

MOA MEMBERS

FROM SUE A. WEINGARTNER, EXECUTIVE DIRECTOR

AUGUST 10, 2009

NATIONAL PLAN AND PROVIDER ENUMERATION SYSTEM (NPPES) UPDATE ANNOUNCEMENT FOR PHYSICIANS

Members: You might be interested to look up your name in the NPI registry to see how much of your information is publicly available, and whether the information is accurate.

PHYSICIANS!

Did an academic medical institution or university obtain your NPI for you?

If so, is your NPPES record up to date?

Health care providers, including physicians, began applying for National Provider Identifiers (NPIs) on May 23, 2005. Since then, the National Plan and Provider Enumeration System (NPPES) has assigned nearly 3 million NPIs. More than 700,000 NPIs have been assigned to physicians.

Many physicians were assigned their NPIs upon their graduation from medical school. Often, the administrative staff at the physicians' academic medical centers or universities applied for the physicians' NPIs. The administrative staff handled similar actions for their new physicians and had, in their records, all the information that needed to be furnished on the application for an NPI. Some of these NPIs may have been assigned as long as 4 years ago.

The Centers for Medicare & Medicaid Services (CMS) is required by regulation to make available to the public certain information about health care providers that is contained in their NPPES records. This information includes the name, provider type (e.g., physician), business practice location address, business mailing address, and business practice location telephone number. Publicly available NPPES information can be found in the NPI Registry, a query-only database which anyone can access on the Internet (<https://nppes.cms.hhs.gov/NPPES/NPIRegistryHome.do>), and in a monthly downloadable file that individuals with the necessary technical expertise can download from the Internet (http://nppesdata.cms.hhs.gov/CMS_NPI_files.html). Health plans, health care clearinghouses, health care providers, and others with a need to know can easily use the NPI Registry to view data for a particular health care provider simply by entering the health care provider's name or NPI. The downloadable file is used primarily by health plans and other large health industry organizations that need information for all or most of the health care providers who have NPIs and who may need to sort or otherwise manipulate the data in the file to suit their business needs.

Now, months or years later, many of the physicians whose academic medical centers or universities obtain their NPIs for them have moved on in their careers to new locations.

Many have not updated their NPPES information to show new business practice location addresses, business mailing addresses, or business practice location telephone numbers. As a result, the information in the NPI Registry and in the downloadable file is out of date. Academic medical centers and universities whose addresses and telephone numbers were entered into NPPES as the business practice locations, business mailing addresses, and business practice location telephone numbers for the physicians who they formerly employed are now being burdened with the receipt of mail and telephone calls for physicians who are no longer there.

It is not the responsibility of the academic medical centers or the universities to continue to update the NPPES records of physicians who are no longer working for them. In most cases, the academic medical centers and universities do not have the updated information and, therefore, are unable to contact the physicians to ask that they update their NPPES information.

Unless physicians have agreements in place for others to keep their NPPES information up to date, the physicians themselves are responsible for ensuring that their NPPES records contain accurate and current information.

Some of these physicians may have enrolled in health plans and may be sending claims electronically to health plans or conducting other electronic health transactions with health plans. These physicians are “covered entities” under the Health Insurance Portability and Accountability Act (HIPAA). As covered entities, they are required by regulation to update their NPPES records within 30 days of any change. Those who have NPIs but who do not conduct electronic health transactions with health plans, and, thus, are not covered entities, are encouraged to keep their NPPES information up to date.

We remind all health care providers who have NPIs, not just the physicians specially noted above, to view their NPPES records and, if corrections are necessary, to furnish the updates. Health care providers who established User IDs and passwords in NPPES can easily access their NPPES records to make updates. Those who did not establish User IDs and passwords may do so at any time. For assistance in setting up User IDs and passwords, or in situations where the User ID or password has been forgotten, health care providers should contact the NPI Enumerator at 1-800-465-3203. If they prefer, health care providers may furnish their updates by filling out the paper NPI application (Form CMS-10114) and mailing the completed form to the NPI Enumerator. The instructions are on the form, along with the mailing address of the NPI Enumerator. The form may be downloaded from the CMS forms web page (www.cms.hhs.gov/cmsforms) or one may be obtained by contacting the NPI Enumerator at the number above.