Modifications to Electronic Transactions and Code Sets

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History of Regulation

- Two NPRMs published May 2002
 - Retraction of NDC code
 - Adoption of Proposed Addenda

Public comments received on both rules

Regulation Dates

- Published February 20, 2003
- Effective March 24, 2003
- Compliance Date:
 - Oct 16, 2003 for small health plans and covered entities that submitted an extension plan
 - Other covered entities can comply by using either original standards or these modifications

Key Provisions of the Final Rule

- No drug coding standard for providers other than retail pharmacies
 - Retail pharmacies must use NDC codes
 - All other providers must code drugs based on the implementation guides
 - IG requires HCPCS, with supplementation by NDC code if Federal or State rules require.

Apparent Conflict?

- This means that the regulation says no standard, but the implementation guides set a standard
- DHHS will work with the DSMOs to resolve this issue

Key Provisions of the Final Rule

- Adopts the "Final" Addenda as part of the standards
 - Reflects first set of changes as agreed to by the DSMOs
 - Supplemented by comments received in the public comment process for the NPRMs

Addenda Changes

- Generally relaxes requirments
 - Some elements changed from required to situational
 - Some elements dropped
 - Some information represented by codes rather than a separate data element

Key Provisions of the Final Rule

- Changes to some standards
 - Adopted NCPDP Batch Version 1.1
 - Had been Version 1.0
 - Adopted the X12N 835 as the standard remittance advice for all providers
 - Had been NCPCP for pharmacies
 - Adopted NCPDP standard for prior authorization for retail pharmacy drug transactions
 - Had been X12N 278