FREQUENTLY ASKED QUESTIONS (FAQS) FOR:

1. **E-PRESCRIBING & MEDICATION HISTORY MIGRATION TO NCPDP SCRIPT VERSION 2017071**

2. **SUNSET DATE FOR SURESCRIPTS SOLUTIONS THAT ALIGN TO NCPDP SCRIPT VERSION 10.6**

E-PRESCRIBING & MEDICATION HISTORY MIGRATION TO NCPDP SCRIPT version 2017071

This section provides Network Alliance members with answers to frequently asked questions about the migration of E-Prescribing and Medication History to the new NCPDP SCRIPT version 2017071.

What is the NCPDP SCRIPT Standard v2017071?

The NCPDP SCRIPT Standard is the electronic prescribing (e-prescribing) standard created to facilitate the transfer of prescription data between pharmacies, prescribers, intermediaries, facilities, and payers.

The current version of the standard, NCPDP SCRIPT Standard v10.6, is being replaced by the updated standard version, NCPDP SCRIPT Standard v2017071. This updated standard version was adopted by the Centers for Medicare & Medicaid Services (CMS) on April 16, 2018 (the published Final Rule date) as the official Medicare Part D prescription drug benefit e-prescribing standard.

The updated NCPDP SCRIPT Standard v2017071 has a CMS implementation date of January 1, 2020 while the current NCPDP SCRIPT Standard v10.6 has a CMS sunset date of December 31, 2019.

Visit our Intelligence in Action portal for updates on NCPDP SCRIPT Standard v2017071.

Why is Surescripts adopting the NCPDP SCRIPT Standard v2017071?

Adoption of the NCPDP SCRIPT Standard v2017071 is required to maintain legal and regulatory compliance as well as interoperability across the Healthcare Information Technology (HIT) ecosystem.

The NCPDP SCRIPT Standard v2017071 will modernize e-prescribing and medication history, improve patient safety and prescription accuracy while creating workflow efficiencies for healthcare providers and pharmacies.

The NCPDP SCRIPT Standard v2017071 will also help minimize manual processes that currently require healthcare providers and pharmacies to step outside their workflows to exchange critical patient care information. For example, it will enable pharmacies to electronically request prescriptions for medications they have not previously dispensed and will include more data elements as part of a patient's medication history.

Visit our Intelligence in Action portal for updates on NCPDP SCRIPT Standard v2017071.

Which Surescripts solutions are being updated to align to the NCPDP SCRIPT Standard v2017071?

The following Surescripts solutions are being updated to align to the NCPDP SCRIPT Standard v2017071:

Current Surescripts Solutions Aligning to NCDPD SCRIPT version 10.6	Updated Surescripts Solutions Aligning to NCDPD SCRIPT version 2017071
E-Prescribing 10.6	E-Prescribing 6.1
Medication History 1.0 for Ambulatory	Medication History 3.0 for Ambulatory
Medication History 1.0 and 2.0 for Reconciliation	Medication History 3.0 for Reconciliation
Directories 4.4, 4.5, and 4.6	Directories 6.1

How may I obtain a copy of the CMS Final Rule that names the NCPDP SCRIPT Standard v2017071?

The Centers for Medicare and Medicaid (CMS) Final Rule and the CMS Correction to the Final Rule (edits and revisions in the Final Rule document) may be obtained as a download from the US Federal Register:

Click here for the US Federal Register Final Rule

Click here for the CMS Correction to the Final Rule

How may I obtain a copy of the CMS Final Rule that names the NCPDP SCRIPT Standard v2017071?

The NCPDP SCRIPT Standard v2017071 materials are available to NCPDP members on the NCPDP website's SCRIPT Standards page: Which you can find here

Materials include:

- NCPDP SCRIPT Standard v2017071 XML Files

- NCPDP SCRIPT Standard v2017071 Implementation Guide
- NCPDP SCRIPT Standard v2017071 XML Standard
- V2017071 NCPDP SCRIPT Standard Examples Guide
- NCPDP SCRIPT 2017071 and 10.6 Comparison
- NCPDP SCRIPT v201707 Data Dictionary and External Code List (online tool)
- SCRIPT Implementation Recommendation Guide

Will a DEA Part 1311 audit be required for upgrading to the NCPDP SCRIPT Standard v2017071?

