

IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS BT201863 NOVEMBER 29, 2018

IHCP revises the NPI reporting requirements for enrolling providers

Effective January 1, 2019, the Indiana Health Coverage Programs (IHCP) will revise its National Provider Identifier (NPI) reporting requirements for healthcare providers enrolling with the IHCP. The IHCP will require healthcare providers to enroll using the type of NPI that aligns with the organizational structure under which the provider will be doing business with the IHCP, per their IHCP enrollment application. Alignment between the organizational structure, legal name, taxpayer identification number (TIN), and NPI type reported on IHCP provider enrollment paperwork will be required and verified.

All individuals and organizations that are healthcare providers doing business with the IHCP must obtain the proper type of NPI. There are two types of healthcare provider NPIs:

- Type 1 (individual) – A healthcare provider that is conducting business as an **individual** or as a **sole proprietor** must obtain a Type 1 NPI.
- Type 2 (organizational) – A healthcare provider that is conducting business as an **organization** or a distinct subpart of an organization, such as a group practice, a facility, or a corporation, including an **incorporated individual**, must also obtain a Type 2 NPI.

Note: A healthcare provider rendering healthcare services as an individual practitioner and also conducting business as an incorporated entity, must obtain a Type 1 NPI as a practitioner and also a Type 2 NPI as a corporation or limited liability company (LLC).

Beginning January 1, 2019, provider enrollment applications submitted to the IHCP must include the proper NPI type, based on the organizational structure of the enrolling individual or entity. For providers enrolling with the IHCP to bill for services (*Billing Provider* and *Group Provider* classifications), the organizational structure of the enrolling entity is determined by the information reported on the provider's IHCP enrollment application and on the Internal Revenue Service (IRS) *W-9* form submitted with the application. Providers under the *Rendering Provider* classification – that do not bill the IHCP directly – are not required to submit a *W-9* form; the organizational structure associated with rendering practitioners is considered to be "individual" in all instances.

The IHCP will validate with the National Plan and Provider Enumeration System (NPPES) that the NPI included on an enrollment application is the proper type – Type 1 or Type 2 – consistent with IHCP's revised requirements. Alignment of the NPI type, organizational structure, legal name, and TIN will be required and verified as follows:

- An **individual healthcare practitioner** who is enrolling with the IHCP to render services but who will not be billing the IHCP directly for his or her services must enroll with the IHCP using his or her **Type 1 NPI**:
 - A rendering provider must enroll using his or her **personal name** as the legal name on the enrollment.
 - A rendering provider must enroll using his or her **Social Security number (SSN)** as the unique identifier associated with the IHCP enrollment application.



*Note: Because the individual practitioner does not bill the IHCP directly for his or her services, he or she must enroll under the Rendering Provider classification and must be linked to one or more Group Providers to do business with the IHCP. **The individual practitioner must provide proof of his or her proper licensure or certification with his or her IHCP Rendering Provider enrollment application.***

Example: Jane Doe, nurse practitioner (NP), is employed by AA Medical Group. Her services are billed by and reimbursed to AA Medical Group. Ms. Doe enrolls with the IHCP as a Rendering Provider under the name Jane Doe, using her personal Type 1 NPI and is linked to AA Medical Group (enrolled with the IHCP as a Group Provider using the business' Type 2 NPI).

- An **individual healthcare practitioner** who is enrolling to bill the IHCP directly for his or her services and is conducting business with the IHCP as an **individual or sole proprietor** (including a single-member LLC electing to do business as an individual, referred to as a disregarded entity), must enroll using his or her **Type 1 NPI**:
 - The individual must enroll using his or her **personal name** as the legal name on the enrollment (even if the individual operates under a doing business as (DBA) designation).
 - The individual may use either his or her **SSN or an employer identification number (EIN)** as the TIN associated with the enrollment.
 - The legal name, TIN, and organizational structure on the *W-9* must match the same information reported on the IHCP enrollment application.

*Note: These individual practitioners should enroll under the Billing Provider classification. **The individual practitioner must provide proof of his or her proper licensure or certification with the IHCP enrollment application.** Billing Providers do not bill the IHCP for services rendered by other providers and do not have providers enrolled with the IHCP as Rendering Providers linked to their enrollments.*

Example: Dr. Bill Smith is a sole proprietor, operating under the DBA Smith Medical Office. He bills and is reimbursed directly for services he personally renders. Dr. Smith enrolls with the IHCP as a Billing Provider under the name Bill Smith (listing Smith Medical Office as his DBA designation) using his personal Type 1 NPI.

- An **individual healthcare practitioner** who is enrolling to bill for his or her services and who is conducting business with the IHCP as a **business entity** (C Corporation, S Corporation, Partnership, or an LLC (including a single-member LLC electing to do business as a corporation) must enroll the business using the business entity's **Type 2 NPI** and themselves using their personal **Type 1 NPI**:
 - The business entity must enroll using the **business name** as the legal name on the enrollment.
 - The business entity must use an **EIN** as the TIN associated with the enrollment.
 - The business' legal name, TIN, and organizational structure on its *W-9* must match the same information reported on the IHCP enrollment application.
 - The practitioner must enroll using his or her **personal name** as the legal name on an enrollment and his or her **SSN** as the TIN associated with the enrollment.

