



USA RC N 1081

July 25, 2022

Dear Margaret,

Thank you for the letter: *NCPDP SNIP Committee Eight Digit IIN and Telecommunication Standard vF6 Risks and Recommendations*. Members of the US Registration Committee (USA RC) and the ISO/IEC 7812 Registration Authority (RA) met on July 15, 2022 to discuss NCPDP's recommendations outlined in the June 20, 2022 letter.

The committee understands the challenges NCPDP is facing navigating the use of the 8-digit IIN with respect to the NCPDP Telecommunication Standard Version D.0. With respect to the 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.
 - *The committee agrees that this can be added to the "main industry identification question of the application. A sub-check box to the application form will be added to allow applicants to indicate the IIN request is for use in pharmacy claim routing.*
- ANSI to notify NCPDP of any new healthcare IIN block holder requests that check off the new box added to the form.
 - *Neither the ISO/IEC Registration Authority (the American Bankers Association) (RA) nor the ISO/IEC 7812 Secretariat (ANSI) shares any information with any outside entity regarding an application to become an authorized block holder. This maintains the confidentiality of applicants' future business plans.*
- 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.
 - *Neither the RA nor the ISO/IEC 7812 Secretariat would share any information with any outside entity regarding a request for an IIN.*
 - *As previously provided, currently 72,967 eight-digit "61" IINs are assigned (this includes the 'grandfathered' 6-digit IINs that were converted to one hundred 8-digit IINs and the 8-digit '00' IINs that have been assigned after the 2017 version of the standard went into*

effect). In theory, 927,032 eight digit “61” IINs remain available for assignment, or 9,270 six digit ‘00’ IINs.

- For the past five years, the RA has averaged just under 14 assignments per year. Interpreted that may mean it would be quite some time before the RA would need to begin assigning 8-digit IINs ending in ‘01-99’. However, the RA cannot predict if this trend will continue.
- 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.
 - The ISO/IEC 7812 Registration Authority is responsible for the assignment of IINs (not ANSI).
 - Entities that were assigned 6-digit IINs prior to the 2017 version of the standard were grandfathered in January 2017 for the ability to use all of the 8-digit ranges in their particular 6-digit IIN. Example: 611234 became 61123400 – 61123499. The RMG had decided this when the standard changed because it was thought that in all likelihood, the entity was using the numbers in the 7th and 8th positions as part of the account number.
 - Entities after January 2017 have been issued a single, 8-digit IIN. Example: 61123400. These entities are **prohibited** from using 01-99 in the 7th and 8th positions.
 - Once an entity has been assigned an IIN by the RA, that entity is under no further obligation to notify the RA of any information regarding the entity’s card program (exception – they would notify the RA in case of a name and/or address change, or to relinquish the IIN). The RA’s sole responsibility is the assignment of the IIN.

Questions for NCPDP:

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?
2. Is there a migration period for members to comply?
3. Is it reasonable to assume migration might be accomplished by 2027?

The USA RC would like to thank NCPDP for their continued collaboration and is willing to provide support for any issues NCPDP would like to discuss.

Best regards,

Michelle Deane
USA RC Secretary

Headquarters 1819 L Street, NW, Washington D.C. 20036 • Tel: 202.293.8020 Fax: 202.293.9287

> New York Office 25 West 43rd Street, New York, NY 10036 • Tel: 212.642.4900 Fax: 212.398.0023

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