

Review of Proposed Operating Rule- Part 1

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What is NCPDP

- NCPDP is a not-for-profit, American National Standards Institute (ANSI)-accredited, Standards Development Organization (SDO) with over 1,500 members representing virtually every sector of the pharmacy services industry.
- NCPDP is a member-driven organization. Our diverse membership provides leadership and healthcare business solutions through education and standards, created using the consensus-building process.
- NCPDP's standards have been named in various government legislation, such as the Health Insurance Portability and Accountability Act (HIPAA), Medicare Modernization Act (MMA) and the Health Information Technology for Economic and Clinical Health (HITECH) Act.

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NCPDP – Proposed Operating Rules(ORs)

Business needs of the health care industry the ORs intend to address:

- Standardization of Companion Guide templates
- NCPDP supports the decision to not include data content rules into the latest set of proposed operating rules
 - Transaction data content and its' use is the responsibility of the SDO

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NCPDP – Proposed Operating Rules (ORs)

Efficiency improvement opportunities for administrative and/or clinical processes in health care and strategies to measure impact:

- Not a current concern

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NCPDP – Proposed Operating Rules (ORs)

Potential impact of the ORs to various health care entities on the daily workflow/transaction process; administrative costs, required capabilities and agility to implement the ORs changes

- Cost of implementing a new companion guide which includes notification and distribution to impacted parties
- Acknowledgements
 - NCPDP supports the voluntary use of the ASC X12 999 and 277CA
 - NCPDP does not support the mandated use of a transaction that has not been adopted through the HIPAA process
 - NCPDP recommends the ASC X12 Acknowledgement Reference Model be used to determine when an ASC X12 999 transaction is generated
 - Additional cost and capabilities will have to be built to implement the acknowledgement mandate

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NCPDP – Proposed Operating Rules (ORs)

Potential emerging or evolving clinical, technical and/or business advances the ORs intend to address or facilitate

- NCPDP does not believe the operating rules address or facilitate emerging or evolving clinical, technical and/or business advances for the pharmacy industry

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NCPDP – Proposed Operating Rules (ORs)

Potential impact and/or improvement to health care related data and/or data infrastructure

- No impact to the named transactions since data content rules were not proposed
- If the ASC X12 277CA is mandated, payers/processors and pharmacies will have to support a transaction and its' data content and code sets they don't currently support or have a business need for today.

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NCPDP – Proposed Operating Rules (ORs)

If applicable, do they incorporate privacy, security and confidentiality

- Security requirements for user authentication is included
- Connectivity Rule 470 which supports the next set of transactions requires the X.509 Digital Certificate to be supported by payers
 - Authentication rules need to be consistent across all Phases
 - Additional cost to implement by the payers/processors – will the providers use this method?
- Privacy and confidentiality are not covered

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