

Supporting Statement for Paperwork Reduction Act Submission

Certification Statement for Electronic File Interchange Organizations (EFIOs) that submit National Provider Identifier (NPI) data to the National Plan and Provider Enumeration System (NPPES) (CMS-10175)

A. BACKGROUND

Health care providers can currently obtain a National Provider Identifier (NPI) via a paper application or over the Internet through the National Plan and Provider Enumeration System (NPPES). These applications must be submitted individually, on a per-provider basis. The Electronic File Interchange (EFI) process allows provider-designated organizations (EFIOs) to capture multiple providers' NPI application information on a single electronic file for submission to NPPES. (This process is also referred to as "bulk enumeration.") To ensure that the EFIO has the authority to act on behalf of each provider and complies with other Federal requirements, an authorized official of the EFIO must sign a certification statement and mail it to the Centers for Medicare and Medicaid Services (CMS).

B. JUSTIFICATION

1. Need and Legal Basis

The administrative simplification provisions of the Health Insurance Portability and Accountability Act (HIPAA) of 1996 (P.L. 104-191) require the Secretary of Health and Human Services to adopt a standard identifier for all health care providers (regardless of whether they bill Medicare or not) 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 on 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 health plans. As of the date of this request, over 2 million providers are believed to be "covered entities" under HIPAA and must obtain NPIs prior to May 23, 2007. Another 3 million health care providers are eligible for NPIs.

As explained above, the EFI process allows organizations to submit NPI application information on large numbers of providers in a single file. Once it has obtained and formatted the necessary provider data, the EFIO can electronically submit the file to NPPES for processing. As each file can contain up to approximately 25,000 records, or provider applications, the EFI process greatly reduces the paperwork and overall administrative burden associated with enumerating providers.

2. Purpose and users of the information

It is essential to collect this information from the EFIO to ensure that the EFIO understands its legal responsibilities as an EFIO and attests that it has the authority to act on behalf of the providers for whom it is submitting data. In short, the certification statement, which must be signed by an authorized official of the EFIO, serves as a safeguard against EFIOs attempting to obtain NPIs for illicit or inappropriate purposes.

3. Improved Information Techniques

This collection lends itself to electronic collection methods. However, until CMS adopts an electronic signature standard, EFIOs are required to submit to CMS a hard copy of the certification statement with an original signature.

4. Duplication and Similar Information

There is no duplicative information collection instrument or process.

5. Small Business

These forms will affect small businesses. However, it is likely that the overwhelming preponderance of EFIOs will be large organizations that either employ or represent substantial numbers of providers. Moreover, the certification statement collects a minimum amount of information on a one-time basis, so the impact on small business should be negligible.

6. Less Frequent Collections

This information is collected from each EFIO only once. The certification made by the EFIO remains in effect for the entire period of time in which the EFIO acts in such capacity.

7. Special Circumstances

There are no special circumstances associated with this collection.

8. Federal Register Notice/Outside Consultation

The 60-day Federal Register notice published on October 10, 2008.

9. Payment/Gift to Respondents

N/A.

10. Confidentiality

CMS will comply with all Privacy Act, Freedom of Information laws and regulations that apply to this collection. Privileged or confidential commercial or financial information is protected from public disclosure by Federal law 5 U.S.C. 522(b)(4) and Executive Order 12600.

11. Sensitive Questions

There are no sensitive questions associated with this collection.

12. Burden Estimate (hours)

The total annual hour burden for the respondents is 300 hours. This is based on the following estimates regarding the hours associated with completing the certification statement:

100 respondents @ 3 hours each = 300 hours

Hours associated with and costs to the respondents are calculated based on the assumption that each EFIO will consult legal counsel before signing the certification statement.

The total cost to all respondents is \$45,000. This is based on the following estimates:

300 hours @ \$150.00 per hour (professional wage) = \$45,000

The cost per respondent has been determined using \$150.00 per hour professional wage.

13. Cost to Respondents (Capital)

There are no capital costs associated with this collection.

14. Cost to Federal Government

The cost to the Federal government is estimated as follows:

100 certification statements @ 3 hours each = 300 hours

Hours associated with and costs to the Federal government are calculated based on the assumption that government personnel will enter the submitted data into NPPES; activate the EFIO's account allowing it to submit files to NPPES; perform any necessary verification activities; and file away the certification statement.

15. Changes in Burden/Program Changes

Due to the fact that the majority of health care providers utilize the National Plan and Provider Enumeration System (NPPES) web application in order to obtain their NPIs or submit updates/changes to their existing NPPES data and most existing providers now have their NPIs,

the burden associated with the Electronic File Interchange Organizations (EFIOs) certification statement (CMS-10175) has significantly decreased. In addition, the majority of organizations that would likely ever be EFIOs have already registered, completed the certification statement and are approved to submit EFI files; therefore, the number of respondents have greatly decreased. The EFIO certification statement form (CMS-10175) is still required for new EFIOs who wish to submit EFI files on behalf of health care providers who wish to obtain NPIs or wish to have an EFIO submit updates/changes on their behalf.

16. Publication/Tabulation

N/A.

17. Expiration Date

We are planning on displaying the expiration date.

18. Certification Statement

There are no exceptions to item 19 of OMB Form 83-I.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not use any statistical methods.