

IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS BT202163 JULY 27, 2021

IHCP revises the NPI reporting requirements for enrolling providers

Effective Sept. 1, 2021, 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.



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.

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:

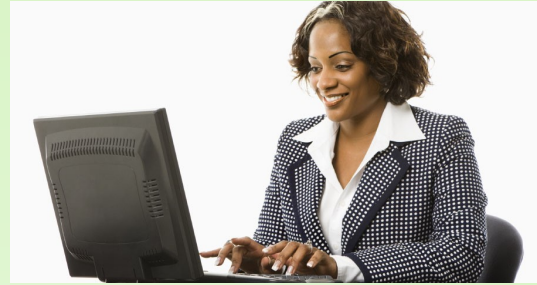
- Type 1 (individual) – A healthcare provider that is conducting business as an individual (*using a personal name when enrolling*) must obtain a Type 1 NPI.
- Type 2 (organizational) – A healthcare provider that is conducting business as an individual (*using a business name when enrolling*) or as an 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.

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 presented in this bulletin.

Conducting business as an individual

An individual healthcare practitioner who is conducting business with the IHCP as an individual but who will not be billing the IHCP directly for services must enroll with the IHCP using a personal Type 1 NPI:



- Rendering providers must enroll using their personal name as the legal name on the enrollment.
 - When enrolling through the IHCP Provider Healthcare Portal (Portal), the provider must use both the Last Name and First Name boxes on the application.
- Rendering providers must enroll using their Social Security number (SSN) as the unique identifier associated with the IHCP enrollment application.

Note: Because individual practitioners do not bill the IHCP directly for their services, they must enroll under the rendering provider classification and must be linked to one or more group providers to do business with the IHCP. Individual practitioners must provide proof of their proper licensure or certification with their IHCP rendering provider enrollment application.

Example: Jane Doe, nurse practitioner (NP), is employed by AA Medical Group. Ms. Doe's 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 Ms. Doe's 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 conducting business with the IHCP as an individual and billing the IHCP directly for services will use either a Type 1 or Type 2 NPI (depending upon how the provider will be listed in the provider directory):

- If the individual is enrolling using their **personal name**, the provider's Type 1 NPI should be used on the enrollment application. The provider's SSN must be used as the unique identifier associated with the IHCP enrollment application. The provider should select the *billing* enrollment classification.
- If the individual is enrolling using a **business name**, the provider should enroll using a Type 2 NPI (representing the business). The provider must enroll using the business' employer identification number (EIN) as the unique identifier associated with the IHCP enrollment application. The provider should select the *group* enrollment classification. The provider will also be required to enroll separately as a *rendering* enrollment classification using the practitioner's Type 1 NPI.

Example 1: Dr. Bill Smith is a sole proprietor who wishes to appear in the provider directory as "Bill Smith." Dr. Smith bills and is reimbursed directly for services personally rendered. Dr. Smith enrolls with the IHCP as a *billing provider* under the name "Bill Smith" using Dr. Smith's personal Type 1 NPI and SSN.

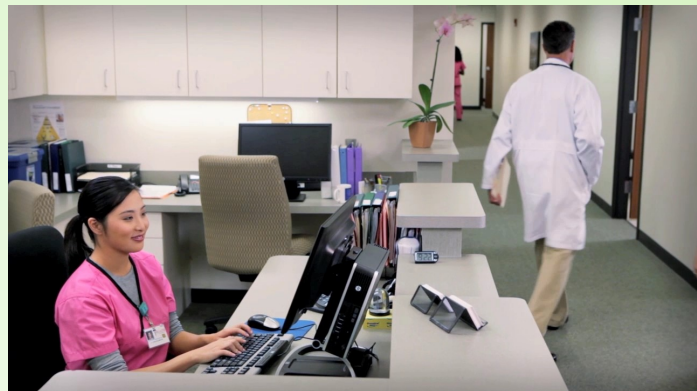
Example 2: Dr. Maggie Smith is a sole proprietor who operates the business known as "Dr. Maggie Smith Medical Services." Dr. Smith bills and is reimbursed directly for the services personally rendered. Dr. Smith enrolls with the IHCP as a *group provider* under the name "Dr. Maggie Smith Medical Services" using the organization's Type 2 NPI and EIN for the *group* enrollment and Dr. Smith's personal Type 1 NPI and SSN for the *rendering* enrollment.

Conducting business as an organization

An organization that is enrolling to bill for services and that is conducting business with the IHCP 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.
 - When enrolling through the Portal, the provider should list the entire business name on the Last Name box of the application.
- 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.



