

# National Provider Identifier (NPI) Frequently Asked Questions

January 2025

**Q: *Do I have to get a National Provider Identifier (NPI)?***

A: All HCBS providers, PAS providers, direct care workers, caregiver employees, and contracted care staff hired by an agency must obtain a National Provider Identifier (NPI) number to enroll or maintain a Nebraska Medicaid Service Provider Agreement.

Maximus will record Agency and Independent provider's NPI numbers.

Agencies are responsible for recording their workers' type 1 NPI numbers and producing them on request.

**Q: *When do I have to get an NPI?***

A: It is recommended that you apply now. After January 28, 2025, to enroll or update your provider information with Maximus an NPI number is required.

**Q: *Why use the NPI?***

A: The Federal Centers for Medicare & Medicaid Services (CMS) recommends using the NPI as a standard provider identifier. The NPI identifies providers on a national level and is recognized by entities in the healthcare industry, as well as state and federal benefit programs such as Medicare and Nebraska Medicaid waivers.

**Q: *How does an NPI number help prevent fraud?***

A: The NPI simplifies provider identification by linking their work nationwide to a single number.

**Q: *Is there any cost to obtain an NPI?***

A: The NPI is free.

**Q: *Is the NPI difficult to get?***

A: The website gives detailed instructions on how an individual can apply for an NPI number.

[https://nppes.cms.hhs.gov/assets/How\\_to\\_apply\\_for\\_an\\_NPI\\_online.pdf](https://nppes.cms.hhs.gov/assets/How_to_apply_for_an_NPI_online.pdf) You will need the following:

- Name,
- Social Security Number,
- Business Mailing Address (home or business address as an individual),
- Practice location
- Primary Taxonomy (License, if Applicable),
- Contact Information

(As an individual endpoints and affiliations are optional)

**Q: *Can my agency apply for an NPI for me?***

A: The NPPS website is designed for individuals to apply on their own. However, if you and your agency have a formal agreement, they can apply on your behalf. This agreement must grant them the legal authority to act for you in matters such as completing NPI applications and updating information.

There is a process for organizations to upload multiple people at once via Electronic File Interchange (EFI), also referred to as "bulk enumeration," Information can be found here.

<https://www.cms.gov/medicare/regulations-guidance/administrative-simplification/efi>

**Q: *I don't provide healthcare how can I get an NPI?***

A: The use of the NPI has expanded to cover not just health services but also services required to keep people healthy. CMS has put forth the following explanation:

The definitions of "health care" and "health care provider" at 45 CFR § 160.103 are crucial for determining NPI eligibility.

According to the NPI Final Rule [<https://www.govinfo.gov/content/pkg/FR-2004-01-23/pdf/04-1149.pdf> 69 FR 3437] all providers defined in the regulations can obtain NPIs. "Health care" includes any services related to the health of an individual, which extends beyond just medical care. For example, Personal Care Services like bathing and feeding are directly related to health.

Individuals, such as HCBS providers, fit the definition of health care providers, as they provide or are paid for health-related care services in the normal course of business, making them eligible for NPIs under § 162.410. Even if a personal care assistant occasionally performs housekeeping tasks, they can still qualify as a health care provider if they provide health-related services to clients

**Q: *Will having a Type 1 NPI classify me as a covered healthcare provider, potentially conflicting with the intent and application of HIPAA regulations?***

A: The NPI final rule states: "The fact that a health care provider obtains an NPI does not impose covered entity status on that health care provider." [69 FR 3437]

CMS has posted a Covered Entity Guidance tool <https://www.cms.gov/Regulations-and-Guidance/Administrative-Simplification/HIPAA-ACA/Downloads/CoveredEntitiesChart20160617.pdf> to assist with determining whether an individual or organization is a covered entity under the Administrative Simplification provisions of HIPAA. Footnotes in this online tool provide information and regulatory citations detailing definitions of each type of covered transaction.

**Q: *The NPI registration asks for a primary taxonomy. What taxonomy do I choose?***

A: The NPI taxonomies [Health Care Provider Taxonomy Code Set <https://taxonomy.nucc.org/>] support Home and Community-Based Services (HCBS) and Personal Assistance Services (PAS).

Some commonly used taxonomies are: Adult Companion, Chore Provider, Day Training/Habilitation Specialist, Home Health Aide, Homemaker, and Personal Care Attendant.

**Q: *Do I have to have all the taxonomies that might apply to my work registered with NPI?***

A: A caregiver can apply under any taxonomy that they believe best suits their qualifications and services. They need at least one primary taxonomy, other than that it is up to their discretion how many they register.

**Q: *Is Nebraska the only state in the US requiring an NPI for personal care?***

A: Nebraska is not the first state to require an NPI for Medicaid personal care providers. Also, more states are considering using NPI since CMS has recommended this as a method to combat fraud.

**Q: *Why is Nebraska doing this?***

A: Nebraska Medicaid is currently facing significant scrutiny due to serious audits revealing extensive fraud, and misuse by both independent and agency HCBS and PAS providers. Implementing NPI registration for all providers is a crucial step in addressing these fraudulent activities and wasteful spending ensuring that funds are preserved for legitimate providers and the participants who depend on our vital services.

