

**Disclosure of National Provider Identifiers (NPIs) by Health Care Industry Entities
to
Other Health Care Industry Entities**

We are aware that some entities within the health care industry, such as health plans and some large provider organizations, would like to disclose health care providers' National Provider Identifiers (NPIs) to other health care industry entities for purposes of using NPIs in Health Insurance Portability and Accountability Act (HIPAA) standard transactions. This issue is not the same as the issue of the Department of Health and Human Services (HHS) disclosing health care providers' NPIs from the National Plan and Provider Enumeration System (NPPES). That dissemination policy will be described in a Notice that will be published in the Federal Register.

Health care providers can disclose their NPIs to anyone they choose. The NPI Final Rule requires covered health care providers to disclose their NPIs to any entities that request the NPIs for use of those NPIs in HIPAA standard transactions. Covered health care providers with subparts that have NPIs must ensure that the subparts comply with this disclosure requirement as well.

Health plans and other health care industry entities may disclose health care providers' NPIs in directories and listings for dissemination to other health industry entities for purposes of using the NPIs in HIPAA standard transactions.

While disclosures of health care providers' NPIs by health care industry entities to other health care industry entities for purposes of using NPIs in HIPAA standard transactions do not appear to violate any Federal laws, the entities making such disclosures should ensure that such disclosures do not violate any State laws.

We encourage health care industry entities who plan to make disclosures described above to ensure that the affected health care providers are aware, beforehand, of these plans and that the affected health care providers do not object to such disclosures. If disclosures are made without the affected health care providers' knowledge or consent, the entities making the disclosures could be faced with adversarial actions on the part of any or all of the affected health care providers.