts need to have their own NPIs;
- Ensure its subparts that need to have their own NPIs do so by either obtaining the NPIs for them or instructing the subparts to obtain their NPIs themselves; and
- Ensure the subparts comply with the NPI Final Rule requirements placed on HIPAA-covered health care providers.



Electronic File Interchange (EFI)

EFI is an alternative process for health care providers applying for an NPI. Each EFIO can submit NPI application information for hundreds or even thousands of health care providers all at one time in a single electronic file or in a series of electronic files.

EFI benefits both the health care providers and CMS. By allowing an EFIO to apply on its behalf, a health care provider itself does not have to apply for an NPI. This saves the health care provider time and resources. CMS benefits by saving the time and resources it would have expended if the NPI Enumerator (contractor that processes NPI applications) and the web-based system had to process NPI applications one at a time.

In addition to obtaining NPIs for health care providers, some EFIOs may also send changes or updates to the NPPES on behalf of enumerated health care providers to keep the providers' NPPES records current. To send changes or updates the EFIO needs to get the permission of the health care providers. Whether or not to furnish changes or updates to a health care provider's NPPES record is a decision made between an EFIO and its associated health care providers.

For more information, visit <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProviderStand/efi.html> on the CMS website.



Important!

If the provider and EFIO agree for the EFIO to submit future changes on the provider's behalf, it is still ultimately the provider's responsibility to ensure that any updated information is furnished to the NPI Enumerator.

Resources

For more information about the NPI, visit <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProvIdentStand> on the CMS website, or scan the Quick Response (QR) code on the right with your mobile device. Table 2 provides resources for additional information.

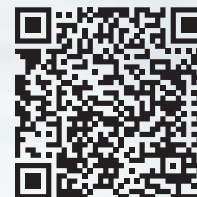


Table 2. Resources

| Resource | Website |
|-------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CMS NPI Enumerator Contact Information | Telephone: 1-800-465-3203 (NPI Toll-Free) 1-800-692-2326 (NPI TTY) Email: customerservice@npienumerator.com |
| CMS NPI Frequently Asked Questions | https://questions.cms.gov/faq.php?id=5005&rtopic=1851 |
| Data Dissemination | http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProvIdentStand/DataDissemination.html |
| EFI | http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProvIdentStand/efi.html |
| HIPAA-Covered Entity | http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/HIPAAGenInfo/AreYouaCoveredEntity.html |
| HIPAA EDI Standards Web-Based Training Course | http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/WebBasedTraining.html |
| I&A System | https://nppes.cms.hhs.gov/IAWeb/register/startRegistration.do |
| Medicare Learning Network® (MLN) Matters® Article SE0751: Clarification on the National Provider Identifier (NPI) Enumerator’s Responsibilities | http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/Downloads/SE0751.pdf |

Table 2. Resources (cont.)

| Resource | Website |
|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Medicare NPI Implementation and Expectations on Determination of Subparts | http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProviderStand/implementation.html |
| Medicare Provider-Supplier Enrollment: National Education Products | http://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/MedicareProviderSupEnroll/Downloads/Medicare_Provider-Supplier_Enrollment_National_Education_Products.pdf |
| NPPES | https://nppes.cms.hhs.gov/NPPES/Welcome.do |
| “Streamlined Access to PECOS, EHR, and NPPES” MLN Connects™ National Provider Call | http://www.cms.gov/Outreach-and-Education/Outreach/NPC/National-Provider-Calls-and-Events-Items/2013-11-15-NPC.html |



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