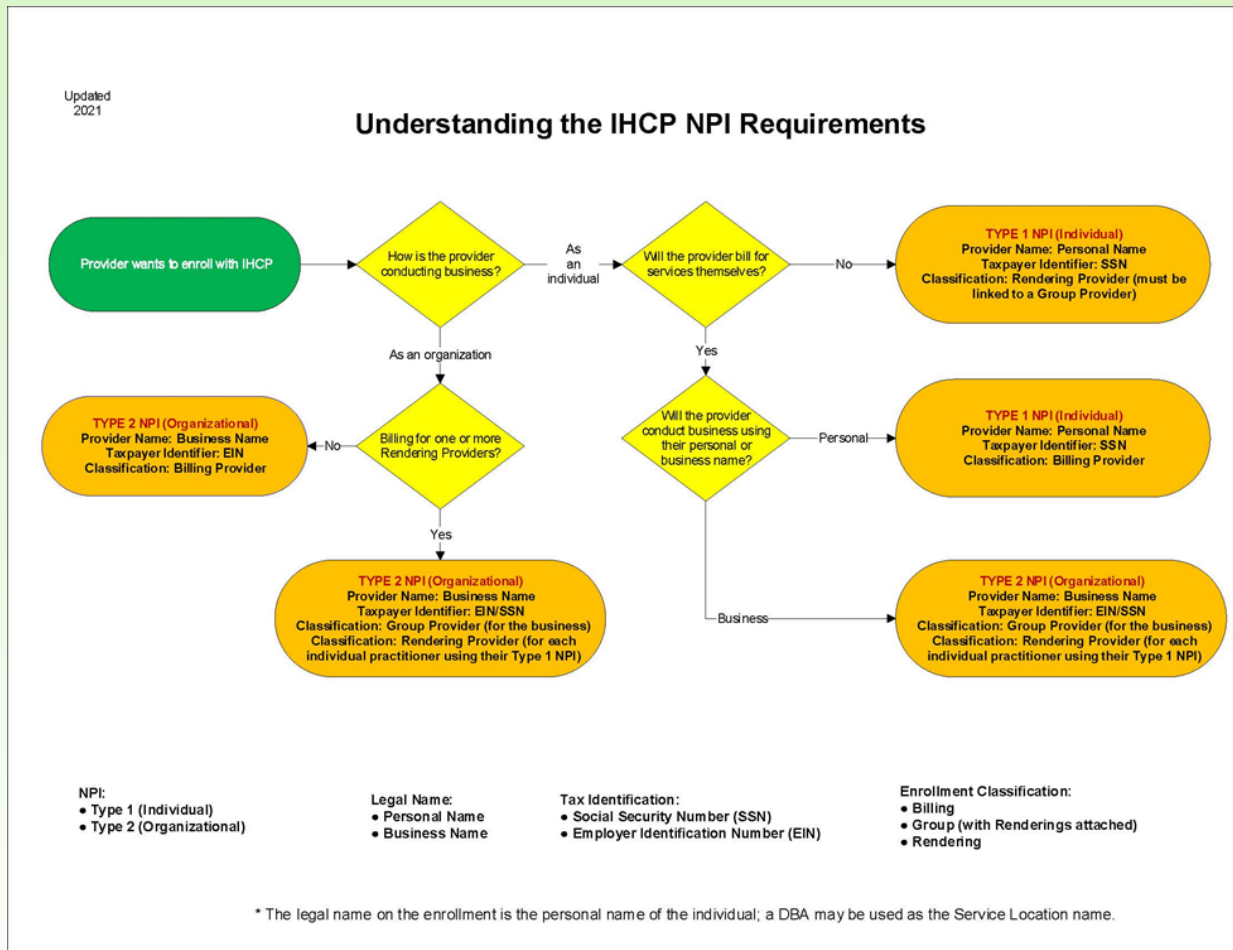
Example 1: ABC Medical Supply is a business entity that operates under the name “ABC Medical Supply.” There are no rendering providers (practitioners such as physicians, physician assistant and so on) associated with the business. The business enrolls with the IHCP as a billing provider under the name ABC Medical Supply using the business’ Type 2 NPI.

Example 2: XYZ Street Medical Group is a business entity that operates under the name “XYZ Street Medical Group.” The entity bills and is reimbursed for services rendered by employed physicians and nurse practitioners. 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 their personal name using 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.

Providers that are already enrolled with a managed care entity (MCE) through a non-IHCP line of business should enroll with the IHCP in the same manner.

Figure 1 – NPI and enrollment data reporting requirements



QUESTIONS?

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