

EFIOs and the NPI

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Topics

- What is EFI
- How EFI Works
- Becoming an EFIO
- Preparing & Submitting Files to NPPES
- Processing & Resolving Discrepancies
- NCPDP's EFIO Experience
- Why Become an EFIO?

What is EFI?

- Process by which a provider or provider group can have an organization apply for the NPI on their behalf electronically
- One file can have hundreds –thousands of applications
- ***Presumably*** lowers administrative burden for providers and HHS
- Can also be used for updates to NPPES

How EFI Works

- EFIO Registration
- Information Gathering from Providers
- EFIO Submits XML File to NPPES
- NPPES Review and Feedback with NPIs
- EFIO Fulfills Other Responsibilities

EFIO Registration

- Register via NPPES web site registration page
- Download, complete and sign Certification Statement and mail to Enumerator.
 - <http://www.cms.hhs.gov/cmsforms/downloads/cms10175.pdf>
- Wait for approval before submitting files
- Representatives (EORs) must register

Certification Statement

- Have written legal authority to act as EFIO
- Provider has informed EFIO their information is accurate and complete
- All data submitted no more than 12 months old from date provider certifies accuracy
- Will promptly notify provider of NPI or rejection
- Will only disseminate for purposes permitted under Federal or State law

Certification Statement

- Each provider has informed the EFIO in writing the information submitted is accurate and complete
- Maintain records of all correspondence and communications
- Right to examine books and records

Information Gathering

- Collect all of the relevant data from providers
 - Required and optional fields vary by provider Type 1 or 2
 - By taxonomy
- EFIO responsible for ensuring all required data element on the XML schema are completed and accurate

Preparing and Submitting Files to NPPES

- XML file Technical Companion Guide at <http://www.cms.hhs.gov/NationalProviderStand/Downloads/TechnicalCompanionGuide.pdf> & Read Chapter 8 of User Manual
- Send 1 file of 25 records to test format/submission process

Preparing and Submitting Files to NPPES

- CMS recommends no more than 3 files per week, 1000 records per file to insure EFIO processes of downloading and submitting are working.
- After success with the above, no limitation on number of files, limited 25,000 records per file

Preparing and Submitting Files to NPPES

- Every record in file must be of same type (adds or changes)
- Deactivates are manual until further notice
- Upload to NPPES
- Email acknowledgement of upload and filename

Response Process – Rejected Files

- Files with >15% of records with errors are rejected
 - Field edits
 - Validation errors
 - Duplicate checks
- Records with discrepancy requiring Enumerator review are “pended”
- Threshold can be adjusted based on volume
- Rejected files have no information on which records hit edits

Response Process - Returned Files

- Each pended or rejected record will contain data submitted and status code
 - Pends/rejects at first error. Does not report all errors
- Accepted records will contain data submitted and NPI

Error Resolution

- Enumerator responsible for pended records
 - May contact EFIO and/or provider
- EFIO can act independently to resolve the pended record, but only the Enumerator can “unpend” a record.
- Record can not be resubmitted by EFIO unless Enumerator rejects

Notifying Providers of their NPIs

- “Promptly”
- Format at discretion of EFIO
 - Written letter or email suggested - documentation

Changes of Information

- Can be via the provider or the EFIO, by agreement
- If EFIO, must also notify providers of confirmation of changed records
- Ultimately the responsibility of provider that NPPES is notified of change

Other EFIO Responsibilities

- Maintenance/Security of Files
- Termination of Agency Relationship
- Voluntary Deactivation
- Involuntary Deactivation
- Dissemination of NPIs

NCPDP's EFIO Initiative

Who is NCPDP?

- DSMO for pharmacy sector
 - Maintain NCPDP Telecommunication and SCRIPT standards among others
- 1400 members
 - Providers
 - Payers/Processors
 - Vendors/General Interest
- Enumerator for pharmacy since 1981

Why Become an EFIO?

- Pharmacies know and *trust* NCPDP enumeration.
- Control and standardize (to extent possible) enumeration rules for pharmacies
- Manage the “many to many” or “one to many” possibilities
- Industry reliant on NCPDP Pharmacy Database which is licensed to processors, health plans, clearinghouses, CMS, informatics companies and others.

Value to Pharmacies

- Chains need not apply one pharmacy at a time (provider-friendly batch application formats for chains)
- Minimize industry/payment disruption because crosswalk will exist
- Pharmacy only need to maintain NCPDP Database (NCPDP does the rest)
- No cost. Pharmacy does what has been done for 25 years.