**Q: *How much oversight is sufficient?***

A: We have an obligation to implement reasonable controls to identify and prevent fraud. Not having providers or caregivers with an NPI creates a barrier to uniformly identifying a provider and establishing those controls.

**Q: Do Shared Living Providers (SLPs) need to enter their own NPIs into Maximus?**

A: Yes, the NPI for a SLP is kept in Maximus.

**Q: Do I load my Direct Service Professionals (DSPs) NPIs into Maximus?**

A: No, the agency keeps the NPI on file.

**Q: Our agency's original NPI was linked to a corporation. (inc); however, we are now LLC- fair to say I should apply for a new NPI with the LLC status, correct?**

A: Some things can be updated on the website, but this might be a situation where the NPI needs to be deactivated and re-applied. Please follow NPES directions on actions you should take to maintain or update your NPI.

**Q: What are members choosing for your Direct Service Professional (DSP) taxonomy?**

A: Some commonly used taxonomies are: Adult Companion, Chore Provider, Day Training/Habilitation Specialist, Home Health Aide, Homemaker, and Personal Care Attendant.

**Q: Can someone have more than one NPI if they have a profession that needs one and is also a Shared Living Provider (SLP)?**

A: No, an individual can only have one NPI type 1.

**Q: As a childcare provider would our agency need the type 2 NPI and each staff will need Type 1?**

A: If you are a Licensed Childcare Center your staff does not need a Type 1, but if you are a Licensed Family Childcare Home or other Licensed Exempt Childcare Provider providing Medicaid services, such as respite, AD extra care for childcare, child day habilitation, etc. then yes, your staff need a type 1 NPI.

**Q: Can someone lose their NPI number if they no longer qualify?**

A: Type 1 NPIs are only turned off at notice of the provider's death or other valid reasons to deactivate them. For example, if a provider finds someone else has used their NPI fraudulently, they can apply for a new NPI. In this case, their old NPI will be deactivated.

**Q: How would I know as a provider if an NPI is deactivated?**

A: There is an NPI search on the website. <https://npiregistry.cms.hhs.gov/search> where you can search by name or NPI number.

**Q: Is there a specific location in Maximus to enter the agency NPI?**

A: As of January 28th there is a place in Maximus to enter the NPI.

**Q: Can an agency help their Shared Living Providers (SLP) update Maximus with their NPI number?**

A: The agencies can help.

**Q: Is there a guidance document on how to update the NPI in Maximus too?**

A: There is a place in Maximus to enter the NPI number as of 1/28/2025. If more assistance is needed contact Maximus at 1-844-374-5022 or Medicaid Provider Relations at [nebraskamedicaidPSE@maximus.com](mailto:nebraskamedicaidPSE@maximus.com)

**Q: Any staff providing direct care, regardless of job title, would need an NPI correct?**

A: Yes, the only exceptions are workers and volunteers in a Licensed Assisted Living Facility, Licensed Child Care Center, or Home-Delivered Meal agency.

**Q: Can you look up an NPI number?**

A: Yes, there is an NPI search on the website. <https://npiregistry.cms.hhs.gov/search>

**Q: Can the Agency add many employees at once to NPI?**

A: There is a process for organizations to upload multiple people at once via Electronic File Interchange (EFI), also referred to as "bulk enumeration," Information can be found here.

<https://www.cms.gov/medicare/regulations-guidance/administrative-simplification/efi>

**Q: If our agency has already established an NPI number with our Behavioral health clinic, do we need another NPI for the Developmental Disabilities (DD) services?**

A: No, only one NPI is required.

**Q: Is the NPI a tax number and will the NPI affect taxes for the Direct Service Professionals (DSP)s or Shared Living Providers (SLPs)?**

A: The NPI does not do anything with your taxes.

**Q: What would we use for the business location and practice location addresses for individuals?**

A: The individual can use the agency address for both addresses. It is better to use a business address since it will appear on the public NPI registry.

*The National Provider Identifier (NPI) application requires both a Business Mailing Address and a Business Practice Location Address to be listed. The Business Mailing Address can be the same as the Business Practice Location Address if the provider can receive mail at the same location where he/she practices.*

*Both the Business Mailing Address and Business Practice Location Address are made public via the NPI Registry on the National Plan and Provider Enumeration System (NPPES) and can be updated at any time. [https://nppes.cms.hhs.gov/webhelp/nppeshelp/NPPES%20FAQS.html]*

**Q: When will the website be available for providers to sign up to request their NPI?**

A: The website is a nationwide website that has been up for a few years now. It is available now.

To start the process [nppes.cms.hhs.gov/#/](https://nppes.cms.hhs.gov/#/)

Here is the help site <https://nppes.cms.hhs.gov/webhelp/index.html>

NPPES Frequently Asked Questions <https://nppes.cms.hhs.gov/webhelp/nppeshelp/NPPES%20FAQS.html>

**Q: I was wondering if you had a provider bulletin or official letter out with the information regarding caregivers being required to have NPI numbers?**

A: The Provider Bulletin is on the Nebraska DHHS Medicaid website.

<https://dhhs.ne.gov/Medicaid%20Provider%20Bulletins/Provider%20Bulletin%202024-24.pdf>