

ELECTRONIC FILE INTERCHANGE

Summary

This outline of the Electronic File Interchange (EFI) process is divided into six main parts:

I. WHAT IS EFI?

II. WHY DO WE HAVE EFI?

III. HOW EFI WORKS

IV. EXAMPLE OF EFI IN ACTION

V. SPECIAL EFI TOPICS

A. Becoming an EFIO

B. Preparing and Submitting Files to NPPES

C. Processing the File and Resolving Discrepancies

D. Changes of Information

E. Other EFIO Responsibilities

VI. CONTACT INFORMATION

I. WHAT IS EFI?

Electronic File Interchange (EFI), also referred to as "bulk enumeration," is a process by which a health care provider (hereinafter simply referred to as "provider") or group of providers can have a particular organization (the "EFIO") apply for National Provider Identifiers (NPI) on their behalf. In other

words, rather than a provider or group of providers submitting a paper or web NPI application, the EFIO obtains an NPI for him/her/them.

What makes EFI so unique is that one file can contain hundreds or thousands of providers' applications. By submitting these applications both simultaneously and electronically, the administrative and financial burdens for both the provider community and the U.S. Department of Health and Human Services (HHS) are greatly reduced. These benefits are enhanced because EFI can also be used to change or update a provider's existing NPI information.

CMS anticipates that EFI will be available in the late spring of 2006. Once EFI is operational, organizations can register as EFIOs, mail their certification statements to the Enumerator, and submit files to NPPES.

II. WHY DO WE HAVE EFI?

The administrative simplification provisions of the Health Insurance Portability and Accountability Act (HIPAA) of 1996 (P.L. 104-191) required the Secretary of HHS to adopt a standard unique identifier for all health care providers for use in the nationwide health care system. HHS published a Final Rule on January 23, 2004, that announced the NPI as the standard identifier, and that providers could begin applying for NPIs on May 23, 2005.

Since all HIPAA-covered entities, including Medicare and all other health plans, must begin using NPIs in HIPAA standard transactions (which includes electronic claims) by May 23, 2007, providers must obtain NPIs promptly so they can use them in these transactions and not experience interruptions or delays in receiving reimbursement from a health plan.

A provider can currently obtain an NPI via a paper application or over the web through the National Plan and Provider Enumeration System (NPPES). These applications must be submitted individually, on a per-provider basis. As explained above, however, the EFI process is designed to allow provider-designated organizations (the EFIOs) to capture multiple providers' NPI application information on a single electronic file for submission to NPPES.

III. HOW EFI WORKS

The basic steps of the EFI process are as follows:

STEP 1 - EFIO REGISTRATION

If an organization would like to become an EFIO, it must log onto <https://nppes.cms.hhs.gov> and follow the appropriate links to the EFIO registration page. Once there, a representative of the EFIO (hereinafter referred to as an "EOR") will enter certain information about himself/herself and the EFIO into the NPPES system. (This will include the EOR's selection of a user ID and password.)

An authorized official of the EFIO must then sign and complete a certification statement and mail it to the following address:

NPI Enumerator

P.O. Box 6059

Fargo, North Dakota 58108-6059

(This is the address of "the Enumerator," the CMS contractor responsible for processing NPI applications.) Faxed or e-mailed certification statements are not permitted, nor are stamped or photocopied signatures.

Per the certification statement, which will be downloadable from <https://nppes.cms.hhs.gov>, the authorized official must: (1) have the legal authority to bind the EFIO to all of the terms and conditions of the certification statement, and (2) be a W-2 employee or owner of the EFIO.

The organization cannot submit files to NPPES until the Enumerator has received and approved the certification statement, at which time the Enumerator will activate: (1) the EOR's user ID and password, and (2) the EFIO's system-generated ID.

STEP 2 - EFIO GATHERS AND FORMATS DATA FROM PROVIDERS

The EFIO will collect all of the relevant data from those providers on whose behalf the EFIO will act and enter it into an XML file for eventual submission to NPPES. (The XML file and the instructions for using it can be found in the EFI Technical Companion Guide. See Section V.B. below for more information.)