*Note: Individual healthcare practitioners who are conducting business with the IHCP using a Type 2 NPI (a business NPI) must enroll their business under the Group Provider classification and enroll themselves as a Rendering Provider with that group using their individual Type 1 NPI. **The individual practitioner must provide proof of his or her proper licensure or certification with his or her IHCP Rendering Provider enrollment application.***

Example: *Dr. Sue Jones is conducting business as a corporation, Jones Dental Services, LLC. She bills and is reimbursed for services she personally renders in the name of Jones Dental Services, LLC. Dr. Jones enrolls her business with the IHCP as a Group Provider under the name Jones Dental Services, LLC using the business' Type 2 NPI. She enrolls herself with the IHCP as a Rendering Provider under the name Sue Jones using her personal Type 1 NPI. Dr. Jones is linked as a rendering provider to the group Jones Dental Services. As a Group Provider, Jones Dental Services may have additional rendering providers linked to its IHCP enrollment.*

- An **organization** that is enrolling to bill for services and that is conducting business with the IHCP, as a **business entity** including a C Corporation, S Corporation, LLC, Partnership, and Trust/Estate, must enroll using the business entity's **Type 2 NPI**:
 - The business entity must enroll using the **business name** as the legal name on the enrollment.
 - The business entity must use an **EIN** as the TIN associated with the enrollment.
 - The legal name, TIN, and organizational structure on the *W-9* must match the same information reported on the IHCP enrollment application.

Note: An organization may enroll under the Billing Provider or Group Provider classification. An organization must enroll as a Billing Provider if it is not billing the IHCP for services rendered by individual rendering providers. An organization must enroll as a Group Provider if it is billing the IHCP for services rendered by one or more rendering providers. Individual rendering providers must provide proof of proper licensure or certification with their IHCP Rendering Provider enrollment applications.

Example 1: *ABC Medical Supply is a business entity conducting business as a C Corporation. The entity bills and is reimbursed for medical supplies in the name of ABC Medical Supply; there are no Rendering Providers (practitioners such as physicians, physician assistant, and so on) associated with the business. The business enrolls with the IHCP as a Billing Provider under the name ABC Medical Supply using the business' Type 2 NPI.*

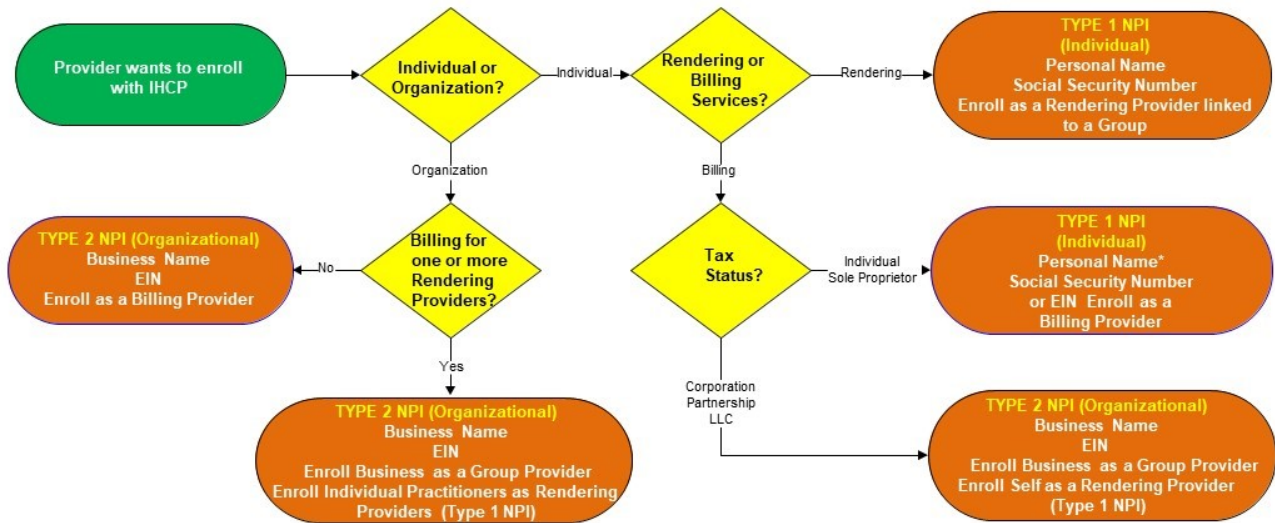
Example 2: *Main Street Medical Group is a business entity conducting business as a Partnership. The entity bills and is reimbursed for services rendered by employed physicians and nurse practitioners in the name of Main Street Medical Group. The business enrolls with the IHCP as a Group Provider using the business' Type 2 NPI. Each employed practitioner enrolls with the IHCP as a Rendering Provider under his or her personal name using his or her personal Type 1 NPIs. The practitioners are linked as rendering providers to the group Main Street Medical Group.*

A schematic illustration of the revised NPI and enrollment data reporting requirements is shown in [Figure 1](#) for additional clarification. Please note that the revised NPI reporting requirements and related guidance do not apply to atypical provider types, including waiver and transportation providers that are not required to have an NPI and do not use an NPI for billing the IHCP.

Providers currently enrolled with the IHCP will need to bring their enrollments into compliance with these revised NPI reporting requirements. Watch future IHCP publications for guidance on what will be required of existing providers.

Figure 1 – NPI reporting requirements revised process

Understanding the IHCP NPI Requirements



- NPI:**
- Type 1 (Individual)
 - Type 2 (Organizational)

- Legal Name:**
- Personal Name
 - Business Name

- Tax Identification:**
- Social Security Number (SSN)
 - Employer Identification Number (EIN)

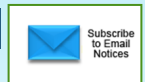
- Enrollment Classification:**
- Billing
 - Group (with Renderings attached)
 - Rendering

* The legal name on the enrollment is the personal name of the individual; a DBA may be used as the Service Location name.

QUESTIONS?

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