The US Drug Enforcement Administration's (DEA) Part 1311 audit requirements should be evaluated in consultation with your legal counsel and/or a Part 1311 Electronic Prescriptions for Controlled Substances (EPCS) auditor to determine if an audit would be necessary for your products NCPDP SCRIPT Standard v2017071 upgrade.

What is Surescripts E-Prescribing 6.x?

E-Prescribing 6.x is Surescripts updated e-prescribing solution that aligns to the NCPDP SCRIPT Standard v2017071.

What is Surescripts Medication History 3.x?

Medication History for Reconciliation 3.x and Medication History for Ambulatory 3.x are Surescripts updated Medication History solutions that align to the NCPDP SCRIPT Standard v2017071.

Do I need to upgrade to Surescripts Directory 6.1?

Yes. The Provider Location and Organization Directories will be updated in Surescripts Directory 6.1 with enhancements and align to the NCPDP SCRIPT Standard v2017071.

How is Surescripts supporting Network Alliance partners during the transition to NCPDP SCRIPT Standard v2017071?

- Surescripts is supporting the transition to the NCPDP SCRIPT Standard v2017071 through: A dedicated series of email communications providing helpful information regarding insights, tools, timelines, documentation, webinars, etc. to keep you up-to-date and informed
- Sharing lessons learned from an Early Adopter program with a group of Network Alliance partners
- The availability of version translations so you can migrate independently with minimal disruption
- Access early versions of documentation and Guides
- Hosted monthly working sessions, educational workshops and blogs to help you stay informed and collaborate

> on key decisions
- Dual support of the new and old versions of the solutions for a period of time to help you meet your migration plans

In addition, we have built new tools and continue to enhance existing ones to improve your internal and external testing, certification and implementation efforts. Our goal has been to find efficiencies that will reduce implementation timelines and improve your experience. For example, we have:

- Reduced application certification requirements by prioritizing patient safety and regulatory needs and eliminating redundancy
- Developed new test tools that send and receive clinically relevant scenario-based messages to simulate production
- Reduced the amount of testing needed and the provision of tools to increase configurability with greater efficiency

How much work is involved in transitioning to Surescripts E-Prescribing 6.1 and Medication History 3.0 solutions?

We understand that adopting the NCPDP SCRIPT Standard v2017071 will be a considerable effort. The amount of work required will depend on your system and company. It is strongly advised that you evaluate the impact of the changes on your organization to assess the level of effort needed to make the transition.

Surescripts is committed to help you make the transition. Through close collaboration with our Network Alliance partners, we are taking a proactive and unified approach to help make the transition as seamless as possible.

For example, Surescripts will continue to provide information on how the updated and current versions differ. This includes changes to schema, business rules, translations, workflow and tools. Our dedicated series of email communications will keep you informed of timelines, tools, procedures, webinars, education, etc. Your Account Manager is available for any questions that you may have.

What Guides and Translation Matrices are currently available to assist in building/testing Surescripts E-Prescribing 6.1 and Medication History 3.0 solutions?

The following Surescripts documentation is currently available to you in your Admin Console staging environment:
- Connectivity and Authentication Implementation Guide
- Directories Early Adopter Draft Implementation Guide 6.1.1
- E-Prescribing Early Adopter Draft Companion Guide 6.1.2
- E-Prescribing 6.1 Translation Matrix (link in Appendix of E-Prescribing Early Adopter Draft Companion Guide 6.1.2)
- eRx Message Manager Pilot Draft User Guide 1.1
- Medication History Companion Guide 3.0.1
- Medication History 3.0 Translation Matrix (link in Appendix of Medication History Companion Guide 3.0.1)

Surescripts will continue to make modifications to our documentation based on our Early Adopter program. As

Guides are published and made available in the Admin Console staging environment, we will notify you with our NCPDP SCRIPT Standard v2017071 email communication series.

Where can I find XML message examples?

XML message examples can be found in the NCPDP SCRIPT Standard v2017071 Examples Guide (see FAQ#4, "How may I obtain a copy of the NCPDP SCRIPT Standard v2017071 documents?", on how to obtain this guide from NCPDP).

In addition, the e-Prescribing and Medication History Message Manager is pre-populated with a variety of example messages that users can send to their own application.

