

From: Gruttadauria, Sharon E.
To: ["Turner, Eileen \(CMS/CPI\)"](#)
Cc: ["Thorpe, Lisa \(CMS/CM\)"; Eidex, Brian \(RIS-HBE\); "Terry Fortin"](#)
Subject: NCPDP Response to CMS Request for Feedback on Prescriber Enrollment Soft Messaging
Date: Saturday, January 21, 2017 12:38:00 PM

Good Morning Eileen,

One of the discussion topics on the 1/5/2017 CMS Precluded Prescriber call was the feasibility of plan sponsors as of 1/2018, to return soft messaging on claims where the associated prescriber was not on the Medicare enrollment file. Since this soft messaging would be controlled by the available fields within the NCPDP Telecommunication Standard, the NCPDP Prescriber Task Group wanted to provide the following feedback for consideration of next steps.

In order to coordinate any necessary changes to the NCPDP Standard to support soft messaging for non-enrolled prescribers, a better understanding of the objective of the messaging is needed. For example, is the pharmacy provider expected to convey this information to the beneficiary and/or the prescriber? Or is this soft messaging for informational purposes, that in the event the pharmacy elects to support a retrospective prescriber outreach effort.

Based on the objective of the soft messaging, NCPDP may need to develop new code set values that would be used to trigger the designated action. There is a governance process to add new code set values to the NCPDP External Code List, where key steps need to be managed in order to align the NCPDP and CMS timelines.

For Example:

- New Approved Message Code that designates the non-enrolled status on a paid claim response to be available by 1/1/2018
 - Request for this new external code list value would have to be submitted by April 01, 2017
 - NCPDP Work Groups would have to approve the "Emergency ECL Request) at the May 2017 Work Group Meeting
- If the request is pended at the May Work Group meeting (due to dependencies not yet resolved, e.g.: file layout) it would be resubmitted in August 2017
 - If approved in August 2017, then the earliest the new value can be used is April 2018.

The ability to return soft messaging prior to the 1/1/2019 enforcement date is also dependent on the following factors:

- CMS support of the NCPDP file layout recommendations
- Stakeholders ability to complete system development, testing and deployment of prescriber enrollment claims processing rules leveraging the final prescriber enrollment file layout.

Thank you for the opportunity to provide feedback on this CMS initiative. The NCPDP Prescriber Task Group looks forward to working with CMS to discuss this in further detail and ensure coordination of timelines as needed. The Prescriber Task Group meetings are scheduled for Monday's at 11am est (90 minute call). The next set of meetings post the February work group

meeting have not yet been scheduled. Once scheduled, we can forward the calendar invite to any CMS representatives who would like to participate.

Thank you

Sharon Gruttadauria, Task Group Co-Leader

Brian Eidex, Task Group Co-leader

Terry Fortin, NCPDP Staff Liaison

Sharon Gruttadauria | [CVS Pharmacy](#) | Payer Relations | Director Industry Standards | Phone: 401-770-5945 | Fax: 401-652-9955 | One CVS Drive, Mail Code 1090, Woonsocket, RI 02895 | e-mail: | E-mail: Sharon.Gruttadauria@CVSCaremark.com

CONFIDENTIALITY NOTICE: This communication and any attachments may contain confidential and/or privileged information for the use of the designated recipients named above. If you are not the intended recipient, you are hereby notified that you have received this communication in error and that any review, disclosure, dissemination, distribution or copying of it or its contents is prohibited. If you have received this communication in error, please notify the sender immediately by telephone and destroy all copies of this communication and any attachments.