



## CENTER FOR BENEFICIARY CHOICES

---

**Date:** May 1, 2009

**To:** All Part D Plan Sponsors

**From:** Cynthia Tudor, Ph.D., Director, Medicare Drug Benefit Group

**Subject:** Prescriber Identifier on Part D NCPDP Pharmacy Claims Transactions

CMS has recently released an FAQ related to National Provider Identifier (NPI) and the Prescriber Identifier field on the National Council of Prescription Drug Programs (NCPDP) billing transaction ([FAQ #9100 "After May 23, 2008, is an NPI required for the prescriber ID field on the NCPDP pharmacy transaction?"](#) and also included as Appendix I in this memo). This FAQ clarifies that not all prescribers are covered entities under the NPI rule, and therefore, not all prescribers are required to have an NPI. The FAQ further clarifies that if the prescriber does not have an NPI or the pharmacy cannot obtain a prescriber's NPI, a non-NPI prescriber ID may be substituted on NCPDP pharmacy claims transactions if allowed by the payer.

CMS requires a prescriber ID for all Prescription Drug Events (PDEs), which means that Part D plans must obtain prescriber IDs on all pharmacy claims. CMS emphasizes that plans should make all reasonable efforts to obtain NPIs in the prescriber ID field. Nevertheless, given the guidance provided by the FAQ, Part D plans cannot justify putting enrollees at risk of service interruption by establishing point-of-sale edits that reject pharmacy claims that do not include the NPI in the prescriber ID field. Part D plans must avail themselves of the claims processing flexibility allowed by the FAQ by ensuring that their systems continue to accept non-NPI prescriber IDs (e.g. DEA number, State License number) on NCPDP pharmacy claims transactions. Part D plans should establish alternative policies and procedures outside of their claims processing that address potential non-compliance with NPI prescriber ID requirements on NCPDP pharmacy claims transactions.

To ensure acknowledgement and compliance with this memo CMS will require Part D sponsors to submit an attestation for each contract stating that beneficiary access to Part D drugs will not be hindered as a result of a missing prescriber NPI on a pharmacy claims transaction on or after 5/23/2008. If your organization is not in a position to attest "Yes" at this time (see instructions below), you must provide an explanation in the dedicated space why you are unable to attest to this requirement. We will be contacting all plans about this failure in compliance.

Simultaneous to the release of this memo, CMS is sending an email from [DrugBenefitImpl@cms.hhs.gov](mailto:DrugBenefitImpl@cms.hhs.gov) to each Compliance Officer with the link to the attestation submission tool. Please click on the link in that email to complete and submit the attestation electronically to CMS. See Appendix II for a preview of the attestation. Please note that CMS

will only accept electronically submitted attestations. **Attestation submissions are due by close of business on May 9, 2008.**

We are aware that some organizations will not receive the email due to firewall constraints. If your organization's Compliance Officer did not receive the email notification, or if it more convenient for you, paste the following link into your web browser to access and complete the attestation:

<https://vovici.com/wsb.dll/s/11dc4g3392c>

Please note that your organization's Unique ID for accessing the attestation tool is your CMS contract number (e.g., S1234/H1234). Organizations with more than one contract number may submit an attestation once for each contract number, or alternatively, you may send an email to [drugbenefitimpl@cms.hhs.gov](mailto:drugbenefitimpl@cms.hhs.gov) stating the contract number for which the attestation was completed, and listing the other contract number(s) to which the attestation applies.

Thank you.

## Appendix I

### **FAQ #9100 After May 23, 2008, is an NPI required for the prescriber ID field on the NCPDP pharmacy transaction?**

Question: After May 23, 2008, is an NPI required for the prescriber ID field on the NCPDP pharmacy transaction? If the prescriber's NPI is not available, or the prescriber doesn't have an NPI, but the payer requires the prescriber ID, what alternatives, if any, are available for pharmacies to use to avoid having the transaction and the claim rejected?

Answer: The prescriber identifier field on an NCPDP transaction is a provider identifier field and, as such, should carry an NPI in almost all cases when populated. It is expected that most prescribers will be covered entities and will therefore have an NPI assigned for use on all HIPAA transactions, where required. However, if the prescriber is not a covered entity, s/he may not be required to have an NPI, and may not opt to obtain one voluntarily. Thus, this provider would not have an NPI to include on the pharmacy transaction. If a health plan or other payer rejects a (pharmacy) claim because it does not have prescriber ID, and one is not available to the pharmacy, this presents a potential service disruption problem in point of service billing, which must be avoided when possible.

In the rare cases when either a prescriber does not have an NPI or the pharmacy cannot obtain an NPI, and where the prescriber ID is required by the payer, non-NPI individual identifiers may be substituted if allowed by the payer. In keeping with past practice, if no identifier is available a default identifier may be substituted; providers and pharmacies are encouraged to work with their payers for such default alternatives.

This guidance is expected to be used to cover exceptions. It is not intended to allow routine use of non-NPI identifiers or default identifiers in place of individual prescriber NPIs. Pharmacies are expected to make all reasonable efforts to obtain and utilize the appropriate individual NPIs for prescribers. Payers that elect to utilize the flexibility allowed under this Q&A should monitor pharmacy use of non-NPI and default identifiers to ensure that pharmacies comply with the requirement to use NPI whenever available.

Appendix II

**Prescriber Identifier on Part D NCPDP Pharmacy Claims Transactions**

**On May 1, 2008, CMS released an HPMS memo titled: Prescriber Identifier on Part D NCPDP Pharmacy Claims Transactions. To ensure acknowledgement and compliance with that memo, we are requiring all current Part D sponsors to complete the attestation below for each of their CMS contracts. See the referenced HPMS memo for additional information. Please submit your attestation(s) no later than Friday, May 9.**

\*\*\*\*\*

**Beneficiary access to Part D drugs will not be hindered as the result of a missing prescriber NPI on a pharmacy claims transaction on or after 5/23/2008.**

**Select "Yes" and click on the "Submit Attestation" button to complete the attestation.**

Yes

**If you are not attesting "Yes," you must explain in the text box below why you are unable to attest to this requirement. We will be contacting all plans about this failure in compliance.**

---

---

---

If you require further information on this CMS requirement please contact Craig Miner at 410-786-7937. Thank you for your cooperation.