

# IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS    BT201905    FEBRUARY 7, 2019

## IHCP revises the NPI reporting requirements for existing providers during revalidation

Effective March 11, 2019, the Indiana Health Coverage Programs (IHCP) revised the National Provider Identifier (NPI) reporting requirements for healthcare providers revalidating with the IHCP. The IHCP will require healthcare providers to revalidate 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 revalidation 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. *Providers currently enrolled with the IHCP will need to bring their enrollments into compliance with these revised NPI reporting requirements during the revalidation process.*



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 March 11, 2019, provider enrollment revalidation applications submitted to the IHCP must include the proper NPI type, based on the organizational structure of the enrolling individual or entity. For providers revalidating 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 revalidation 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 revalidation 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 be enrolled using his or her **personal name** as the legal name on the enrollment.
  - A rendering provider must be enrolled 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 be enrolled 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 should be enrolled 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 enrolled 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 be enrolled using his or her **Type 1 NPI**:
  - The individual must be enrolled 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 be enrolled 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 should be enrolled 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 enrolled 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 have the business enrolled using the business entity's **Type 2 NPI** and themselves using their personal **Type 1 NPI**:
  - The business entity must be enrolled 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 be enrolled 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.***

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**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 must have her business enrolled with the IHCP as a Group Provider under the name Jones Dental Services, LLC using the business' Type 2 NPI. She must have herself enrolled 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.*

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- An **organization** that is enrolled 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 be enrolled using the business entity's **Type 2 NPI**:
  - The business entity must be enrolled 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 be enrolled under the Billing Provider or Group Provider classification. An organization must be enrolled as a Billing Provider if it is not billing the IHCP for services rendered by individual rendering providers. An organization must be enrolled 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.***

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**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 must be enrolled with the IHCP as a Billing Provider under the name ABC Medical Supply using the business' Type 2 NPI.*

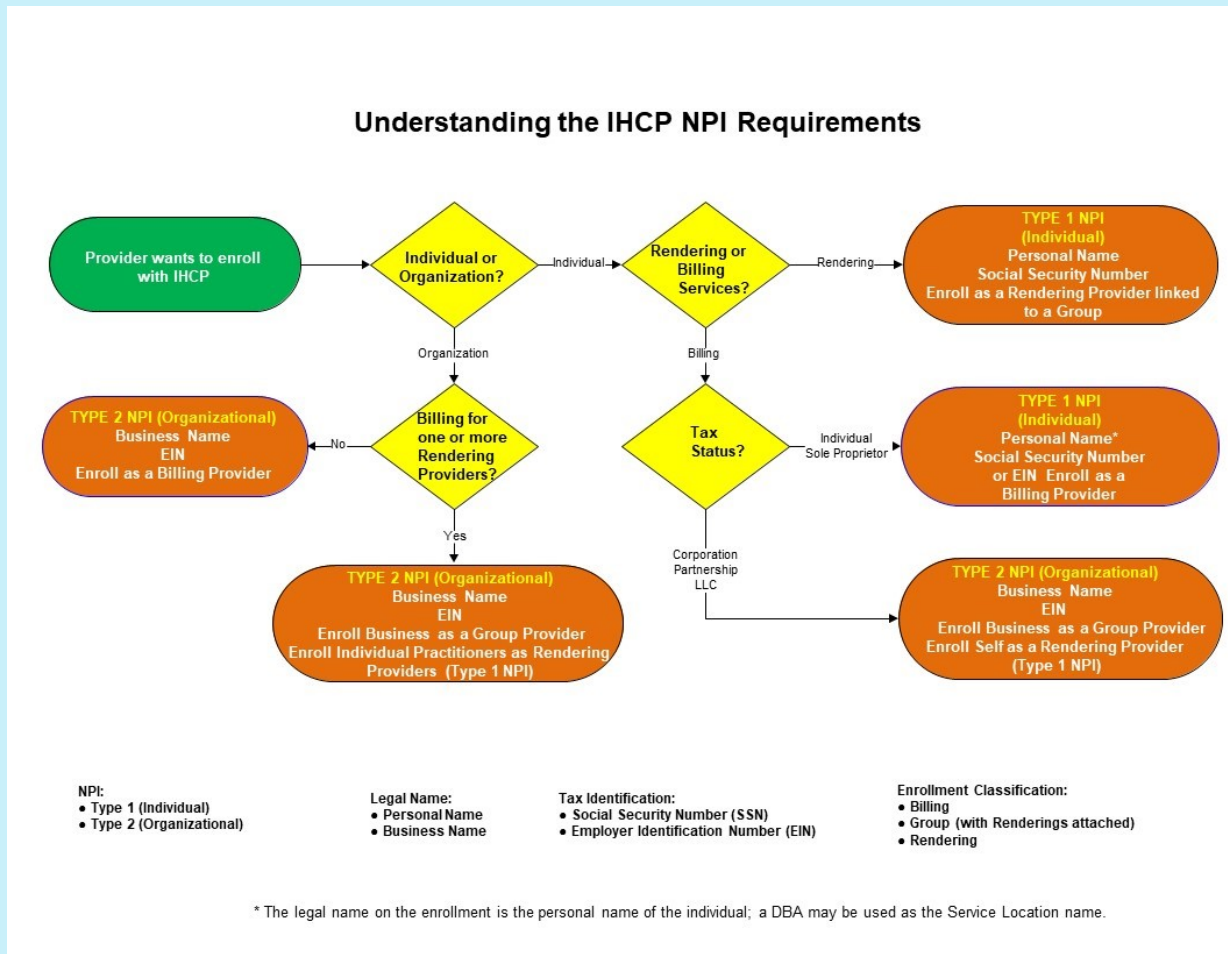
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**Example 2:** *Main Street Medical Group is a business entity conducting business as a Partnership. The entity bills and is reimbursed for services rendered by employed physicians and nurse practitioners in the name of Main Street Medical Group. The business must be enrolled with the IHCP as a Group Provider using the business' Type 2 NPI. Each employed practitioner should be enrolled 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.*

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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.

Figure 1 – NPI reporting requirements revised process



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