

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



## NPI: Guidance for Organization Health Care Providers Who Apply for NPIs for Their Health Care Provider Employees



 **Please note:**

The information in this publication applies to all organization health care providers who are 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).

The National Provider Identifier (NPI) is a Health Insurance Portability and Accountability Act (HIPAA) Administrative Standard. An NPI is a unique identification number for covered health care providers, created to improve the efficiency and effectiveness of electronic transmission of health information. Covered health care providers and all health plans and health care clearinghouses must use NPIs in their administrative and financial transactions.

The Centers for Medicare & Medicaid Services (CMS) developed the National Plan and Provider Enumeration System (NPPES) to assign these unique identifiers. For more information on how to apply for an NPI, visit <https://nppes.cms.hhs.gov/NPPES/Welcome.do> on the CMS website.

This fact sheet provides guidance for organization health care providers who wish to apply for NPIs or submit updates to the NPPES on behalf of their employed health care providers.

**NOTE:** The process on page 2 is **NOT** the process for Electronic File Interchange (EFI) for bulk enumeration. Instead, an organization that is a health care provider should follow these steps when applying for an employee's NPI on an individual record-by-record basis.



## **1 CONFIRM EMPLOYEE'S CURRENT NPI STATUS**

Ensure the health care providers for whom the organization will apply do not already have NPIs.

## **2 VERIFY AGREEMENT WITH HEALTH CARE PROVIDER EMPLOYEES**

Determine if an agreement exists between the organization health care provider and its health care provider employees that give the organization the appropriate legal authority to act on behalf of those health care providers in taking actions such as completing NPI applications and updating transactions on their behalf. You may need legal counsel 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 take the actions described in items 3–5 below.

## **3 NOTIFY HEALTH CARE PROVIDER EMPLOYEES OF COLLECTED INFORMATION**

Ensure the health care providers know about the information collected on the NPI Application/Update Form (CMS-10114) available at <http://www.cms.gov/Medicare/CMS-Forms/CMS-Forms/Downloads/CMS10114.pdf> on the CMS website. Ensure they read the “Penalties for Falsifying Information on the National Provider Identifier (NPI) Application/Update Form,” “Certification Statement,” and “Privacy Act Statement” sections of that form and agree to all relevant requirements.

## **4 VALIDATE NPI APPLICATION DATA**

Share the NPI application data with the health care providers represented in the application to ensure complete and correct data. The same applies to updating information.

## **5 RETAIN NPI DOCUMENTS**

Ask the health care providers to sign a document indicating that you took the above actions, and retain those documents as proof the health care providers knew about the actions taken on their behalf.

## **6 DESIGNATE CONTACT PERSON FOR NPI CONFIRMATION**

The NPPES sends an email to the “Contact Person” entered on a health care provider’s NPI application. This email informs the Contact Person of the enumerated health care provider’s NPI, and contains some of the identifying information about the 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 employee, the Contact Person designated by the organization receives the NPI notification email from the NPPES. The Contact Person must forward that NPI notification (or a copy) to the health care provider employee. This notification confirms that the NPPES assigned the health care provider employee an NPI and contains the NPI.

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

# Resources

For more information about the NPI, visit <http://www.cms.gov/Regulations-and-Guidance/HIPAA-Administrative-Simplification/NationalProviderStand> on the CMS website, or scan the Quick Response (QR) code on the right with your mobile device. Table 1 provides resources for additional information.



**Table 1. Resources**

Resource	Website
"NPI: What You Need to Know" booklet	<a href="http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/MLN-Publications-Items/CMS1232538.html">http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/MLN-Publications-Items/CMS1232538.html</a>
NPES	<a href="https://nppes.cms.hhs.gov/NPPES/Welcome.do">https://nppes.cms.hhs.gov/NPPES/Welcome.do</a>
PECOS Identity and Access Management (I&A) System	<a href="https://pecos.cms.hhs.gov/pecos/PecosIAConfirm.do?transferReason=CreateLogin">https://pecos.cms.hhs.gov/pecos/PecosIAConfirm.do?transferReason=CreateLogin</a>
"Provider Specific Medicare Resources" Medicare Learning Network® (MLN) Guided Pathways (GPs)	<a href="http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNEdWebGuide/Downloads/Guided_Pathways_Provider_Specific_Booklet.pdf">http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNEdWebGuide/Downloads/Guided_Pathways_Provider_Specific_Booklet.pdf</a>
"Streamlined Access to PECOS, EHR, and NPES" MLN Connects™ National Provider Call	<a href="http://www.cms.gov/Outreach-and-Education/Outreach/NPC/National-Provider-Calls-and-Events-Items/2013-11-15-NPC.html">http://www.cms.gov/Outreach-and-Education/Outreach/NPC/National-Provider-Calls-and-Events-Items/2013-11-15-NPC.html</a>



This fact sheet was current at the time it was published or uploaded onto the web. Medicare policy changes frequently so links to the source documents have been provided within the document for your reference.

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