

## Clarification on the PEMS CHOW Process

*Last updated on 11/3/2025*

This is a clarification to the article titled "[Updates for CHOW Available in PEMS Effective June 30, 2023](#)," which was published on tmhp.com on May 19, 2023.

This article provides more information to providers about the Provider Enrollment and Management System (PEMS) change of ownership (CHOW) process.

### CHOW With Different NPIs

If the buyer (new owner) and seller (old owner) have different National Provider Identifiers (NPIs), the following procedures apply:

- If the NPI or Atypical Provider Identifier (API) of the new owner—listed as a current owner on the PEMS Ownership/Controlling Interest page—is already enrolled in PEMS, the new owner must submit a **PEMS-Existing Enrollment** application using that NPI/API.
- If the new owner's NPI or API is *not* yet enrolled in PEMS, the new owner must submit a **PEMS-New Enrollment** application under the new NPI.

**Note:** After the application has been finalized, the previous NPI will be disenrolled. If any claims are submitted using the old owner's NPI for dates of service after the CHOW's effective date, the services will not be reimbursed. Providers must use the new NPI to submit claims for services that are provided after the CHOW effective date. They should use the old NPI to submit claims for services that are provided before the CHOW effective date.

### CHOW With the Same NPI

If the buyer (new owner) and seller (old owner) share the same NPI and the buyer does not have an active enrollment that is associated with that NPI or API, the buyer must submit a **PEMS-New Enrollment** application. Submitting a **PEMS-New Enrollment** application will establish a new profile for the same NPI, which will reflect the updated ownership. The previous profile, which represents the former ownership, will be disenrolled.

The following table lists the appropriate PEMS application type for each CHOW scenario:

NPI/API Change?	PEMS Application Type
No	New Enrollment
Yes, and the new owner's NPI/API is active in PEMS	Existing Enrollment
Yes, and the new owner's NPI/API is <i>not</i> active in PEMS	New Enrollment

## Criteria for CHOW

Some scenarios may appear to be a CHOW but do not meet the criteria for a true CHOW. It is essential to verify whether a true CHOW has occurred by reviewing the criteria that are listed in the Code of Federal Regulations [§489.18 Change of ownership or leasing: Effect on provider agreement](#).

The following scenarios are not CHOWs:

- Stock transfers and corporate mergers
- Changes of information such as changes of principals or controlling interest

**Note:** Changes of information should be reported through the **PEMS-Maintenance – Ownership/Controlling Interest** transaction type.

## Resources

Providers can refer to the following resources for more information:

- The [What Is a CHOW?](#) video on the TMHP YouTube channel
- The "[Long-Term Care \(LTC\) Change of Ownership \(CHOW\)](#)" article
- The "[CHOW Requirements Changing for High Screen Risk Providers](#)" article

## Contact Information

For more information, call the TMHP Contact Center at 800-925-9126 or the TMHP-CSHCN Services Program Contact Center at 800-568-2413.