SUNSET DATE FOR SURESCRIPT SOLUTIONS THAT ALIGN TO NCPDP SCRIPT version 10.6

This section provides Network Alliance participants with answers to frequently asked questions about the December 1, 2020 sunset date for the current Surescripts solutions that align to NCPDP SCRIPT version 10.6.

Why and how was the December 1, 2020 sunset date determined?

The December 1, 2020 sunset date was decided upon with input from across our customer base (Network Alliance) along with thoughtful and careful consideration of the following:

Network Alliance requirements

- Provide the appropriate lead time for Network Alliance participants to migrate to the updated solutions (24 months). Surescripts Early Adopter Guides were published by October 2018.
- Confirm that the majority of Network Alliance participants have begun preparing their migration efforts.
- Assure Surescripts network stability, as well as ensure that remediation support is available during the first year of the updated solutions versions.
- Ensure everyone on the Surescripts network would be able to leverage the additional capabilities introduced as part of the updated solutions alignment to the NCPDP SCRIPT version 2017071.

Regulatory landscape

- The Centers for Medicare and Medicaid Services ("CMS") adoption of the NCPDP SCRIPT version 2017071 for Medicare Part D E-Prescribing programs effective as of the January 1, 2020 implementation date, and the retirement of NCPDP SCRIPT version 10.6 for E-Prescribing and Medication History transactions.
- The Office of the National Coordinator ("ONC") Health IT Certification Program and its criteria for certification of EHR vendor's software for ambulatory and acute providers.
- CMS's administration of the Promoting Interoperability ("PI ") Program requiring compliance to the Certified EHR Technology (CEHRT) criteria set by ONC.

What will happen on the December 1, 2020 sunset date?

At 12:00AM Eastern Standard Time on December 1, 2020 Surescripts current solutions and transaction versions that align to the NCPDP SCRIPT version 10.6 will be retired and no longer function or be supported.

The following table provides the names of the old solutions and their corresponding updated solutions:

Current Surescripts Solutions Retiring at 12:00AM EST on Sunset Date of December 1, 2020	**Updated Surescripts Solutions** Aligning to NCDPD SCRIPT Standard v2017071
E-Prescribing 10.6	E-Prescribing 6.1
Medication History 1.0 for Ambulatory	Medication History 3.0 for Ambulatory
Medication History 1.0 and 2.0 for Reconciliation	Medication History 3.0 for Reconciliation
Directories 4.4, 4.5, and 4.6	Directories 6.1

Transactions using the current solutions after the sunset date will be rejected by Surescripts. The sunset date applies to all Network Alliance participants.

There are multiple Surescripts solutions that implement NCPDP SCRIPT version 10.6. Does the sunset date impact any of the solutions not listed in the above chart?

No. The only Surescripts solutions retiring on the sunset date are listed in the answer to question above.

What will happen when messages are sent between the current and updated solutions prior to the sunset date?

Messages occurring between current and updated versions will be automatically translated when appropriate and safe to do so. If it is not appropriate to translate the message due to the content of the message being lost in translation, the message will be rejected with a notice specifying the rejection reason. Translation Matrices have been developed and are available in your Admin Console staging environment:

- E-Prescribing 6.1 Translation Matrix (link in Appendix of E-Prescribing Companion Guide 6.1).
- Medication History 3.0 Translation Matrix (link in Appendix of Medication History Companion Guide 3.0).

Please note that it is the responsibility of Network Alliance participants to determine whether conducting transactions using NCPDP SCRIPT version 10.6 following the January 1, 2020 CMS compliance deadline is acceptable based on their individual circumstances. According to guidance issued by CMS on May 9, 2018, CMS expects Part D plans to allow pharmacies to address any implementation issues with the transition to NCPDP SCRIPT version 2017071 without imposing financial penalties.

Can I migrate to the updated solutions before the January 1, 2020 CMS compliance date?

