



Operating Rules Entity(ies)

July 20, 2010

NCPDP formally requests to be named as an operating rules entity, fulfilling the criteria established in HR 3590.

(2) OPERATING RULES DEVELOPMENT.—In adopting operating rules under this subsection, the Secretary shall consider recommendations for operating rules developed by a qualified nonprofit entity that meets the following requirements:	NCPDP is a not-for-profit 501c3.
(A) The entity focuses its mission on administrative simplification.	NCPDP standards have developed based on business requirements for over 30 years.
(B) The entity demonstrates a multi-stakeholder and consensus-based process for development of operating rules, including representation by or participation from health plans, health care providers, vendors, relevant Federal agencies, and other standard development organizations.	NCPDP is an ANSI-accredited standards development organization representing balance of pharmacies, facilities, vendors, payers, processors, clearinghouses, etc. NCPDP has shown collaboration with other organizations.
(C) The entity has a public set of guiding principles that ensure the operating rules and process are open and transparent, and supports nondiscrimination and conflict of interest policies that demonstrate a commitment to open, fair, and nondiscriminatory practices.	NCPDP is a standards development organization that follows the requirements of ANSI which promotes openness, consensus, balance, etc NCPDP participates in the DSMO.
(D) The entity builds on the transaction standards issued under Health Insurance Portability and Accountability Act of 1996.	NCPDP standards have been named in HIPAA and MMA.
(E) The entity allows for public review and updates of the operating rules.	NCPDP is publishing industry operating rules based on collaboration with CORE. In addition, all standards and implementation guides are available for public review and comment.

The NCPDP Bylaws and Standing Operating Procedures support this functionality. An NCPDP work group supports task groups, which are open to any interested party, whether NCPDP member or not. A project team will be created to add any new functionality to the NCPDP environment.

Collaboration is very important. If multiple organizations are named as operating rules entities, NCPDP fully intends to collaborate with these organizations. NCPDP recognizes the need for consistency of process, artifact publication, and coordination of recommendations for new operating rules and versions to be named in regulation.

This recommendation is supported with the commitment of NCPDP leadership.