

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



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## NPI: Guidance for Organization Health Care Providers Who Apply for National Provider Identifiers (NPIs) for Their Health Care Provider Employees

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CMS offers the following guidance for organization health care providers who wish to apply for NPIs or submit updates to the National Plan and Provider Enumeration System (NPPES), using the NPPES web-based process, on behalf of their employed health care providers. The process described below is **NOT** the process for Electronic File Interchange (EFI) for bulk enumeration. Instead, it is the steps an organization that is a health care provider should take when applying for an employee's NPI, on an individual record-by-record basis.

### (1) Confirm NPI Status

Ensure that the health care providers for whom the organization will be applying for NPIs do not already have NPIs.

### (2) Verify Agreement With Health Care Providers

Determine if there is an existing agreement between the organization health care provider and its health care provider employees that gives the organization the appropriate legal authority to act on behalf of those health care providers in taking actions such as completing NPI application and update transactions on their behalf. Legal counsel may be necessary to determine if an existing agreement covers these types of actions. If such an agreement exists, it may not be necessary for the organization to have to take the actions described in items 3-5 below.

### (3) Notify Health Care Providers of Collected Information

Ensure that the health care providers are aware of the provider information being collected on the NPI Application/Update Form (CMS-10114), available from <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProvidentStand/apply.html>, and that they have read the parts of that form containing the "Penalties for Falsifying Information on the National Provider (NPI) Application/Update Form," the "Certification Statement," and the "Privacy Act Statement," and agree to any requirements therein.

### (4) Validate NPI Application Data

Share with the health care providers the NPI application data that will be furnished on their behalf in the web-based application to ensure the data are complete and correct. The same would apply to update information.

### (5) Retain NPI Documents

Ask the health care providers to sign a document that indicates that the above actions were taken, and retain those documents in files as proof that the health care providers were aware of the actions taken on their behalf.

## (6) Designate Contact Person for NPI Confirmation

The NPPES sends an e-mail to the “Contact Person” whose name and e-mail address are entered on a health care providers’ NPI application that is submitted over the Internet. This e-mail is the NPI notification that informs the Contact Person of the enumerated health care provider’s NPI, and contains some of the identifying information about the enumerated health care provider (including provider name, address, and Healthcare Provider Taxonomy Code and description). If the organization submits an NPI application on behalf of a health care provider whom it employs, the Contact Person as designated by the organization when completing the web-based application will receive the NPI notification e-mail from the NPPES. The Contact Person, upon receipt of that NPI notification, must ensure that he/she forwards that NPI notification, or a copy of it, to the health care provider. The NPI notification not only contains the NPI, but is the confirmation that the health care provider has been assigned an NPI.

Organization health care providers may feel it appropriate to have their legal counsel review this process.



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