

1 **National Provider Identifier (NPI) as the Unique Nurse Identifier**

2 **Purpose**

3 Health system transformation that recognizes the value of nursing services through positive patient
4 outcomes and correlating reimbursement are priorities of ANA. Use of national provider identifiers
5 (NPIs) allow providers, including Advanced Practice Registered Nurses (APRNs), to bill Medicare and
6 Medicaid for services provided to patients. The purpose of this position statement is to:

- 7 1. Affirm the role the NPI plays in billing and reimbursement; and
- 8 2. Establish that an NPI is foundational to evaluating the value of the nurse in the health care
9 system.

10 **Statement of ANA Position**

11 Registered nurses (RNs) are integral to the health care team and spend significant time with patients
12 providing clinical services. In the current health care financing system, this work is generally not
13 accounted for, other than in the physician's practice expense (PE) relative value unit (RVU). The lack of
14 NPIs for nurses makes it extremely difficult to record, measure, and value the services they provide and
15 their impact on patient outcomes. NPIs play a key role in reimbursement and obtaining an NPI is a first
16 step to recognize and evaluate the value of the nurse in the health care delivery system and as a result,
17 ANA maintains that all nurses should obtain NPIs. The time spent by the RN is the main element of RN
18 work that is captured in the PE of billing providers. Obtaining and recording NPIs in appropriate
19 healthcare data systems would allow health systems, payers, and enterprise resource planning systems
20 to extract nursing services from other providers. This then allows for a quantitative analysis and
21 substantive demonstration of the nurse's role and value as an integral member of a patient's health care
22 team.

23 **Recommendations**

24 As policymakers, health care organizations, and payers continue to look at ways to evolve and reform
25 the health care system, ANA strongly advocates for changes in current reimbursement models to
26 recognize the value of the nurse. The American Medical Association (AMA) created the CPT and RUC
27 system to value the work done by physicians and other qualified healthcare providers. While APRNs and
28 other non-physician providers have NPIs, patient care provided by RNs is not billed separately. The
29 result is that RNs have historically been included as part of PE when the RUC either establishes or
30 modifies the value of procedures in the CPT code set. However, this only captures the time it takes
31 rather than fully capturing the scope of services that RNs provide to patients. RNs must be recognized
32 for their expertise and the clinical services they provide and, therefore, ANA recommends:

- 33 1. All RNs and APRNs should obtain an NPI to elevate and recognize them as clinicians providing
34 vital services to patients.
- 35 2. Employers should assist RNs in obtaining NPIs.

36 **Background**

37 Passage of the Health Insurance Portability and Access Act of 1996 (HIPAA) created a system that
38 required unique healthcare identifiers for each healthcare provider. The NPI was created to fulfill this
39 requirement and continues to fulfill this role today. CMS began issuing NPIs in 2006 and starting in May
40 of 2008 CMS required the use of NPIs by healthcare providers in order to receive reimbursement for
41 services provided.

42 NPIs are standard and required by both Medicare and Medicaid to reimburse clinicians, who use an
43 unique NPI to bill Medicare and Medicaid for services provided. The current reimbursement model does
44 not allow RNs to bill using this system and registered nurse time and effort is not separately reimbursed.
45 Other federal health programs, including TRICARE, also require use of NPIs for billing healthcare
46 providers. Additionally, while not required by law, many private payers require providers to bill using
47 NPIs.

48 Obtaining NPIs is free and is recognized by the Office of the National Coordinator for Health Information
49 Technology (ONC) as the standard to meet the interoperability need for representing the health care
50 provider. Additionally, NPIs are standard across health care professionals and unlike licensure, it can be
51 used if a nurse moves across state lines. The NPI does not contain any personal information about the
52 provider.

53 CMS provides three ways to obtain an NPI.

- 54 1) Apply online through the National Plan and Provider Enumeration System.
- 55 2) Apply with a paper application. The application is available through CMS.
- 56 3) Give permission to an Electronic File Interchange Organization to submit application data on
57 one's behalf.

58 Employees are always able to apply for their own NPI. The process takes only a few minutes to complete
59 and the number is usually assigned within 24 hours, but if the provider is employed by a healthcare
60 organization and has not previously received their own NPI, then the healthcare organization can apply
61 for the NPI on behalf of their employee, but these are frequently not taken as a priority so the clinician
62 may want to apply for their own NPI. NPIs do not change and remain with the providers even if they
63 change employment.

64 Obtaining NPIs are not required for RNs, but they are eligible to receive them. Currently, NPIs would not
65 change RN reimbursement or pay as RN times and services provided are now included in the PE of
66 physician RVUs. Obtaining NPIs is an important first step in changing this structure as ANA continues to
67 advocate for separate reimbursement for the work done by RNs.

68 **Summary**

69 NPIs remain the gold standard for identifying and reimbursing the health care clinicians who provide
70 care for the patient. As we move toward full recognition of the value of nursing, obtaining NPIs is a good
71 first step to strive towards direct reimbursement for critical nursing services that are key to the
72 provision of quality patient care.

73 **References**

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- 75 <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/NPI-What-You-Need-To-Know.pdf>
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