



August 25, 2022

Michelle Deane  
USA RC Secretary

RE: USA RC N 1081, NCPDP SNIP Committee Eight Digit IIN and Telecommunication Standard vF6 Risks and Recommendations

Dear Michelle,

Thank you for the July 25, 2022 letter that provided responses and clarifications to the NCPDP SNIP questions related to the 8-digit IINs ending in 01-99. The information regarding the grandfathered IINs was especially helpful, allowing NCPDP to provide clarification to the impacted stakeholders.

In an effort of on-going collaboration to mitigate potential gaps in processes, below are the NCPDP responses to the questions at the end of the July 25, 2022 letter.

1. *We understand the NCPDP standard is being updated to 8-digit IINs by June 2025, what is the NCPDP's timeline for its members to migrate?*
  - The NCPDP Telecommunication Standard will begin using 8-digit IINs as of the compliance date of the next HIPAA-named version of this standard. While the original estimate was that this would occur around May 2025, the delay in the release of HHS's Notice of Proposed Rule Making will likely impact this timeline.
  - The HIPAA compliance date only applies to HIPAA-covered entities conducting HIPAA-covered transactions.
2. *Is there a migration period for members to comply?*
  - Historically, the pharmacy industry requested a two year implementation period from the publication date of the Final Rule.
  - As with previous Telecommunication Standard version implementations, HHS may extend the compliance date or its enforcement.
3. *Is it reasonable to assume migration might be accomplished by 2027?*
  - Until the HHS rule making process is completed, NCPDP is unable to estimate 2027 to be a reasonable date for all HIPAA-covered entities to be able to support 8-digit IINs within the HIPAA-named NCPDP Telecommunication transactions.
  - It is also important to note that non-HIPAA-covered entities may continue to use older versions of NCPDP Telecommunication transactions.

NCPDP appreciates your time and assistance with this topic and the on-going opportunity to collaborate on the appropriate timing for the use of the 01 – 99 8-digit IINs.

Thank you,  
/s/

Margaret Weiker  
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NCPDP