

June 22 , 2007

National Provider Identifier Information Is Scheduled for June 28 Release What You Need to Know and Do Now

June 22, 2007 -- The Centers for Medicare and Medicaid Services (CMS) recently published a notice in the Federal Register indicating that the agency plans to make some of the information that providers submitted in their National Provider Identifier (NPI) application available to the public beginning on June 28. The federal agency believes it has an obligation under the Freedom of Information Act to make this information publicly accessible. However, this is the first time in the very long NPI process that CMS' intention to make information publicly available in this manner was made known.

The information that CMS plans to make available includes: your NPI; your name(s); your business location address, fax and phone; your business mailing address, fax and phone; your taxonomy code(s); your other provider identifier(s); your gender; the date you obtained your NPI; the date you last updated your NPI; and your license number. Some of this information is considered "optional" by CMS. **You may exclude any "optional information" (see list below) from your completed NPI application, and doing so by June 28 will prevent its public release by CMS.**

Importantly, CMS will **not release** certain private information such as Social Security Numbers (SSN), Tax Identification Numbers, date of birth, or e-mail addresses. Some practitioners had expressed concern that CMS would release additional personal information not requested in the NPI application, such as home address. CMS does not plan to release to the public any information that is not contained in the NPI application.

CMS just posted on its Web site a list of the NPI information to be disclosed, as well as the information considered "optional." You may find the list online by accessing www.cms.hhs.gov/nationalprovidentstand/, clicking on "Data Dissemination" on the left hand side of the page, and then clicking on "Information on FOIA-Disclosable Data Elements in NPPES" in the "Downloads" section near the bottom of the page.

The items below as listed on the NPI application are the ones considered "optional" at this time:

- Other last, first and middle name (if you listed more than one name)
- Prefix, suffix, and credential
- Fax and phone numbers in the business mailing address category
- Fax number in the business location category
- All but one taxonomy code
- Other provider identifiers

- Other provider identifier type code

The APA Practice Organization (APAPO) encourages members to review the information they submitted on their NPI application to make sure it is accurate. Practitioners who act now also have the opportunity to remove information from their NPI application that CMS considers "optional."

CMS' current plan is to have a "Look Up" program on the Internet where people can type in a provider's name and gain access to that provider's NPI information. The Web location for this program had not been identified as of June 21. CMS also plans to make information available in a downloadable file, thereby allowing entities to download the entire NPI database. The federal agency further intends to make available monthly updates of the information in separate files.

Practitioners can check the accuracy of the NPI information currently stored under their name by going online to <https://nppes.cms.hhs.gov/> and clicking on "National Provider Identifier." If you applied for your NPI electronically, you would then click on "Login" to review and update your information as necessary, using the user ID and password you created when you applied. If you applied for your NPI using a paper form, you would begin by clicking on "Create Login to View or Update Your NPI Data."

In the process of checking your NPI application for accuracy, be advised that a CMS representative has informed us that many providers inadvertently put their SSN in fields other than the field for this number. **Practitioners should ensure that their SSN appears only in the field requesting the SSN since this field will not be released to the public.** Further, the NPI application requests only your business address, not your home address, so you may want to make sure that you did not inadvertently include your home address on the application.

The APAPO has urged CMS to delay the June 28 deadline. The short notice period afforded by CMS makes it unrealistic for millions of providers to learn about this policy and to have an opportunity to update their information. Further, important details governing implementation of this new policy have not been clarified.

CMS has informed us that they are currently working on extending the June 28 deadline to give providers more time to review their NPI information. The agency will announce any extension on their NPI website:

<http://www.cms.hhs.gov/NationalProvIdentStand/> **Even so, the APA Practice Organization encourages you to act now in checking the accuracy of your NPI application information and in removing any "optional" information you may want to delete.**

The APAPO offers the following considerations when reviewing your "optional" NPI information:

- The provider identifier field, which reflects the identification numbers assigned to you by payers prior to the NPI, was included to make it easier for payers to link you to your NPI number. Including this information in the NPI database should reduce the chance of payment delays. If, however, your provider identifier was your Social Security Number, we recommend that you remove it, since a Social Security Number in this field would not be protected from public release. Further, some psychologists may have included their DEA number in the provider identifier field. Because providers are not required to submit their DEA, and including this number is unlikely to assist with payment, we recommend that you remove your

DEA if applicable to reduce any chance of fraudulent use.

- If you specifically decided to choose more than one taxonomy code, there is no reason to delete your taxonomy code information.

We will monitor the NPI information release closely during the initial phases of implementation to determine if it creates difficulties for psychologists. For example, the public availability of NPI information might make it easier for marketers to mail information to your business address. If we find that it does create problems, we will take appropriate action with CMS. Please assist us with the monitoring process by letting us know if you experience problems. You may send an email to our legal and regulatory affairs staff at praclegal@apa.org or call them at 202-336-5886.

The APA Practice Organization will continue to advise members of NPI-related developments in future issues of our *PracticeUpdate* e-newsletter and other communications.

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