IMPORTANT: The EFI process will not accommodate applications from sole proprietors, as some sole proprietors must select Healthcare Provider Taxonomy Codes from the Non-Individual portion that Code Set. EFIOs should therefore not submit NPI applications from sole proprietors.

STEP 3 - EFIO SUBMITS THE XML FILE TO NPPES

Once the EFIO collects and enters the providers' data into the XML format, it uploads (transmits) the file electronically to NPPES. The EFIO will then receive two e-mails from NPPES. The first contains the NPPES-generated file name. The second indicates whether the file upload was successful.

STEP 4 - NPPES REVIEW AND FEEDBACK

When a file is submitted to NPPES, it is placed in a "queue." This means that the file is held until the Enumerator is ready to have NPPES review it. Once the file is removed from the queue, its contents - including each provider's record - will be run against NPPES and its edits. One of several results may follow:

A. Every record in the file successfully passes all edits and validations.

NPIs are then assigned for each provider. The NPIs will be included in a return file that the EFIO can download. The EFIO must then notify each provider of its NPI. (As a reminder, the NPI belongs to the provider, not the EFIO.)

B. Most records pass through the edits, are properly validated, and NPIs are assigned. Some records, however, require Enumerator intervention,

typically for purposes of additional validation. NPPES will make available to the EFIO a downloadable return file. The file will contain codes that indicate the status of each pending record. It will also contain the NPIs of those providers that were enumerated. In this scenario, the Enumerator may contact the EFIO for assistance in resolving discrepancies involving certain records.

C. The entire file is rejected because a certain percentage of the records therein do not pass through the edits or are otherwise deficient from a technical standpoint. No return file will be generated or available to the EFIO. The EFIO will receive an e-mail notification that the file was rejected. The EFIO may resubmit the entire file once the errors have been detected and corrected.

IV. EXAMPLE OF EFI IN ACTION

Consider the following example of how the EFI process works:

The EFIO uploads a file containing 2,000 records. Unbeknownst to the EFIO, 200 (or 10%) of the records contain errors. Of these 200, 50 contain data fields that have no information in them. The remaining 150 contain minor discrepancies.

Here's what will typically happen:

1. The EFIO receives an e-mail from NPPES stating that the file was successfully uploaded.
2. The file is placed in a "queue", as explained in Step 4 above. When the Enumerator is ready to run the file against the NPPES edits, it will remove the file from the queue. (The length of time in which a particular file remains in the queue depends on several factors, most notably the existing volume of EFI traffic.)
3. The file is run against NPPES. Records in which required data are missing will be rejected immediately. Records in which there are minor discrepancies

are referred to the Enumerator for further review. For records that pass through all edits and verifications, NPIs will be issued.

4. Typically no later than six business days after the file is released from the queue, the EFIO will receive an e-mail from NPPES stating that the file has been processed and can be downloaded by the EFIO. If the file is rejected, the e-mail will state as such.

5. The EFIO can download the file and review the status of each record therein. Each record will be accompanied by a code that identifies the record's status. In general, there will be three types of record statuses: (1) the record has been rejected; (2) the record has been approved and an NPI issued; and (3) the record has been pended for Enumerator review.

6. If the record is in pended status, the Enumerator will attempt to resolve the discrepancy itself. If unable to do so, it will contact the EFIO and ask the latter to resolve any outstanding issues with the affected provider(s). Though the EFIO is not prohibited from taking steps on its own to resolve a particular application discrepancy, such actions should be very limited. (See V.C.5. below for further clarification.)

7. Approximately every six business days after the file is initially available for downloading, NPPES will furnish revised files containing updated statuses for those records that had been pending as of the most recent update. Those records that have since been approved will contain the newly-assigned NPIs, while recently-rejected records will be denoted as such.

Each return file will be updated and downloadable until all records therein have been resolved (accepted or rejected) by NPPES.

V. SPECIAL EFI TOPICS

A. BECOMING AN EFIO

Any organization - regardless of its size - that meets the necessary criteria may become an EFIO. Common examples of EFIOs may include national or state provider organizations, hospitals, or other entities.

