



National Committee on Vital and Health Statistics (NCVHS)
Subcommittee on Standards
Hearing on Health Plan Identifier (HPID)

Part 2 – Session B

The National Council for Prescription Drug Programs (NCPDP) is a not-for-profit ANSI-Accredited Standards Development Organization (SDO) consisting of more than 1,500 members who represent drug manufacturers, chain and independent pharmacies, drug wholesalers, insurers, mail order prescription drug companies, pharmaceutical claims processors, pharmacy benefit managers, physician services organizations, prescription drug providers, software vendors, telecommunication vendors, service organizations, government agencies, professional societies, and other parties interested in electronic standardization within the pharmacy services sector of the healthcare industry. NCPDP provides a forum wherein our diverse membership can develop solutions, including ANSI-accredited standards, and guidance for promoting information exchanges related to medications, supplies, and services within the healthcare system.

NCPDP provided testimony in 2010, 2012, and 2014 on this topic and our position has not changed. NCPDP does not have a business requirement for the use of the HPID.

Questions for Panelist

1. What health plan identifiers are used today and for what purpose? Visual work flows are welcome.

The Issuer Identification Number (IIN) and the Processor Control Number (PCN) are used for routing and may not identify the health plan. The HIPAA named transactions are processed by a payer, processor or PBM which are not typically identified as a health plan. Since the health plan is not identified in the claim response, there is no additional benefit for the use of the HPID in the NCPDP HIPAA named transactions. Refer to the Standards Used in the Prescribing Process flow on page 3.

2. What business needs do you have that are not adequately met with the current scheme in use today?

NCPDP does not have a business need for HPID, therefore we believe our current business needs are being met without the inclusion of HPID.

3. What benefits do you see the current HPID model established by the HHS regulation provide? Does the model established in the final HPID rule meet your business needs?

In the past, NCPDP has responded the HPID model does not provide any benefit to the pharmacy claim transaction and this position has not changed.

With regard to your business need question, refer to the answer in Question 2.

4. What challenges do you see with the current HPID model established by HHS?

While the NCPDP transactions have no identified business need for the HPID, based on our previous testimony from 2014, we believe the major challenges are:

- The enumeration process is not clearly defined.
- The required use of HPID is not understood by the industry.

5. What recommendations do you have going forward regarding health plan identifiers and an HPID final rule established by HHS?

Since NCPDP transactions do not have a use for the HPID, we request all NCPDP transactions be exempted.

Standards Used in the Prescribing Process

