Physicians and Non-Physician Practitioners Reported on Part A Critical Access Hospital (CAH) Claims

Provider Types Affected

This MLN Matters® Article is intended for Critical Access Hospitals (CAHs), Method II providers submitting claims to Medicare Administrative Contractors (MACs) for services provided to Medicare beneficiaries.

Provider Action Needed

This is a reminder that CAHs, Method II claims submitted to Medicare must contain an attending or rendering physician or non-physician practitioner who has a valid National Provider Identifier (NPI), is of an eligible specialty, and is enrolled in Medicare in an approved status. Failure to list a physician or non-physician practitioner, in the attending or referring fields that meet the above requirements will result in the rejection of the CAH Methods II claim.

Background
All Health Insurance Portability and Accountability Act of 1996 (HIPAA) covered entities (except small health plans), including enrolled Medicare providers and suppliers that are covered entities, are required to obtain an NPI and to use their NPI to identify themselves as “health care providers” in the HIPAA standard transactions that they conduct with Medicare and other covered entities.

Every provider or supplier that submits an enrollment application must furnish its NPI(s) in the applicable section(s) of the Form CMS-855. The Centers for Medicare & Medicaid Services (CMS) has implemented edits that verify that the NPI reported for physicians or non-physician practitioners in the attending or rendering physician fields on CAH Method II claims for payment has a valid NPI and that the provider for that NPI is enrolled in Medicare in an approved status, otherwise the claim will be rejected. If the physician or non-physician practitioner is not enrolled in Medicare, he/she will need to establish an enrollment record in the Provider Enrollment Chain and Ownership System (PECOS) with a valid NPI. He/she may submit their enrollment application electronically using the Internet-based Provider Enrollment, Chain, and Ownership System (PECOS) located at https://pecos.cms.hhs.gov/pecos/login.do or by completing the paper CMS-855I or CMS- 855O application, which is available at http://www.cms.gov/Medicare/CMS-Forms/CMS-Forms/List.html on the CMS website. Note that an application fee is not required as part of the physician's or non-physician practitioner's application submission.

Only physicians and certain types of non-physician practitioners are eligible as attending or rendering providers on CAH Method II claims. Those providers are as follows:

- Doctor of medicine or osteopathy;
- Dental Surgery;
- Podiatric Medicine;
- Optometry;
- Chiropractic Medicine;
- Physician Assistant;
- Certified Clinical Nurse Specialist;
- Nurse Practitioner;
- Clinical Psychologist;
- Certified Nurse Midwife;
- Licensed Clinical Social Worker;
- Certified Registered Nurse Anesthetist; and
- Registered Dietitian/Nutritional Professional.

If the attending or rendering provider is listed on the claim, the edits will compare the first four letters of the provider’s last name and validate that the physician or non-physician practitioner is enrolled in Medicare with a valid NPI. If the provider’s enrollment status cannot be validated the claim will be rejected with the following Claim Adjustment Reason Codes:
- N253 - Missing/incomplete/invalid attending provider primary identifier, and
- N290 - Missing/incomplete/invalid rendering provider primary identifier.

### Additional Information

To assist providers, CMS provides an attending and rendering file that identifies those physicians and non-physician practitioners who are of a specialty type that is eligible to be listed as an attending or rendering provider on CAH Method II claims and is enrolled in Medicare in an approved status.

When submitting the CMS-1500 or the CMS-1450, please only include the first and last name as it appears on the attending and rendering file available at https://data.cms.gov on the CMS website. Middle names (initials) and suffixes (such as MD, RPNA etc.) should not be listed in the attending/rendering fields.

### Document History

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<td>September 24, 2015</td>
<td>This article was revised to change the link to the Ordering Referring Report on page 3. That link was changed to <a href="https://data.cms.gov">https://data.cms.gov</a> on the CMS website.</td>
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