

NPI Registration Errors and Claim Submission Discrepancies

As a result of the dual-use period enacted by Medi-Cal, providers began billing with both their Medi-Cal provider number and NPI. Medi-Cal has compared provider claim submission data with NPI registration data and found significant discrepancies. These discrepancies are listed below as well as the possible causes.

1. NPI on claim does not match the provider number registered with Medi-Cal.
 - Organizations that have obtained separate NPIs for their subparts (components of a health care provider that is an organization) and have submitted a claim with the wrong NPI for a specific subpart will cause the claim to deny. For example, a claim for an outpatient service submitted with an NPI registered for an inpatient Medi-Cal provider number will be denied.
 - The NPI was registered with the wrong Medi-Cal provider number. The NPI on the claim is not associated with the Medi-Cal provider number submitted on the claim.
2. NPI received on claim is not registered with Medi-Cal.
 - Providers with multiple Medi-Cal provider numbers may not have registered all of their provider numbers with either one NPI or with subpart NPIs.
3. NPI received on claim is not a valid NPI.
 - The NPI may have been entered incorrectly on the claim.

Other registration errors that may lead to claim delays or denials are listed below:

Individual Providers (Entity Type 1):

1. Individual providers sharing one NPI.
 - An entity type 1 (individual) NPI may **not** be shared by two or more individual providers. Every entity type 1 (individual) provider must apply for an NPI from the National Plan and Provider Enumeration System (NPPES) and register with Medi-Cal.
2. Individual providers that incorporate themselves.
 - Separate NPIs must be obtained for the individual provider number (entity type 1 NPI) and the organizational provider number (entity type 2 NPI). However, the provider enrolled with Medi-Cal will determine which NPI should be registered with Medi-Cal.
3. Individual providers sharing an NPI with the group.
 - Every provider must apply for an NPI from NPPES. The rendering providers under the group must each obtain an entity type 1 NPI. The group must obtain an entity type 2 NPI. Each provider must register their NPI with their Medi-Cal provider number.
4. Individual providers sharing an NPI with an organization/institution.
 - Every provider must apply for an NPI from NPPES. The providers rendering services in an institution must each obtain an entity type 1 NPI. The institution must obtain an entity type 2 NPI. Each provider must register their NPI with their Medi-Cal provider number. The entity type 1 NPI must be associated with the individual Medi-Cal provider number, and the entity type 2 NPI must be associated with the organizational Medi-Cal provider number (group number).

Organizations (Entity Type 2):

1. Group providers sharing an NPI with rendering providers under the group.
 - Every provider must apply for an NPI from NPPES. The group must obtain an entity type 2 NPI, and the rendering providers under the group must obtain an entity type 1 NPI. Each provider must register their NPI with their Medi-Cal provider number.
2. Organizations/institutions sharing an NPI with a provider rendering services in their facility.
 - Every provider must apply for an NPI from NPPES. The organization must obtain an entity type 2 NPI, and the individual providers rendering services in the facility must each obtain an entity type 1 NPI. Each provider must register their NPI with their Medi-Cal provider number, if they have one.
3. Provider groups and institutions with different owners sharing one NPI.
 - If the provider is part of the legal organization, this is acceptable. If the provider is not part of the legal organization, the NPI cannot be shared with any other entities. Every provider must apply for an NPI from NPPES. One NPI may not be shared by two or more different entity type 2 (organization/institution) providers. According to Centers for Medicare & Medicaid Services (CMS), each entity must obtain a separate NPI. Each entity must register their NPI with their Medi-Cal provider number.
4. Organizations/institutions with different owners sharing the same NPI.
 - If the provider is part of a legal organization, this is acceptable. If the provider is not part of a legal organization, the NPI cannot be shared with any other entities. Every provider must apply for an NPI from NPPES. One NPI may not be shared by two or more different entity type 2 (organization/institution) providers. According to the CMS, each entity must obtain a separate NPI. Each entity must register their NPI with their Medi-Cal provider number.

Providers have registered NPIs in a variety of ways. Some of these variations and corresponding outcomes are listed below:

Individual Providers (Entity Type 1):

1. Same provider obtained one NPI for different service locations/types of service.
 - The “pay-to” addresses, Electronic Funds Transfer (EFT) account and Provider Identification Number (PIN) information on the first Medi-Cal or CHDP number entered in the NPI Collection (NPIC) registration tool or designated on the [National Provider Identifier Registration Form](#) will be transferred to the new single NPI.
 - The different “pay-to” addresses, EFT accounts and PINs for the other Medi-Cal/CHDP provider numbers will no longer be used.
 - No action is required of the provider.
2. Individuals that incorporated themselves and replaced multiple provider numbers (same or different TINs) with one NPI.
 - The “pay-to” addresses, EFT account and PIN information on the first Medi-Cal or CHDP number entered in the NPIC registration tool or designated on the [National Provider Identifier Registration Form](#) will be transferred to the new NPI.
 - The different “pay-to” addresses, EFT accounts and PINs for the other Medi-Cal/CHDP provider numbers will no longer be used.

- If a provider currently has a different TIN for each provider number, the system will transfer only the TIN from the first Medi-Cal/CHDP provider number registered to the NPI record. As a result, Medi-Cal will only send one 1099-tax form to the provider.
- No action is required if the provider intends to merge accounting records for multiple Medi-Cal/CHDP provider numbers.

Organizations (Entity Type 2):

1. Providers that did not obtain subpart NPIs, therefore, replacing multiple provider numbers with one NPI.
 - Only the “pay-to” addresses, EFT account and PIN information on the first Medi-Cal or CHDP number entered in the NPIC registration tool or designated on the [National Provider Identifier Registration Form](#) will be transferred to the new single NPI.
 - For Medi-Cal/CHDP providers wishing to maintain multiple “pay-to” addresses, differing EFT accounts, PINs or multiple TINs consistent with their current Medi-Cal/CHDP provider numbers, the Department of Health Care Services (DHCS) encourages these providers to explore the use of subpart NPIs.
 - No action is required if the provider intends to merge accounting records for multiple Medi-Cal/CHDP provider numbers.
2. Providers with different TINs that did not obtain subpart NPIs, therefore, replacing multiple provider numbers with one NPI.
 - Only the “pay-to” addresses, EFT account and PIN information on the first Medi-Cal or CHDP number entered in the NPIC registration tool or designated on the [National Provider Identifier Registration Form](#) will be transferred to the new single NPI.
 - If a provider currently has a different TIN for each provider number, the system will transfer only the TIN from the first Medi-Cal/CHDP provider number registered with the NPI record. As a result, Medi-Cal will only send one 1099-tax form to the provider.
 - For Medi-Cal/CHDP providers wishing to maintain multiple “pay-to” addresses, differing EFT accounts, PINs or multiple TINs consistent with their current Medi-Cal/CHDP provider numbers, DHCS encourages these providers to explore the use of subpart NPIs.
 - No action is required if the provider intends to merge accounting records for multiple Medi-Cal/CHDP provider numbers.
3. Providers who registered an entity type 1 (individual) NPI in the “additional NPI” field on NPIC.
 - The “additional NPI” field on NPIC was removed due to inappropriate use. Many providers included an NPI that corresponds to an entity type 1 (individual) provider when the appropriate use of this field was to identify “subpart” NPIs existing within an organization (entity type 2).
 - Providers who entered an NPI in the “additional NPI” field are encouraged to call the TSC to verify if Medi-Cal was able to confirm the validity of the NPI entered in that field.