**AMA**

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**Michael D. Maves, MD, MBA,** Executive Vice President, CEO

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| Memo to: | Executive Directors<br>State Medical Associations<br>National Medical Specialty Societies |
| From: | Michael D. Maves, MD, MBA |
| Date: | June 29, 2007 |
| Subject: | CMS' Dissemination Plans for Numbers and Information Supplied on Applications |

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**The Centers for Medicare and Medicaid Services (CMS) announced on May 30, 2007 its' plan for disseminating physicians' and other providers' National Provider Identifiers (NPIs) to the public through an NPI registry.** The announcement outlines that CMS intends to make the NPI and much of the information on a physician's NPI application available to the public through an NPI online registry. CMS asserted that it is permitted to disclose certain information to the public pursuant to the Freedom of Information Act (FOIA). The AMA fully supports facilitating the implementation of the NPI. We do, however, have tremendous concerns with the potential for identity theft from posting much of a physician's identifying information in one location on a government web site. The AMA strongly disagrees with CMS' interpretation of what information may be released under FOIA. The AMA is carefully reviewing the policy and is exploring potential avenues to mitigate the effect. **CMS officials originally planned on making the online NPI registry available at the end of June. Due to aggressive AMA advocacy, CMS just announced the agency will postpone making <u>the NPI registry available to the public until August 1, 2007</u>. In the meantime, CMS is permitting physicians to verify the accuracy of information and delete any information in the "optional" category that a physician does not want to share with the public. <u>Physicians must edit their data by July 16<sup>th</sup></u>.**

**The AMA encourages physicians to:**

1. Review the information you supplied on your NPI application which CMS has said it is permitted to disclose, to ensure it is accurate and make any necessary changes.
2. Ensure that the address which you furnished is your business address, not your home address.
3. Review the information you supplied which CMS has deemed "optional" and <u>delete any "optional" information you do not want shared with the public.</u>

CMS published a list of **"optional"** information, *Information on FOIA-Disclosable Data Elements in NPPES* at: **http://www.cms.hhs.gov/NationalProvIdentStand/06a_DataDissemination.asp#TopOfPage** (Under 'Downloads')

## TIPS:

- **Social Security Number:** Physicians have the option to disclose their Social Security Number (SSN) on their NPI application. Physicians who elected to furnish their SSN on their NPI application should note that CMS has said it does NOT have the authority under FOIA to release SSNs. If a physician supplied the SSN on the NPI application and is reviewing the NPI information online, the SSN number should not be visible if it was entered into the appropriate field as CMS has masked it. If the number is visible, it was likely entered into an incorrect field and a physician should delete it. Physicians should also note that CMS has masked the date-of-birth field.

- **Drug Enforcement Agency Number (DEA):** Physicians have the option to disclose their DEA number on the NPI application under Section 3C of the paper application form or under the "Other Identifiers" screen for the online application. Physicians who supplied their DEA number on their NPI application but do not want it published in the NPI database should delete this information before it is made available to the public.

- **Other Provider Numbers:** This portion of the application is "optional." For paper applications it can be found under Section 3C and online it can be found on the "Other Identifiers" screen. Physicians who decide to delete their "other identifiers" from this part of the application may want to contact their payers to be sure those payers are able to match their NPI number to their old, payer-issued identifiers so as to avert any claims processing problems.

- **NPI Enumerator:** Physicians must make changes online using their username and password or by submitting changes on paper to CMS form 10114. Online changes can be made on the NPI Enumerator website: **https://nppes.cms.hhs.gov/NPPES/**. Paper forms can obtained from the **NPI Enumerator by calling 800-465-3203**. NOTE: CMS has revised the NPI application/ change of information form. Old versions of the form will be accepted if postmarked by July 13. This new form can be obtained by calling the above number or downloaded online from: http://www.cms.hhs.gov/CMSForms/. Physicians who need assistance making any changes to their application can also call the above number.