NCPDP SCRIPT STANDARD IMPLEMENTATION TIMELINES

VERSION 1.0

This paper offers guidance to the pharmacy industry in preparing for the implementation of versioning changes to the NCPDP SCRIPT Standard.

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The writers of this paper will review and possibly update their recommendations should any significant changes occur.

This document is for Education and Awareness Use Only.
1. PURPOSE

Entities such as pharmacy, prescriber, intermediary, payer/health plan, long-term care and post-acute care facilities, and vendors that support these entities need adequate time to modify business processes, develop and test system and software changes for implementation of the NCPDP SCRIPT Standard Version 2017071.

The NCPDP SNIP Committee developed this timeline as guidance to the industry in preparing for the implementation of versioning changes to the NCPDP SCRIPT Standard.
2. SCOPE

The implementation timelines put forth in this document are based on the Medicare Program: Contract Year 2018 Policy and Technical Changes to the Medicare Advantage, Medicare Cost Plan, Medicare Fee-For-Service, the Medicare Prescription Drug Benefit Programs, and the Pace Program Final Rule 42 CFR Parts 405, 417, 422, 423 and 498 (https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07179.pdf) and recommendations of the SNIP committee. The intent of the timeline is to provide early action and sufficient time for the industry to implement compliant processes in a timely manner.
3. NCPDP SCRIPT STANDARD IMPLEMENTATION GUIDE VERSION 2017071

3.1 Timeline

Each column shown below indicates the items that should occur within a given period. A twenty four-month development period was determined to be needed, in order to facilitate testing and certification and to ensure a high degree of interoperability across trading partners.

<table>
<thead>
<tr>
<th>Project Phase / Milestone</th>
<th># days</th>
<th># Months</th>
<th>Start</th>
<th>End</th>
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<td>11/28/2017</td>
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<td>Business Planning</td>
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<td>12</td>
<td>12/1/2017</td>
<td>11/30/2018</td>
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<td>Final Rule Published</td>
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<td>4/18/2018</td>
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<td>Development</td>
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<td>7/31/2019</td>
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<td>Testing</td>
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<td>11/1/2018</td>
<td>8/31/2019</td>
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<td>Certification</td>
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<td>5</td>
<td>7/1/2019</td>
<td>11/30/2019</td>
</tr>
<tr>
<td>Software Deployment/User Training</td>
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<td>6</td>
<td>7/1/2019</td>
<td>12/31/2019</td>
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<td></td>
<td>12/31/2019</td>
</tr>
<tr>
<td>Applicability Date of v2017071</td>
<td></td>
<td></td>
<td></td>
<td>1/1/2020*</td>
</tr>
<tr>
<td>Total Duration:</td>
<td>25**</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Conditional on The Office of the National Coordinator for Health Information Technology (ONC) adopting the same standard for use in its Electronic Health Record Certification Program by this date.

**Total duration for the implementation of the NCPDP SCRIPT Standard Implementation Guide Version 2017071 is 25 months. The start dates on the above table show overlap but it is recommended entities begin each task by the start date.

3.1.1 Business Planning

The business planning activities include such items as:
- Determine the Scope
- Define the Business Requirements
- Identify Budget Requirements including Resources
- Perform Risk Assessment
- Software Deployment and User Training

3.1.2 Development

Examples of processes that should be completed within this phase are:
- Systems analysis
- Coding
- Testing (may include but not limited to Unit, Integration, Parallel, etc.)
- Infrastructure planning
3.1.3 Testing
During this phase, the applicable entities (i.e., trading partners) participate in testing designed to demonstrate their systems comply with the requirements of the standard(s). Willing trading partners may engage in testing prior to this period, but no trading partner can require another trading partner to begin testing prior to the start of this period. Testing may include, but is not limited to, User Acceptance, End-to-End, and Pre-certification. Issues identified may result in additional development and further testing cycles.

Testing is available using the NCPDP v2017071 test tool. This tool is available for use by all entities to test and assure the correct implementation of NCPDP’s SCRIPT Standard for data transport, content usability and system functionality.

3.1.4 Certification
During this phase, the stakeholder would certify with the relevant entities. For example:
- Trading Partners
- Intermediaries
- DEA audit providers for Electronic Prescription for Controlled Substances (EPCS)
- ONC Authorized Testing Labs (ATLs)

Issues identified may result in additional development, further testing and certification cycles.

3.1.5 Software Deployment/User Training
Deployment of certified software to end users and production systems occurs during this phase and must complete as of the applicability date. User training will also occur at this time.

3.1.6 Applicability Date
The date by which all processes listed above must be completed, as well as the date on which the industry must migrate to the newly mandated version. Note: the applicability date of January 1, 2020 is conditional on ONC adopting the same standard for use in its Electronic Health Record Certification Program by the date indicated on the timeline.

3.2 Recommendations
The NCPDP SNIP Committee developed this timeline as guidance to the industry in preparing for the implementation of versioning changes to the NCPDP SCRIPT Standard. In order to meet the applicability date entities should:
- Review and follow the timeline
- Establish milestones
- Coordinate activities across entities
- Begin testing early in the process
- Reference regulatory requirements that may impact electronic prescribing
- Allow adequate time for certification
4. HHS FINAL RULE AND PREAMBLE

- The final rule allows entities to begin use of the newly mandated version of the standard starting on the applicability date of the final rule January 1, 2020 and is conditional on ONC adopting the same standard for use in its Electronic Health Record Certification Program on the same date.
- Since the NCPDP SCRIPT Standard Implementation Guide V2017071 was deemed by CMS to not be backwards compatible to the NCPDP SCRIPT Standard Implementation Guide V10.6, no transition period is allowed.
- The following messages are required to be sent for Medicare Part D, if performed electronically:
  - GetMessage
  - Status
  - Error
  - NewRxRequest
  - NewRx
  - RxChangeRequest
  - RxChangeResponse
  - RxRenewal Request
  - Resupply
  - RxRenewalResponse
  - Verify
  - CancelRx
  - CancelRxResponse
5. RESOURCES

- 2017071 SCRIPT Standard Implementation Guide and XML schema
- V10.6 to V2017071 Crosswalk
- SCRIPT Implementation Recommendations document – Note: this document has been incorporated by reference in the NCPDP SCRIPT Standard Implementation Guide and is therefore enforceable by law. This document is updated on a quarterly basis (February, May, August and November).
- NCPDP Web-Enabled Data Dictionary
- NCPDP Web-Enabled External Code List
- NCPDP Table Data
6. APPENDIX A. HISTORY OF CHANGES

6.1 VERSION 1.0
The initial release of the document.