



June 20, 2022

Submitted electronically via email

Michelle Deane, ANSI

RE: NCPDP SNIP Committee Eight Digit IIN and Telecommunication Standard vF6 Risks and Recommendations

Dear Michelle,

NCPDP and the Strategic National Implementation Plan (SNIP) Committee would like to thank you and your colleagues for the very productive discussion during the April 28, 2022, conference call. We would like to take this opportunity to confirm our understanding of the ANSI/ABA healthcare IIN enumeration process and provide some recommendations to reduce any unintended risks.

The objective of the April 28<sup>th</sup> call was to discuss options that may mitigate the NCPDP Telecommunication Claim Billing Transaction routing risks associated to eight-digit IINs within the 01-99 suffix series. These risks are related to the below situations when NCPDP Telecommunication vD.0 Standard is used, where only a six-digit IIN can be supported.

- Grandfathered 00-99 IINs, where the possibility exists that the healthcare entity uses the 01-99 IIN before NCPDP Telecommunication Standard Version F6 is fully implemented to support the eight-digit IIN.
  - Example:
    - Payer IIN = 65432101
    - NCPDP Telecommunication Standard Version D.0 (or lower version) claim billing request is submitted, where IIN must be truncated to six digits
    - Claim request is routed to payer associated to IIN 654321 versus the payer associated to 65432101
- Non-HIPAA covered entities (e.g., state workers' compensation insurance) who do not adopt Telecommunication Standard vF6 and continue to be restricted to using six-digit IINs when using an older version of the Telecommunication Standard.
  - Same outcome as above example, however, this is a longer-term risk that will not be resolved as of the HHS compliance date for Telecommunication Standard vF6.

The above situations will result in real-time claim transaction routing gaps which will cause patient care delays, financial reconciliation barriers as well as protected health information (PHI) compliance risks.

Based on our interpretation of the valuable information you shared, SNIP expects the following to be part of the ANSI/ABA eight-digit IIN transition process.

- Existing six-digit IINs are grandfathered to eight-digit IINs inclusive of the 00-99 series.
  - Example: 654321 grandfathered to 65432100 - 65432199
- As of 2017, requests for new IINs had eight-digit IINs assigned, with only the 00 suffix unless the request was for a block of 8-digit IINs 00-99.

- There is one known healthcare card program entity who requested and received the 00-99 block.
- To date, 66 eight-digit IINs have been assigned under the “61” IIN category (“61” is no longer limited to healthcare entities).
- There are approximately 9,270 eight digit 00 IINs remaining under the “61” IIN category.
  - Based on the volume of requests in the past 5 years, this is an average of 14 requests for new IINs per year.
- ANSI/ABA will continue to only assign “00” eight-digit IINs for the foreseeable future, as there is no immediate risk of running out of distinct numbers at the six-digit level.

While there does not appear to be any immediate risk of 01-99 IINs being used by healthcare entities for routing of claims, in order to prevent unexpected risks, the NCPDP SNIP Committee requests your support with the following recommendations.

**Recommendations:**

- NCPDP SNIP requests an additional box be added to the IIN application next to the “Healthcare” category labeled as “Pharmacy Claim Routing”, so the submitter can confirm their use of the IIN.
- ANSI to notify NCPDP of any new healthcare IIN block holder requests that check off the new box added to the form.
- ANSI to provide proactive communication to NCPDP identifying when 01-99 healthcare IINs will begin to be assigned for entities whose IIN start with a 61 or entities that have checked off the new box for pharmacy claim routing.
- ANSI to clarify the process for an entity with a grandfathered eight-digit IIN to request the use of the associated 01-99 IIN series and to notify NCPDP of these requests.

NCPDP is very appreciative of ANSI and ABA’s support and collaboration to ensure applicable processes are in place to mitigate pharmacy claim transaction routing risks. We look forward to building upon this relationship as digital and real-time electronic technology continues to evolve.

Thank you,  
/s/

Margaret Weiker  
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NCPDP