



NPI Implementation in the Pharmacy Industry

Testimony

by

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NPI Implementation Caremark PBM Status

- All systems ready for 5/23/07 implementation
- 50% of pharmacy software vendors have completed certification
- Transition period begins February 07
- Testing with:
 - Clients
 - Pharmacies
 - Software vendors
 - Switches



NPI Implementation Caremark Pharmacy Status

- Caremark pharmacies
 - All pharmacies have NPIs
 - All pharmacies ready to submit pharmacy NPIs by 5/23/07
 - Problems obtaining physician NPIs
- Physicians
 - Physician databases do not have NPIs
 - No published NPI Dissemination Notice and procedures
 - Physician uptake of NPI has been low



NPI Implementation Industry Status - General

- Two key fields
 - Service Provider ID
 - Prescriber ID
- Provider
 - Generally a pharmacy
 - Mandatory field
 - Status: YELLOW
- Prescriber
 - Generally a physician
 - Optional field
 - Required by some clients – Medicare Part D
 - Status: RED



NPI Implementation Industry Status - Pharmacy

- Chains
 - 93 % have NPIs and have provided to NCPDP
 - NCPDP calling remaining chains
 - Caremark testing with key chains
- Independent pharmacies
 - NCPDP missing 25,000 pharmacy NPIs
 - Distribution of NPIs to payers
 - Software vendors ready
 - Software updates must be made by pharmacies
- Common Problem
 - Obtaining physician NPIs



NPI Implementation Industry Status – Physician

- NPI is a major problem for all pharmacies
- Absence of NPI dissemination rule
 - Physician reluctance to apply for NPI
 - Physician reluctance to share NPI
- Data Vendors do not have access to NPIs
- No industry sources for physician NPIs
- Clients requiring prescriber NPIs will experience massive patient disruption



NPI Implementation Recommendations

- Dissemination rule should be released immediately
- Dissemination rule to make NPIs/NPPES data available to data vendors
- Industry-wide campaign to independent pharmacies
- Evaluate contingency plans
 - 12 month extension
 - How to bill Medicare Part D without prescriber NPIs?