NCVHS
Subcommittee on Standards and Security
"NCPDP NPI Update"

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1

Value of NPI to Pharmacy Sector

- Identification of individual prescribers
- Identification of individual pharmacists for medication therapy management services
- NCPDP currently enumerates pharmacies with unique identifier
  - NCPDP Provider ID
  - Value of NPI not apparent
- Potential use as e-prescribing identifier

NCPDP as Current Enumerator

- Enumerating pharmacies with NCPDP Provider ID for 25 years
- One pharmacy, one number policy
- NCPDP Pharmacy Database
  - Contains information historically used by industry
  - Relationships, demographic information, state license number, DEA, etc.

NCPDP as EFIO

- NCPDP asked industry if NCPDP should play role of "bulk enumerator"
  - Received "pledges" from over 45,000 pharmacies
  - DoD, IHS, Major chains, PSAOs
  - Database crosswalk critical to industry

- Modified Pharmacy Database to accommodate NPI information

EFIO Activities to Date

- Beta tested with NPPES in February
  - Sending and receiving files
  - Adds
  - Resubmission of rejects
  - High incidence of pended records to enumerator
- Not yet tested:
  - changes and deactivation or terminations, reinstatements
- Pharmacies verifying their NPI-required information with NCPDP
  - Paper forms
  - Excel template for chains

EFIO Activities to Date

- **Pharmacy Authorization Statement drafted**
  - Application Form for independent pharmacies
  - Blanket authorization for chains
  - Grant NCPDP permission to distribute NPI on Database
- **Preparation for bulk enumeration prior to "Live Date"**
  - Minimize time to enumerate
  - Unsure of turn-around time for records pended to Enumerator or volume or pended records
  - Maximize time for testing

Pharmacies and Subparts

- A chain could consider each pharmacy as subparts (same EIN)

- As organizations, individual pharmacies can obtain subparts (same EIN, different taxonomy)

- Medicare Part D business needs have resulted in payers requesting pharmacies obtain additional NCPDP Provider IDs for lines of business (e.g. community/retail and LTC)

- General concern and confusion regarding subparts in industry

Pharmacies and Subparts

- As the current de facto pharmacy enumerator, NCPDP has policy of one pharmacy, one number

  - Initial analysis of NCPDP Telecommunication Standard v5.1 Standard shows sufficient information for payers under Part D

- NCPDP-WEDI White Paper on "NPI and Pharmacy Services Sector" provides guidance that pharmacies should obtain only one NPI number

Pharmacies and Subparts

- If pharmacy requests additional NPI, as EFIO, NCPDP will explore business reason
  - educate and recommend
  - "manage" number of pharmacies with multiple NPIs
- NCPDP will maintain a one-to-one relationship between the legacy NCPDP Provider ID and NPI to avoid industry disruption
- If needed, future versions of NCPDP Standard could contain taxonomy or other data elements to avoid multiple NPIs per pharmacy
  - Achieve true administrative simplification – if its not too late

Use of NPI on Transactions

- **On NCPDP Telecommunication Standard Transactions**
  - Supports pharmacy and prescriber or pharmacist identifiers through use of ID qualifiers

- **On Paper Transactions**
  - NCPDP Universal Claim Form (UCF) can accept both pharmacy and prescriber NPIs

Use of NPI on Transactions

- **On X12 835 Remittance Transactions**
  - Identifier used on NCPDP Telecommunication Standard will be returned on 835 during transition. NPI only after Compliance Date
  - Consolidated 835 for all chain stores may require an NPI for the parent organization
- **On e-Prescribing SCRIPT Messages**
  - NCPDP has been told CMS pilots not using NPI as identifier
  - Proprietary numbers continue to be used that include location routing information

Use of NPI on Transactions – Key Issues

- NCPCP Telecommunication Standard v5.1 does not have a "dual identifier" option
  - Transaction Plan has been drafted in NCPDP-WEDI NPI White Paper
    - Transition Plan testing window narrowing
  - NCPDP will facilitate industry outreach on payer and provider readiness

Use of NPI on Transactions – Key Issues

- **Telecommunication Standard is a real-time transaction**
  - Most payers require the prescriber be identified on the prescription claim
  - Pharmacies need an efficient method of obtaining prescriber NPIs
    - Calling prescribers will likely result in service disruption
    - NPIs on prescription pads may not be possible
    - Traditional prescriber identifiers such as DEA, Medicaid or State license numbers may not be available on NPPES for crosswalking

NCPDP and NPI Dissemination

- Awaiting Dissemination Notice
  - May NCPDP continue to provide industry with NCPDP Pharmacy Database and include pharmacy NPIs?
    - Database used by PBMs and payers including CMS
  - May NCPDP include NPI on HCIdea Prescriber Database?
    - Feasibility of providing web tool for pharmacies to obtain prescriber NPI in real time
    - Web access currently available to DoD
    - Data elements available for mapping

NCPDP Outreach Activities

- **Participating with WEDI**
  - NPI Outreach Initiative
  - Joint White Paper on the NPI in the Pharmacy Services Sector
  - Other WEDI White Papers
- **Conference Presentations on EFIOs**
- **EFIO Outreach Activities to Pharmacy**
  - Encouraging pharmacies to *wait* for bulk enumeration