- Yes, you are able to migrate to Surescripts' updated solutions prior to January 1, 2020.
- Our interpretation of the CMS guidance announced on May 9, 2018 and September 20, 2019 is that industry has significant flexibility as to how they may test NCPDP SCRIPT version 2017071 prior to January 1, 2020, including allowing for testing in a production environment.
- Surescripts has invested in technology solutions and business processes to lead the industry in a transition to the NCPDP SCRIPT version 2017071 in a manner that preserves network stability and patient safety; this includes product certification and testing in the production environment prior to January 1, 2020.
- Through a proactive and unified approach, Surescripts is committed to helping you make the transition as seamless as possible. Surescripts is prepared and ready to support your preferred migration approach. Your dedicated Surescripts Integration Project Manager can facilitate a discussion to help with your migration plans.
- As of October 2019, several Network Alliance participants have successfully migrated to upgraded solutions, and are actively engaging in transactions in the production environment.

An EHR is deemed certified under the ONC Certification Program, which currently specifies the conducting of e-prescribing transactions using NCPDP SCRIPT version 10.6. Will that specific requirement be updated to reflect the new NCPDP SCRIPT version 2017071?

- On March 4, 2019, ONC published a Notice of Proposed Rule Making ("NPRM") that has issued new certification requirements under the Certification Program.
- The NPRM adopts NCPDP SCRIPT version 2017071 as the new e-prescribing standard under the Certification Program.
- On September 6, 2019, ONC announced that developers of 2015 Edition certified Health IT Modules to the ePrescribing criterion (45 CFR 170.315(b)(3)) are permitted to update their products to NCPDP SCRIPT version 2017071.
- ONC further states that updating to the new standard, "will not invalidate or place at risk the product(s) certification to 170.315(b)(3)".
- Developers are required to inform their ONC-ACBs when they implement NCPDP SCRIPT version 2017071.

What steps is Surescripts taking on behalf of the Network Alliance's EHR community to address the issue with the need to conduct duplicate certifications of NCPDP SCRIPT version 2017071 (once to obtain Surescripts certification and possibly again to obtain ONC

certification)?

- We acknowledge that the lack of harmonization between the Medicare Part D E-Prescribing Program requirements and the ONC Certification Program requirements has created a challenge for the EHR community. We are encouraging EHRs to certify to our implementation of NCPDP SCRIPT version 2017071 as soon as possible in order to be prepared for the January 1, 2020 mandate under the Part D Program. Unfortunately, those same EHRs will not be able to engage with ONC-ATLs and ONC-ACBs to certify to NCPDP SCRIPT version 2017071 under the EHR Certification Program until after the final new certification rule is issued and effective, which is not likely to occur until after January 1, 2020.
- ONC previously approved the Surescripts §170.315(b)(3) electronic prescribing test method as an alternative for meeting the testing requirements of the ONC Health IT Certification Program for NCPDP SCRIPT version 10.6. We are encouraged by this designation, and continue to work with ONC to secure approval to use our test method as a testing alternative for NCPDP SCRIPT version 2017071 as well.
- While not guaranteed, we have a high degree of confidence that we will be awarded ONC-ATL status.
- Surescripts' goal is to certify and approve most, if not all, EHRs for access to the Surescripts network before January 1, 2020, and certainly by the time of our December 1, 2020 sunset date.
- To prevent our customers from having to additionally certify with an ONC-ATL after January 1, 2020, Surescripts has asked ONC to grant us retroactive status as an ONC-ATL so that the certifications that we grant prior to the issuance of the new certification rule would apply for purposes of the EHR Certification Program once the final rule is issued. We cannot provide any assurance that ONC will grant us retroactive status.

What Surescripts resources are available for my migration to the updated solutions?

Surescripts is supporting the transition to the NCPDP SCRIPT version 2017071 through:

- A dedicated, informational email series that provides relevant information regarding early-adopter insights, tools, timelines and documentation. There are also monthly webinars to keep you up-to-date and informed.
    - If you are not consistently receiving these communications or would like to add someone to receive this series, please contact your Surescripts Account Manager.
- Availability of version translations so you can migrate independently with minimal disruption.
- Notification of version numbering nomenclature changes.

In addition, we are building new tools and enhancing existing ones to improve your internal and external testing, certification and implementation efforts. Our goal is to find efficiencies that will reduce implementation timelines and improve your experience. For example, we have:

- Reduced application certification requirements by prioritizing patient safety and regulatory needs and eliminating redundancy.
- Developed new test tools that send and receive clinically relevant scenario-based messages to simulate production.
- Reduced the amount of testing needed and the provision of tools to increase configurability with greater efficiency.