1. The Certification Statement

The certification statement, Form CMS-10175, will be downloadable at <https://nppes.cms.hhs.gov> or from the CMS forms page (www.cms.hhs.gov/forms). This form requires that the authorized official attest to, among other things, the following:

a. The EFIO has the written legal authority to act on behalf of those providers for whom it is submitting NPI data to NPPES.

Note that prior proof of a written agency agreement will typically not be required. The parties themselves must handle all agency matters, though the Enumerator reserves the right to ask the EFIO for evidence of an agency relationship if circumstances warrant.

b. Each provider on whose behalf the EFIO submits a NPI application has informed the EFIO in writing that the provider's information to be submitted to NPPES is accurate and complete.

The provider's approval can be given via: (1) a signature on the same certification statement used for paper NPI applications; (2) letter; or (3) e-mail. The specific wording of the "approval document" is left to the discretion of the EFIO and the provider.

The approval document must be kept on file with the EFIO. It is recommended that the document be attached to some sort of final printout/copy of the provider's NPI data. However, the EFIO is not required to do this, nor must the EFIO present the provider with a written copy of the information to be submitted. It is only required that the provider's approval be given in writing via one of the mechanisms described above.

For individual providers (e.g., physicians), the individual himself/herself (not his/her representative) must attest to the accuracy of the information. For organization providers, an authorized official (as that term is defined on the current NPI application form) of the provider must make the attestation. Per the certification statement, the data that the provider is identifying as accurate and complete cannot be older than 12 months from the date such attestation is given.

2. EFIO Representatives (EORs)

An EOR can essentially perform any task other than signing the certification statement, which must be done by an authorized official of the EFIO. These tasks include initially registering the EFIO, obtaining information from providers, submitting and downloading files from NPPES, and working with the Enumerator to resolve discrepancies. (Even though the authorized official must sign the certification statement, he/she need not perform the initial on-line registration.)

The EFIO can have an unlimited number of EORs; moreover, an EOR need not be an actual employee of the EFIO.

Each new EOR must go on-line to the EFI website at <https://nppes.cms.hhs.gov> to obtain a user ID and password. Once these are activated by the Enumerator, the EOR will receive an e-mail from NPPES notifying him/her that he/she can now log into the system and begin submitting and retrieving files. Note that the authorized official need not enter the prospective EOR's data into NPPES, nor must he/she give prior notification to the Enumerator that the EFIO is adding an EOR; this is because the authorized official attests in the certification statement that all EORs have the legal authority to act on the EFIO's behalf. However, the Enumerator reserves the right to contact the authorized official to ensure that the EOR has the authority to act on behalf of the EFIO.

There may be situations where an EOR has left the EFIO or is no longer authorized to act on its behalf. Per the certification statement, the authorized official must notify the Enumerator "promptly" of such changes. The format of notification (e.g., letter, telephone) as well as the individual responsible for notifying the Enumerator is left to the EFIO's discretion. Once the Enumerator receives such notification, it will deactivate the EOR's user ID and password.

B. PREPARING AND SUBMITTING FILES TO NPPES

The XML format is currently the only available format for submitting files to NPPES via EFI. (The file must also be submitted in a Zip format.) As such, if a group of only a few providers is seeking NPIs, it may wish to consider simply submitting paper or web NPI applications as opposed to utilizing the EFI process.

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The EFIO is responsible for ensuring that all required data elements on the XML schema are completed and that all data furnished is accurate. This will reduce the chances that the file will be rejected. To assist the EFIO in preparing files for submission, the EFI Technical Companion Guide and the EFI User Manual contain highly detailed information on how to understand and utilize the XML format. (We recommend reviewing Chapter 8 of the User Manual before reading the Technical Companion Guide.) Both documents are available on the CMS NPI website, and will be updated over time.

The provider data elements in the XML file are identical to those on the current NPI paper application. They include, but are not limited to:

- a. Provider Name (full name for individual providers; legal business name for organizational providers)
- b. Date, State, and Country of Birth (individual providers only)
- c. Gender (individual providers only)
- d. Employer Identification Number (organizational providers only)
- e. Mailing Address
- f. Primary Practice Location Information
- g. Telephone Number
- h. Taxonomy Code
- i. License Information (certain individual providers only)
- j. Authorized Official Information (organizational providers only)
- k. Contact Person E-mail Address

Because of the precision inherent in the XML schema, we recommend that each EFIO submit files according to the guidelines below:

- The EFIO should first send only one file to NPPES containing no more than 25 records. By doing this, the EFIO will be able to ensure it has

correctly formatted and submitted a file. If the file is rejected, the data for only a relatively few number of providers will need to be resent.