Value to Payers - Database

- Established crosswalk available after bulk enumeration and before testing
- Richer data source
 - Taxonomy, license information, other numbers included in database
 - Chain pharmacies and other affiliations identified needed for processing

Activities to Date

- NCPDP-WEDI White Paper for Pharmacy
 - Timeline for pharmacy
- NCPDP Pharmacy Database Enhancement
 - Completed conversion and in clean up phase
 - New maintenance procedures in effect
 - New Pharmacy Application/Update Form
 - Standard Excel File for Pharmacy Chains
- New Version 2.0 Output File in Production
4/1/06
 - Pre-release Implementation Guide Available

Industry Outreach

- Trade Journals
- NCPDP Member Communications
- Other Associations
- Obtained “pledges” from pharmacy groups to determine interest
 - Intend on using NCPDP
 - Will wait to enumerate

Pharmacy Pledges

- Major chains
- DoD
- Indian Health Service
- Many smaller chains & independents
- Support of other associations
 - NACDS and others

New Taxonomy Codes for Pharmacy

- Level 2
 - Pharmacy (revised)
 - Military Pharmacy (in revision)
 - VA Pharmacy
 - I/U/T Pharmacy
 - Non-Pharmacy Dispensing Site

Level 3 Taxonomy

- Clinic
- Community/Retail
- Home Infusion
- Institutional
- Long Term Care
- Mail Order
- Managed Care
- Nuclear
- Specialty

Current Activities

- Beta Testing EFIO process with CMS
- Obtain Certification from Enumerator
 - Awaiting Certification Statement release on NPPES web site
- Obtain authorization from pharmacies
 - Working on standard chain authorization
 - Authorization on paper NCPDP Application/Update Form
- Receiving and applying updated information from pharmacies

Future Activities

- Enumerate pharmacies
 - “Late spring”
- Resolve rejected records with pharmacy contact person and Enumerator
- Disseminate NPI to chain/group or individual pharmacy
- Expect process to take 5-6 months

EFIO Issues or Concerns

- Certification Statement requires too much of EFIO
- Pending/Rejecting on First Error may require multiple resubmissions
- Granularity of Error Codes
- Will Dissemination Notice impact ability to release data captured in EFIO process?
- Enumeration window is shrinking
 - Industry needs months to distribute, match records, populate with NPI and test

Issues for NCPDP as Former Enumerator

- Industry movement from single NCPDP ID for pharmacies to possibly multiple NPIs due to subpart rule and new business needs
 - How to avoid payment disruption
 - Duplicate logic of processors
 - Fraud
- Reinstatements of previously deactivated numbers?
- Can EFIO submit changes on-line as with deactivations on behalf of provider?
- Resolve rejected records with pharmacy contact person and Enumerator

Value of EFI for Organizations

- Centralizes process
- Eliminates necessity for multiple sign-ins on web (20 minutes per NPI)
- Reduces application errors that occur via manual on-line entry
- Provides audit trail

Value of EFI for Organizations

- Opportunity to automate tracking of NPI assignment
- Opportunity to review and update provider databases
- Facilitates cross walking NPIs to legacy IDs
- Facilitates collaboration with industry partners
 - EFIO disseminates NPI to industry partners

EFIO Value for Organizations

- ROI
 - CMS estimates web-based data entry takes 20 minutes for provider
 - Doesn't take into account time to collect information, subpart decisions, etc.
 - For pharmacy, total is 11.2 person-years, excluding information collection

Unique Pharmacy Issues

- NCPDP v5.1 Telecommunication Standard does not support the “dual identifier” option
- Pharmacy claim transactions are a large percentage of total claim transactions and very visible to patient
- Telecommunication standard a real-time transaction. Need the NPI in real time or disrupt patient care.
 - Pharmacy NPI
 - Prescriber NPI How will pharmacies obtain?

Take Home Messages

- EFIOs can save administrative time for large organizations and for CMS
- EFI process as designed is cumbersome and lacks industry standard practices for file exchange and editing
 - Will require special processes by EFIO
- Be sure your processes are well documented and tested

More Information

- http://www.cms.hhs.gov/NationalProvIdentStand/07_efi.asp#TopOfPage
- http://www.ncpdp.org/frame_news_npi-info.htm
- <http://www.wedi.org/npioi/index.shtml>