

To the extent that the Medicare program requires separate enrollment and certification, CMS strongly encourages providers to mirror Medicare enrollment and certification in obtaining NPIs.

For the current Olympic Physicians rural health clinic (RHC), please note the following:

- Each **health professional** (e.g., physician and mid-level practitioner) at Olympic Physicians rural health clinic (RHC) needs his/her own individual NPI. (You did not say so, but I presume the professionals already have their individual NPIs: if so, please note that each individual professional needs only one NPI.)
- As an **RHC**, Olympic Physicians also needs an NPI for the RHC services it provides and bills to the fiscal intermediary.
- As freestanding RHC, Olympic Physicians also routinely furnishes certain "non-RHC" services to beneficiaries in that setting (i.e., lab tests and the technical components of other diagnostic services) and bills these services to the Part B carrier for reimbursement. If for its current RHC site Olympic Physicians is enrolled with the Part B carrier as a **group practice** for the purpose of billing such non-RHC services furnished in that setting, it also will need an NPI for the group practice. (The only other way to bill the carrier for these non-RHC services furnished in the RHC would be via the individual enrollments/NPIs of the various RHC practitioners.)

For the new or temporary site--which currently is not an RHC but ultimately may become one--please note the following:

- If each **health professional** that will be providing services at the new or temporary already has his/her individual NPI, he/she does not need to obtain a new or additional NPI. Please note, however, that each practitioner (i.e., physicians and mid-level practitioner) must update the individual CMS 855 I he/she has on file with the Part B carrier, in order to add the practice location.
- If the practitioners are establishing a **new group practice** (i.e., that is different from the group practice for the current RHC site), it will be necessary to obtain a separate NPI for the new group practice.
- Based on your message (below) it appears more likely to me that instead of a new group practice, the practitioners are establishing another location for an existing group practice that operates at the Olympic Physicians RHC site (i.e., for the purpose of billing to the Part B carrier the non-RHC services furnished there). If so, and the existing group practice already has an NPI, it will not be necessary to obtain an additional NPI for the added location. Please note, however, that in this scenario the currently enrolled group practice (i.e., at the current RHC site) must update its CMS 855 B on file with the Part B carrier, in order to include/add this new, additional location.

Sincerely,

Alma Hardy

Health Insurance Specialist/Rural Health Coordinator

Centers for Medicare & Medicaid Services (CMS)

Region 10

2201 Sixth Avenue – Mailstop RX-40

Seattle, Washington 98121-2500

(206) 615-2387

FAX: (206) 615-2472

alma.hardy@cms.hhs.gov