- After downloading from NPPES the return file described above, the EFIO should submit no more than three files to NPPES in a one-week period, with each file containing no more than 1,000 records. By doing this, the EFIO will further ensure its capability to successfully send acceptable files to NPPES and to download files from NPPES without incident.
- After success with the above actions, the EFIO can submit files with no limitations on the number of files that can be submitted during any particular time period. The files may contain up to 25,000 records.

We highly recommend that the above steps be followed. EFIOs should be aware that more frequent submission of files, and the submission of files that are larger and more voluminous than those described above, drastically increases the risk that their files will be rejected or that a large number of records therein will pend.¹

In addition:

- **Types of Records within a File** - Every record in a file must be of the same type (i.e., all initial applications or all changes). A single file cannot contain both initial applications and changes.
- **Preventing Duplication** – At this time, there is no way for the EFIO – prior to submission of a file – to check NPPES to see if any of its providers already have NPIs. Nevertheless, we encourage EFIOs to take other reasonable steps to ensure that the providers for whom they are submitting

¹ As stated above, the XML schema can be found on CMS’s NPI website. The schema is in a PDF format. Users may therefore encounter additional “carriage return” (<Enter>) characters when the end-of-line is reached by a particularly long element name. To illustrate:

<xs:element name="CMS274_HealthCareProviderInformationProviderSiteGroup"> becomes

<xs:element name="CMS274_HealthCareProviderInformationProviderSiteGroup">.

As such, a user who tries to retrieve the XML schema by doing a “Select All” on the PDF may have to manually remove these extra carriage returns before being able to use the schema.

initial applications do not already have NPIs. The EFIO should not request an NPI for any provider that already has one.

C. PROCESSING THE FILE AND RESOLVING DISCREPANCIES

1. Uploading Files

When the EFIO successfully uploads a file to NPPES, the system will send an e-mail to the EFIO acknowledging the upload. In addition, NPPES will assign the file a unique identifier name. When retrieving/downloading the file at a later date, the EOR can use this NPPES-assigned name or the name under which the file is stored on his/her computer. To alleviate confusion, however, we recommend that the EOR use the NPPES-assigned name.

NPPES does not send each provider an interim notice stating that its application has been submitted. The EFIO, however, is free to send such notices to providers on its own volition.

2. Rejection of Files

A file will be rejected and returned to the EFIO if more than 15 percent of the records in the file contain errors. The errors that count toward the 15% threshold include field edits (e.g., are all the required data there?), validation errors (e.g., are the data submitted correct?), and duplicate checks (e.g., both within the file and against the database).

Records that are "pending" for Enumerator review - meaning that the record has a discrepancy requiring Enumerator examination - count toward the threshold limit. Note that CMS may increase or decrease the 15% threshold based on volume.

If a file it submitted is rejected, the EFIO should examine those records that were deficient, contact the affected providers as needed, and resubmit the entire file to NPPES. Since NPPES will not furnish any details on which or how many records failed and for what reason, the EFIO should review the file it

submitted (and ostensibly still has in its own system) to help uncover this information.

3. Return Files

Each pended and rejected record in the return file will contain the applicable status code. (For more information on the status codes, see Chapter 9 of the EFI User Manual.) The return file will also contain all the data that was submitted with additional information for each record, such as the NPI (if the provider was enumerated).

4. Pended Records

When a file is being processed and a particular record hits an edit and is kicked out (e.g., bad SSN), the system does not verify the rest of the data in that record. Rather, it immediately pends the record after the first error and flags it with the appropriate error code for resolution. This means, in effect, that once the error is resolved, another error could arise when the record is run through NPPES again, necessitating the resolution of that error as well. However, an error in one record has no effect on the processing of the remaining records in the file.

