

Independent CRNA Practice Startup Checklist

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For CRNAs forming a group or working as independent contractors. Requirements vary by state and payer; use this as a planning list and get legal, tax and billing advice.

Before you start

- ☐ Check your state's scope of practice and whether it has opted out of Medicare physician supervision.
- ☐ Talk to the facilities you'll cover: volume, payer mix, stipend needs and contract length.
- ☐ Model cash flow: enrollment can take months before payments start.

Business setup

- ☐ Form your entity (often a PLLC or professional corporation) and get an EIN.
- ☐ Open a business bank account.
- ☐ Get a Type 2 (organizational) NPI for the group; keep your Type 1 individual NPI current.
- ☐ Set up accounting and payroll.

Licensing and credentials

- ☐ Active RN and APRN licenses in every state you'll practice.
- ☐ NBCRNA certification current (note MAC requirements).
- ☐ DEA registration where required, one per state of practice.
- ☐ CAQH Provider Data Portal profile complete and attested.

Payer enrollment

- ☐ Enroll the group in Medicare (CMS-855B) and each CRNA (CMS-855I, including reassignment of benefits).
- ☐ Enroll in your state Medicaid program and managed care plans.
- ☐ Apply for commercial contracts early; credentialing can take 90 to 180 days.
- ☐ Set up electronic funds transfer and remittance with each payer.

Contracts and insurance

- ☐ Facility anesthesia services agreement: coverage, call, exclusivity, stipend, term and termination.
- ☐ Malpractice: occurrence vs claims-made, limits, tail coverage.
- ☐ Business, cyber and workers' comp insurance.
- ☐ Contractor agreements for any 1099 CRNAs, reviewed by a lawyer.

Billing and getting paid

- ☐ Choose who bills: in-house or a specialist anesthesia billing company.
- ☐ Sign a business associate agreement (HIPAA) with your biller.
- ☐ Confirm anesthesia time capture, modifiers (QZ, QK, QX) and documentation standards.
- ☐ Agree on monthly reporting: net collection rate, denials, days in A/R.
- ☐ Review your first 90 days of claims closely.

Ongoing

- ☐ Track license, certification and DEA renewal dates.
- ☐ Revalidate Medicare enrollment when due.
- ☐ Review payer contracts yearly.

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