DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

CENTERS FOR MEDICARE & MEDICAID SERVICES
CENTER FOR MEDICARE

CENTER FOR MEDICARE

TO: All Part D Plan Sponsors

FROM: Cynthia G. Tudor, Ph.D., Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Announcement of Prescriber NPI Project and Website Release

DATE: December 4, 2012

In September 2012, the Centers for Medicare & Medicaid Services (CMS) initiated a project with Acumen, LLC (Acumen) to examine the use and validity of prescriber identifiers reported to CMS on Part D Prescription Drug Event (PDE) records for calendar years 2012 and 2013. This project will enable CMS to further assess sponsor compliance with the prescriber identifier reporting requirements finalized in the CMS-4157 Final Rule with Comment (77 FR 22072) published April 12, 2012.

The purpose of this memorandum is to announce the project and the release of the Prescriber NPI Website. This project website will serve as a centralized means for collaboration among CMS, Acumen, and Part D sponsors, allowing sponsors to access reports containing metrics reflecting their prescriber identifier reporting patterns and to discuss questions or concerns with CMS and Acumen. Below, we provide an overview of the project, describe the actions required of Part D sponsors, and outline the project's timeline.

Overview

In 2012, CMS continues to accept any of the following prescriber identifiers: the National Provider Identifier (NPI), Drug Enforcement Administration (DEA) number, uniform provider identification number (UPIN), or State license number, but requires that the identifier be active and valid. For 2013, new regulatory requirements will be effective. In an October 1, 2012 HPMS memorandum titled "Revised Reporting Requirements for Prescriber Identifiers and Other Prescription Drug Event Fields," we announced a two-step implementation process for the new prescriber identifier regulatory requirements. Effective January 1, 2013, we will require sponsors to submit an active and valid NPI on PDE records; however, the NPI reported may be a group identifier if the prescriber has not yet obtained an individual NPI. Beginning May 6, 2013, sponsors will be required to report only a Type 1 (individual) NPI on the PDE record to coincide with the compliance date for CMS-0040 Final Rule (77 FR 54664), published September 5, which specifies the circumstances under which certain organization covered health care providers must require certain prescribers to obtain and disclose an NPI.

Given these changes, Acumen will be utilizing Part D PDE data to assess sponsors' compliance with the reporting requirements effective in 2012 and 2013 and providing information to CMS and sponsors relative to the following key areas:

- Reporting of non-NPIs, including Drug Enforcement Administration (DEA) numbers, Unique Physician Identification Numbers (UPINs), and State License Numbers (SLNs)
- Reporting of invalid or inactive NPIs
- Reporting of Type II (Group) NPIs

The initial reporting phase of this project will provide all Part D sponsors with information regarding their prescriber identifier reporting. Subsequent reporting phases will be targeted for sponsors whose data indicate compliance issues.

Project Expectations

Upon receiving notification from Acumen that the project reports are available, sponsors will be expected to access their reports in a timely manner (that is, within 5 business days of notice from Acumen that the report is available) and review their performance data related to prescriber identifier reporting. Acumen will follow up with sponsors who do not access their reports timely and report those sponsors to CMS. Sponsors must resolve issues identified through their analysis of these reports directly with the pharmacies, claims processors, and/or prescribers associated with the issues, delete PDE records with incorrect, invalid or inactive prescriber identifiers and resubmit corrected PDE records as well as discuss questions or concerns with CMS and Acumen. CMS and Acumen will continue to evaluate sponsors' PDE submissions and will follow up with sponsors with persistent performance issues.

Schedule of Events

The following table summarizes expected actions and timelines for the launch of the Prescriber NPI Website and project.

ACTION	STEP	DATE
AUTHORIZE USERS	**All 2013 Contracts (Contracts Continuing from 2012 and Contracts New in 2013):** Medicare Compliance Officers identify up to five authorized users per contract for Acumen's Prescriber NPI website. For each user, submit contact information through Acumen's User Security Website (see Attachment A for instructions).	No later than December 12, 2012
ACCESS AND REVIEW REPORTS	**Contracts Continuing from 2012:** Review prescriber identifier reporting rates based on 2012 Year of Service data. Conduct follow-up as needed to ensure compliance with reporting regulations.	Beginning in December 2012
	Contracts Continuing from 2012 and Contracts New in 2013: Review prescriber identifier reporting rates based on 2013 Year of Service data. Conduct follow-up as needed to ensure compliance with reporting regulations.	Beginning in March 2013

We appreciate your cooperation with this Prescriber NPI project. For questions regarding the Prescriber NPI Website or reports, please contact Acumen at PrescriberNPI@AcumenLLC.com. For questions regarding project goals or reporting requirements, please contact Deborah Larwood at Deborah.Larwood@cms.hhs.gov or Heather Rudo at Heather.Rudo@cms.hhs.gov.

Attachment A: User Authorization Instructions

To gain access to the Prescriber NPI Website, your contract's Medicare Compliance Officer must authorize the appropriate staff through Acumen's User Security Website. Medicare Compliance Officers must complete the following steps:

1. **Identify individuals who should have access to the Prescriber NPI Website.**
    - Contracts are limited to **five** authorized users for the website.
    - All users will have access to all features of the website, including downloading reports and accessing discussion boards. All users will receive notification of report availability.

2. **Log onto the User Security Website (https://PartD.ProgramInfo.US/User_Security).**
    - If your contract is continuing from 2012, your Medicare Compliance Officer should already have access to the User Security Website through existing work with Acumen.
    - If your contract is new in 2013, your Medicare Compliance Officer should have already received or will soon be receiving a welcome email from Acumen and a letter with login credentials via USPS.

3. **Authorize users.**
    - The Medicare Compliance Officer must submit an Available User Request Form for each proposed user and authorize access permissions for each user.
    - To ensure timely access to the site, Medicare Compliance Officers must complete this user authorization process by **December 12, 2012**.

Following the user authorization process, Acumen will send authorized website users an email with instructions for logging on and navigating the website, and a letter with login credentials via USPS. Users will receive further notice from Acumen when reports are made available.

For assistance or questions regarding the user authorization process, please contact Acumen at PrescriberNPI@AcumenLLC.com or (650) 558-8006.