5. Error Resolution

The Enumerator will attempt to resolve those records that have been pended and may contact the EFIO if it needs the latter's assistance in resolving a particular discrepancy. The EFIO is not prohibited from taking steps on its own to resolve such errors. This includes contacting the provider for further clarification if needed. If the EFIO chooses this course, however, it must promptly notify the Enumerator concerning any matters the former has independently resolved. In other words, the EFIO can – without being asked to by the Enumerator - assist the latter in resolving discrepancies. Yet the Enumerator is ultimately responsible for all final resolutions, including making all necessary corrections in NPPES. Thus, if the EFIO independently resolves a particular discrepancy, it cannot “resubmit” the record in question. Instead, it must contact the Enumerator and notify it of the matter.

When the Enumerator contacts the EFIO for assistance in resolving problematic records, the EFIO – per the certification statement – must respond to the Enumerator “promptly,” though it may do so in a piecemeal fashion. (In other words, it can respond to the Enumerator on a particular record as soon as it is resolved with the provider. The EFIO need not wait for the other records to be resolved.) The Enumerator reserves the right to reject a particular record if it does not receive appropriate clarification from the EFIO in a prompt manner.

6. Notifying Providers of their NPIs

The certification statement requires the EFIO to notify each provider “promptly” of the results of the provider's application once it receives the NPI or rejection notice for that provider. The format for notification is left to the EFIO’s discretion (e.g., letter, e-mail), though the ideal mechanism would be via a written communication that includes the NPI (if assigned), reason for rejection (if applicable), provider name, address, and other pertinent information.

In situations involving providers on whose behalf the EFIO submits a request to change the provider’s existing NPI information, the EFIO must promptly inform the provider of the confirmation of the change. The EFIO can use whatever format (e.g., letter, e-mail) it chooses for the notification.

D. CHANGES OF INFORMATION

There are two ways that a provider can notify NPPES of changes to its NPI data. The provider can make the change itself by visiting <https://nppes.cms.hhs.gov>, creating a user ID and password, and submitting the changed data. Conversely, the EFIO and the provider may have an understanding whereby the EFIO will submit all updated information on the provider to NPPES via EFI. In fact, even if the EFIO and the provider agree that the former may submit changes on the latter’s behalf, the provider still retains the right to go on-line, create a user ID and password, and submit the change himself; this will not affect the provider's ability to utilize the EFI process at a later date.

Note that once the EFIO sends the NPI to the provider, the question of what obligation – if any - the EFIO still has to the provider is left to the two parties

themselves to resolve. They can certainly agree to have the EFIO submit all future changes to NPPES. However, it is ultimately the provider's responsibility to ensure that any updated information is furnished to the Enumerator.

E. OTHER EFIO RESPONSIBILITIES

- **Maintenance/security of files** – Per the certification statement, the EFIO must maintain all files, certification statements, etc., for a period of seven years, unless CMS prescribes a shorter period.
- **Termination of Agency Relationship** – The EFIO is not required to notify the Enumerator of the termination of any agency relationship it has with a particular provider; this is a matter between the EFIO and the provider. For instance, suppose the EFIO has ten providers for which it regularly submits changes of information to NPPES. One of the providers no longer wants to use the EFI process to submit changes to NPPES, essentially terminating the EFIO agency relationship. The EFIO need not notify the Enumerator of the cessation of the agency arrangement.
- **Voluntary Deactivation** – Notwithstanding the reference to “deactivation” in the certification statement, EFI cannot at this time be used to deactivate a provider’s NPI.
- **Involuntary Deactivation** - An EFIO or the EOR may have their ID or password deactivated involuntarily if: (1) the EFIO or EOR does not use their respective IDs for a period of 12 consecutive months, or (2) the Enumerator has reason to believe that the ID is being used by someone other than an EOR.
- **Dissemination of NPIs** - Per the certification statement, the EFIO can only disseminate a provider's NPI for purposes permitted under Federal or State law.

VI. CONTACT INFORMATION

If the EFIO or an EOR runs into problems using the EFI process (e.g., difficulties with passwords, the XML file) or otherwise has questions about the process, they can contact the NPI Enumerator at any of the following:

1-800-465-3203 (NPI Toll-Free)

1-800-692-2326 (NPI TTY)

customerservice@npienumerator.com