New HIPAA Update on NCPDP F2 Telecommunication Claim Standard

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NCPDP Standards

- Telecommunication Version F2
- The Batch Standard
- The Batch Standard Subrogation guide

Significant Changes from D.0 to F2

- Expansion of the BIN/IIN routing identifier field to 8 digits and removal of the BIN.
- Expansion of the Product/Service ID field to 40 characters will support alternate identifiers e.g. UDI.
- A new field total prescribed quantity remaining was added for controlled substance use. This field allows the processor to identify the accumulated prescribed quantity remaining.

Significant Changes from D.0 to F2

- Modified the benefit stage fields to allow usage by other payers and supplemental payers.
- A new grouping of fields was added to the Response Status Segment to allow better communication of help desk contact information.
- Mandated the return of reconciliation ID on approved transactions. The reversal section and guidelines were rewritten to support the use of this field.

Significant Changes from D.0 to F2

- Do Not Dispense Before Date was added to support providers writing multiple, one-month prescriptions for controlled substances as well as state requirements on the number of days a patient has to fill a controlled substance from the date written.
- The situation for quantity prescribed was updated and also added the Prescriber DEA Number to support the controlled substance claims and reporting.

Significant Changes from D.0 to F2

- The coordination of benefits and other payments count was reduced to a maximum count of three.
- A pricing guideline section was added as well as a new COB processing guideline section.
- The controlled substance reporting, reversal, and rebill transactions were removed from the standard.
- The payer ID fields were restructured to allow multiple identifiers to be returned on a single transaction response.

Significant Changes from D.0 to F2

- Enhancements to the Sales Tax to provide clarity around the type of tax/fee submitted and paid as well as tax exemption status. New Pricing Segment fields in the request and response to improve the identification and flexibility of changes related to tax and regulatory fees.
- Eight new fields were added to the response claim segment to support the identification of the reason for formulary alternatives and the identification of required treatment.

Telecommunication Standard F2 Benefits

- Streamline Processes to maintain compliance
- Enhances reimbursement methodologies
- Enhances the availability of information allowing the pharmacy to better communicate to the patient
- Improves workflow automation
- Enhanced patient safety mechanisms
- Improved patient access to care
- Improved analytics
- Increase interoperability

Telecommunication Standard F2 Time Frame for Implementation

Minimum of 3 Years

- Final Rule Publication Date 12/2019
- Used in Production Date 6/2022
- Compliance Date 6/2023

Current Regulatory Status

- NCVHS Standards Hearing on 3-26-2018
  - Payers/PBMs
  - Pharmacies
  - Software Vendors

NCVHS approves submission of letter to Health and Human Services to be sent week of 5-21-2018 recommending adoption of updated standards and also recommends timeline established by SNIP.

Task	# days	# Months	Start	End	Notes
NPRM			11/28/17		
Business Planning	364	12	12/1/17	11/30/18	The business planning activities include such items as: • Determine the Scope • Define the Business Requirements • Identify Budget Requirements including Resources • Perform Risk Assessment • Software Deployment and User Training
Final Rule Published			4/18/18		
Development	425	14	6/1/18	7/31/19	Examples of processes that should be completed within this time period are: • Systems analysis • Coding •Testing (may include but not limited to Unit, Integration, Parallel, etc.) • Infrastructure planning o Hardware o Software o Network
Testing	303	10	11/1/18	8/31/19	During this time frame, the applicable entities which may include trading partners, participate in testing designed to demonstrate the system(s) comply with the requirements of the standard(s). Willing trading partners may engage in testing prior to this period; however, no trading partner can require another trading partner to begin testing prior to the start of this period. Testing may include but is not limited to User Acceptance, End to End, Pre-certification, etc. Issues identified may result in additional development and further testing cycles.
Certification	152	5	7/1/19	11/30/19	During this time frame, the stakeholder would certify with the relevant entities. For example: • Trading Partners • Intermediary • Electronic Prescription for Controlled Substances (EPCS) • ONC Promoting Interoperability Issues identified may result in additional development, further testing and certification cycles.
Software Deployment/User Training	183	6	7/1/19	12/31/19	Certified software will be deployed to end users to be made available for production use as of the applicability date. User training will also occur at this time.
Sunset of v10.6				12/31/19	
Applicability if v2017071				1/1/2020*	Applicability Date: Those provisions are applicable for contract year 2020 (January 1, 2020). E- Prescribing and the Part D Prescription Drug Program; Updating Part D E Prescribing Standards discussed in section II.D.8. of this final rule is applicable January 1, 2020 conditioned on The Office of the National Coordinator for Health Information Technology (ONC) adopting the same standard for use in its Electronic Health Record Certification Program by that date.
Total Duration:		25			
Total	1063				Total duration for the implementation of the NCPDP SCRIPT Standard Implementation Guide Version 2017071 is 25 months. The start dates on the above table show overlap but it is recommended entities begin each task by the start date.