# The WEDI/NCHICA 5010/D.0 Planning and Implementation Timeline

Comparison of Timelines

And

Issues to be Addressed

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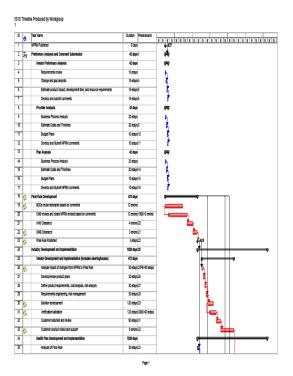
# Development of the WEDI/NCHICA Timeline

- Inventory and Project Plan
- Attempt to create a realistic timeline to avoid contingency plans
- Joint effort of WEDI and NCHICA
- Involved professionals from plans, providers, and vendors
- Vetted through both organizations and public meeting
- Based on "real life" experience from HIPAA and NPI implementations

#### Timeline

- Available at <u>www.nchica.org</u>
- We have a 5010 and NCDPD D.0

1 2	0	Task Name	Duration	Start	Finish Predecessors
	<b>33</b> 3	Publish NRPM	0 days	Fri 8/22/08	Fri 8/22/08
	<b>(b)</b>	NCPDP D.0 Business Planning	106 days	Frl 8/22/08	Mon 1/19/09 1
3		Payers	5 emons	Fri 8/22/08	Mon 1/19/09
		Pharmacles Vendors	5 emons 5 emons	Fri 8/22/08	Mon 1/19/09 Mon 1/19/09
5		PBMs	5 emons	Fri 8/22/08	Mon 1/19/09 Mon 1/19/09
9		Switches	5 emons	Fri 8/22/08	Mon 1/19/09
8		NCPDP D.0 Development	386 days	Mon 1/19/09	Tue 7/13/10 2
å	19	Pavers	18 emons	Mon 1/19/09	Tue 7/13/10
10		Develop and Distribute Payer Sheel	6 emons	Mon 1/19/09	Sat 7/18/09 9SS
11		Pharmacles	6 emons 18 emons		Tue 7/13/10
12		Vendors	18 emons		Tue 7/13/10
13		PBMs	18 emons		Tue 7/13/10
14		Switches		Mon 1/19/09 Mon 1/19/09	Tue 7/13/10
15		Final Rule Development		Tue 10/21/08	Sat 7/18/09 1FS+2 emon
15		SDOs Revise Standards based on (		Tue 10/21/08	Sat 7/18/09 1FS+2 emon Wed 2/18/09
17		CMS revises and clears rule		Tue 10/21/08	Wed 2/18/09
18 19	-	HHS Clearance OMB Clearance	2 emons	Wed 2/18/09 Sun 4/19/09	Sun 4/19/09 17 Sat 7/18/09 18
	L.		3 emons		
20 21	2	Publish Final Rule NCPDP D.0 Formal and Informal Testi	0 days	Sat 7/18/09	Sat 7/18/09 19
22	100	Pavers Pavers	128.94 days 6 emons	Tue 7/13/10 Tue 7/13/10	Sun 1/9/11 8 Sun 1/9/11
22			6 emons	Tue 7/13/10	Sun 1/9/11 Sun 1/9/11
23 24	4	Pharmacles Vendors	6 emons	Tue 7/13/10	Sun 1/9/11 Sun 1/9/11
	4	Vendors PBMs	6 emons	Tue 7/13/10 Tue 7/13/10	Sun 1/9/11 Sun 1/9/11
25 26	4	Switches	6 emons	Tue 7/13/10	Sun 1/9/11
	l.	NCPDP D.0 Transition Period			Fri 7/8/11 2188+1 emo
27			236 days 11 emons	Thu 8/12/10 Thu 8/12/10	Fri 7/8/11 2155+1 emo
28	4	Payers	11 emons 11 emons	Thu 8/12/10	Fri 7/8/11
29	4	Pharmacies			
30	4	Vendors PBMs	11 emons	Thu 8/12/10	Fri 7/8/11 Fri 7/8/11
31	-			Thu 8/12/10	
33	48	Switches NCDPD D.0 Compliance Date	11 emons 0 days	Thu 8/12/10 Frl 7/8/11	Fri 7/8/11 Fri 7/8/11 32



#### 5010 Timeline

- Published at <u>www.nchica.org</u>
- Made several assumptions
  - Two years from NPRM to final rule
  - Industry starts work after final rule published
  - Cooperation among plans, providers, and vendors
  - Transition period to help smooth implementation
- Four years for full implementation

#### D.0 Timeline

- Developed by NCPDP
- Published in a White Paper sent to CMS
- Assumes
  - Work starts on NPRM publication
  - Cooperation among vendors, providers, plans, PBMs
  - Transition Period
- Expected Full Compliance July 2011

### Compare with NPRM assumptions

- Industry starts work in September 2008
- Final compliance date April 2010
- Lessons learned from NPI and HIPAA implementation
- No transition
- In place to allow ICD-10 implementation October 2011

• These are major differences.

## Response to NPRM

- WEDI/NCHICA Timeline Committee looking at ways to accommodate some CMS assumptions and shorten timeline
- Expect to have results by next week, certainly in time for comment to the NPRM.
- Expect some shortening of anticipated timeline, but not to extent that CMS expects.

#### WEDI Actions

- Presenting actions that industry can take now to start work without full 5010 implementation
- Carefully reviewing NPRM for comments thru Policy Advisory Groups
- Starting an ICD-10 Timeline work group
- Presenting audiocasts on the NPRMs and the subject matter of ICD-10 and 5010 implementation.

# What Should Entities Be Doing?

- Review NPRMs for timeline issues.
- You need to get the TR3s to determine business process changes.
- Issues
  - When can you begin? (budget, resources)
  - What works needs to be done not just a translator mapping exercise?
  - What else do you have to do?
  - When will your vendors and partners be ready?
- Do analysis now to make an informed comment.
- Contribute to NPRM comments