

## Provider Numbers: UPIN to NPI

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Mandated by congress as part of the Health Insurance Portability and Accountability Act of 1996 (HIPPA), the National Provider Identifier (NPI) is replacing the Unique Practitioner Identification Number (UPIN). The Final Rule that describes how the process will work, published January 23, 2004 and effective as of May 23, 2005, is available on the web (see Resources). Many health plans, including Medicare, Medicaid, and private health insurance issuers, and all health care clearinghouses were to have accepted and begun using NPIs in standard transactions by May 23, 2007 (small health plans were to have until May 23, 2008). However, CMS has rescinded the May 23, 2007 due date for NPI and will not penalize providers who are not in compliance. In accordance with the NPI contingency plan Certified Nurse-Midwives (CNMs) and Certified Midwives (CMs) can continue to use current forms and legacy numbers (such as UPINs) until further notice. If a CNM/CM already has an NPI, that number can and should be used.

CMS recently published guidance concerning the NPI Medicare contingency plan with Change Request 5595 - Medicare Fee-For-Service National Provider Identifier Implementation Contingency Plan. Under the NPI Contingency plan, UPINs and surrogate UPINs may still be used to identify ordering and referring providers and suppliers until further notice. Additional information can found at CMS website:  
<http://www.cms.hhs.gov/Transmittals/downloads/R1227CP.pdf>.

NOTE: Eventually we will all be required to have an NPI. Since it costs nothing to get one, and could eventually cost something not to have one, it is worth the small amount of time and effort to get one now.

Additional background information is provided below. Highlights for CNMs and CMs include:

- CNMs and CMs are among the providers being assigned NPIs.
- You may apply for the NPI in one of three ways – outlined below.

### NPI

In preparation for the NPI, Centers for Medicaid and Medicare Services (CMS), then HCFA, established the National Uniform Claim Committee (NUCC) to develop a Provider Taxonomy which identifies all types of providers of medical services. In 2001, ACNM staff spent considerable hours working with the Data Subcommittee of the NUCC to ensure that CNMs and CMs were included and correctly defined in the Provider Taxonomy. For more information on the background, use, and release schedule of the health care provider taxonomy code list, visit [http://www.wpc-edi.com/taxonomy/more\\_information](http://www.wpc-edi.com/taxonomy/more_information). The following is from Health Care Provider Taxonomy, version 3.1, October 2003:

#### **Midwife, Certified Nurse 367A00000X Active**

A provider educated in the independent management of women's health and focusing particularly on pregnancy, childbirth, the post-partum period, care of the newborn, family planning and gynecological needs of women and primary care of women. Certification requires education at the post-secondary level in nursing and midwifery. *Source: American College of Nurse-Midwives, Position Statements.*  
[http://www.midwife.org/siteFiles/position/Def\\_of\\_Mid\\_Prac\\_CNM\\_CM\\_05.pdf](http://www.midwife.org/siteFiles/position/Def_of_Mid_Prac_CNM_CM_05.pdf)

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A provider educated in the independent management of women's health and focusing particularly on pregnancy, childbirth, the post-partum period, care of the newborn, family planning and gynecological needs of women and primary care of women. Certification requires education at the post-secondary level in midwifery and health services. *Source: American College of Nurse-Midwives, Position Statements.*  
[http://www.midwife.org/siteFiles/position/Def\\_of\\_Mid\\_Prac\\_CNM\\_CM\\_05.pdf](http://www.midwife.org/siteFiles/position/Def_of_Mid_Prac_CNM_CM_05.pdf)

You will be assigned only one NPI and that NPI will not change over time. The NPI is all numeric, 10 positions in length (9 plus a check-digit in the last position). It is easily accommodated in all standard transactions, and contains no embedded information about the provider it identifies. At the current rate of provider growth, NPIs will be available for 200 years.

The National Provider System, built under a CMS contract, will process the applications and updates, ensure the uniqueness of the provider, and generate the NPIs. It will also produce reports and information based on requests from the health care industry and others.

A single entity, performing under a CMS contract and known as the enumerator, will operate the National Provider System. The enumerator will receive applications and updates from providers. The enumerator will assist providers in completing applications, in furnishing updates, and will be responsible for resolving problems and answering questions. The enumerator will notify the providers of their NPIs. The enumerator will also process requests for, and disseminate information containing, providers' NPIs.

CMS recently issued information stating that some Clearinghouses are stripping the National Provider Identifier NPIs prior to submission of the claim to Medicare. This will adversely affect Eligible Professionals in that these claims will not count toward PQRI participation. CMS urges Eligible Professionals that use clearinghouses to check with their clearinghouse to assure NPIs are not being stripped from claims. If the Eligible Professional determines that their clearinghouse is stripping NPIs from the claim, the Eligible Professional may want to consider other billing options.

### **How to Enroll**

You may apply for your NPI in one of three ways:

- 1) Through an easy web-based application process at <https://nppes.cms.hhs.gov>
- 2) Prepare a paper application and send it to the entity that will be assigning the NPI (the enumerator). A copy of the application, including the mailing address, is available at <https://nppes.cms.hhs.gov>. You may also phone 1-800-465-3203 or TTY 1-800-692-2326.
- 3) With your permission, an organization (your employer, for example) may submit your application in an electronic file.

When gathering information for your application, be sure all of your information (SSN, Federal employer ID number) is correct. Once you receive your NPI, safeguard its use. The application form contains a Privacy Act Statement which explains how CMS may disseminate the information collected.

Helpful Hint: When applying for NPI number under the category of "Taxonomy/license information," you will be asked your "Individual Type Code." You will notice that there is no category there for CNM. If you select option # 17, it will take you to a new drop down menu where you will find "Classification Name-Area of Specialization." Here you will find the category CNM.

### **UPIN**

Because NPIs were not mandated until May 23, 2007, UPINs may continue to be used. The ACNM Department of Professional Services has assisted many members over the years with concerns regarding UPINs, and has had many discussions with CMS staff on behalf of members. As a result, CMS directed their contractors to make a system change that allows CNMs to uniformly be issued UPINs when they enroll, and to have those UPINs released to them. CNMs who have been assigned a UPIN can obtain the UPIN from [www.upinregistry.com](http://www.upinregistry.com). CMS also agreed to make a change in the Medicare Carriers Manual to make clear that UPINs should be assigned and released to qualified CNMs. For more information, log on to <http://www.cms.hhs.gov/manuals/downloads/pim83c14.pdf>. If you experience problems with your UPIN, contact Gerald Wright at CMS via e-mail, at [gerald.wright@cms.hhs.gov](mailto:gerald.wright@cms.hhs.gov). If you do not have access to e-mail, you may phone him at 410-786-5798.

## **Resources**

The final rule is available at:

<http://a257.g.akamaitech.net/7/257/2422/14mar20010800/edocket.access.gpo.gov/2004/pdf/04-1149.pdf>

The CMS web site (<http://cms.hhs.gov/NationalProvIdentStand/>) provides the latest NPI news for health care providers, including a section for Medicare Fee-For-Service providers with information on the Medicare NPI implementation, and a fact sheet which answers frequently asked questions.

Revised 1/08. The ACNM “QuickInfo” series was developed by the Department of Professional Services to respond to common inquiries, summarizing ACNM resources regarding a particular topic, as well as listing selected literature and a variety of other resources. Your feedback is welcomed; contact Professional Services at (240) 485-1800 or [info@acnm.org](mailto:info@acnm.org).