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Cc: [Schofield, Daniel \(RIS-KOP\)](#); [Terry Fortin](#)
Subject: NCPDP Definition of Valid Prescriber TG - OAP Taxonomy Recommendation
Date: Monday, June 20, 2016 10:01:02 AM

Good Morning Lisa, Jennifer and Alisha,

The NCPDP Definition of a Valid Prescriber Task Group wanted to share the below information with CMS, as this specific prescriber enrollment validation business case may also effect PDE claims processing. The task group reviewed the situation as presented by an industry stakeholder and formulated a recommendation to ensure standardization of processes. This recommendation facilitates alignment of OAP validation via NPPES taxonomy and eliminates conflict as to when a provisional fill would apply.

NPPES Prescriber Taxonomy Examples:

1. **Primary Taxonomy = 175F00000X (Naturopath)**
Secondary Taxonomy = 363LF0000X (Nurse Practitioner, Family Health)
2. Primary Taxonomy = 363LF0000X (Nurse Practitioner, Family Health)
Secondary Taxonomy = 175F00000X (Naturopath)

NCPDP TASK GROUP RECOMMENDATION:

CMS guidance states to use NPPES taxonomy to validate OAP status.

In the situation where a prescriber has multiple taxonomies, validation of OAP status should occur as follows:

1. Check enrollment first, if enrolled, follow enrollment process
2. If not enrolled, prioritize check for OAP taxonomy:
 - a. Primary or secondary designation is not relevant as long as there is an active taxonomy.
 - b. If at least one of the active taxonomy meets the definition of OAP, treat them as OAP.
 - c. Otherwise if none of them are OAP, then determine provisional fill eligibility.

If CMS has any concerns with this recommendation, the task group requests CMS share these concerns with the task group on the next scheduled call. The task group meets every Monday at 11am est. Dial in number is: 1-415-655-0060 Access Code: 919-238-282.

Thank you,

Sharon Gruttadauria, Task Group Leader

Dan Schofield, Task Group Leader

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