



## NCPDP Testimony of 06/2012 - Lessons Learned Testimony

### Industry Outreach/Education:

Prior to the approval of the Telecommunication Standard Version D.Ø, the NCPDP SNIP Committee began the task of educating the industry by creating a change log showing the modifications made since the NCPDP Telecommunication Standard Version 5.1.

The NCPDP Telecommunication Standard Version D.Ø ballot was released on January 12, 2007. At the February 2007 WG meetings 99 comments were adjudicated resulting in a recirculation of the ballot. In June 2007, the D.Ø Standard was approved.

Education and outreach occurred from January 2007 through June 2007 and consisted of:

- Four webinars were conducted during the months of January and February 2007
- Creation of surveys
- Presentations at industry events

NCPDP continued education and outreach prior to and after the naming of D.Ø in the January 16, 2009 final rule.

- Published NCPDP *HIPAA Standards Implementation Timelines - Version 1.Ø White Paper* in May 2008
- Published NCPDP *Payer Sheet Template Implementation Guide for Version D.Ø - Version 1.Ø* in August 2008 which was updated through August 2011
- Educational presentations at industry events May 2008 through May 2012
- Industry readiness surveys conducted November 2009 and September 2011
- Conducted five webinars March through November 2010
- Created an industry self-reporting readiness tracking document February 2009
- Published NCPDP *HIPAA Standards Implementation Timelines - Version 2.Ø White Paper* in March 2009 with an updated timeline
- Outreach to State Medicaid Directors April 2011
- Published NCPDP *Telecommunication Standard Version D.Ø Transition Guidance version 1.Ø* July 2011
- Conducted additional webinar on coordination of benefits August 2011

NCPDP ongoing education and outreach:

- WG1 Telecommunication FAQ Task Group – answers questions from the industry related to the Telecommunication Version D.Ø implementation
- WG1 Coordination of Benefits Task Group – answers questions from the industry related to coordination of benefits processes
- Version D.Ø Editorial Document – updated quarterly as a result of industry approved answers/recommendation for questions on the Telecommunication Standard Version D.Ø implementation, which includes but not limited to coordination of benefits, Long Term Care and Medicare Part D



As a result of industry education and communication efforts, as well as the defined stages of the HIPAA Transaction Standard regulation the industry achieved a better rate of on-time compliance.

**Lessons learned:**

CMS communication efforts are required to engage all entities (those identified as outliers from previous standard implementation processes) early in the process.

It was observed that the entities that participated in NCPDP meetings, Task Groups and attended the webinars had a higher level of success at installing the revisions required for vD.Ø. Those that participated in the development had a much broader knowledge of why the changes were made and what was required for implementation. Lack of participation in the standards process resulted in a lesser degree of success and higher incidence of complications while implementing the Standard.

The entities who took advantage of the year transition period identified issues when transacting with a small number of trading partners, which provided the ability to make corrections before large claims volumes were processed. It was observed that those entities that did not participate during the transition period and did not conduct external testing experienced a large number of production issues impacting patient care.

Some of the entities that did not participate in external testing as recommended encountered issues meeting the compliance date.

A Payer Sheet Template was created which helped processors communicate vD.Ø requirements in a standard format to their providers; more detailed instructions could have been provided for its use. NCPDP will update the implementation guide for the Template.

Although the regulations included different stages of compliance, some entities within the industry did not adhere to the stages. This resulted in those entities not working through the transition period and subsequently were not ready prior to or as of the compliance date. More oversight during the process would help to assess compliance for the industry and allow for sufficient time to evaluate the enforcement date.

Add language to the front matter of the Implementation Guide encouraging entities to stay involved in industry discussions to be aware of implementations issues and resolutions as the industry implements. The Editorial Document is used to provide guidance on implementation issues. NCPDP will update a future version of the implementation guides.

Due to other industry required implementations occurring at the first of the year some entities were not ready to comply with the HIPAA Standards. It is recommended that the compliance date not be associated with the January 1 date.