



## New NCPDP Pharmacy Profile Credentialing Enhancement Frequently Asked Questions

Question	Answer
Where do I access my NCPDP Online Pharmacy Profile ?	<a href="https://accessonline.ncdpd.org">https://accessonline.ncdpd.org</a>
What is credentialing?	<p>Healthcare organizations such as PBMs and health plans evaluate pharmacies with which they contract to confirm that they are adequately trained, certified and/or licensed and to confirm services they are able to provide.</p> <p>The credentialing process provides the means for determining and validating a pharmacy's credentials, ensuring that they are in good standing with applicable State and Federal laws, and meet quality performance standards.</p> <p>Your NCPDP Pharmacy Profile provides PBMs and payers with the information and documentation to begin their validation and verification portion of the credentialing process.</p>
When will I be able to start entering my credentialing information?	February 12, 2017
How long will it take me to complete my entire profile?	The entire Pharmacy Profile will take approximately 90 minutes to review and complete. This assumes that all required documentation is available for uploading. A <b>NCPDP Online Pharmacy Profile Required Documentation Checklist</b> is provided with this FAQ.
What if I start my updates, but do not have all the required information available?	The system will allow you to save what you have entered and complete it at a later time. All data you have input will be saved. However, your profile cannot be credentialed until all required fields and documents are accurate and up-to-date and you must affirm and attest the Credential Date field on the Profile.



Question	Answer
<b>What information is included in the updated NCPDP Pharmacy Profile?</b>	<p>Beginning February 12, 2017, your NCPDP online Pharmacy Profile will include two (2) parts.</p> <p><b>Part 1</b> is the part that you currently maintain and includes basic information such as name, address, contact information, pharmacy FEIN, state board of pharmacy license and DEA license.</p> <p><b>Part 2</b> contains CMS 42 CFR 455 regulatory information as well as many of the credentialing items requested by the PBMs such as ownership details, insurance, sanctions and disciplinary information, immunizations offered, compounding and other licensing, certification and accreditations information and documentation.</p>
<b>Why is NCPDP implementing these changes?</b>	<p>Pharmacies are familiar with entering their information via the NCPDP Online website. These NCPDP self-reported pharmacy profiles provide a strong foundation to expand and capture a standard set of credentialing data and 42 CFR 455 Subpart B Disclosure of Information by Providers and Fiscal Agents requirements. The industry believes the NCPDP Pharmacy Profile is the most logical place for the information to reside due to NCPDP's continued support and respect within the pharmacy industry.</p> <p>NCPDP's consensus building forum provides a proven framework for bringing all stakeholders together to standardize pharmacy credentialing requirements. Expanding the NCPDP online Pharmacy Profiles to capture this information would provide the industry with a single Source of Truth for Pharmacy Network Credentialing.</p>



Question	Answer
What new information am I being asked to provide?	<ul style="list-style-type: none"> <li>• Additional Pharmacy Detail Information</li> </ul> <p>Miscellaneous information about the pharmacy including but not limited to contact information, vendor specifics and other questions regarding pharmacy operations</p>
	<ul style="list-style-type: none"> <li>• Ownership and Control Information</li> </ul> <p>Information specific to the ownership structure of the pharmacy</p>
	<ul style="list-style-type: none"> <li>• Owner and Control Entities Information</li> </ul> <p>Information on the listed owners which may include company / entity or individual owners PII details</p>
	<ul style="list-style-type: none"> <li>• Owner Pharmacist License Information</li> </ul> <p>Owner PIC information including name and license specifics</p>
	<ul style="list-style-type: none"> <li>• Company Officers/Directors/ Owners Information</li> </ul> <p>Ownership information for company officers, directors and owners including address and other PII details</p>
	<ul style="list-style-type: none"> <li>• Ownership Relationship Details Information</li> </ul> <p>Related owner information and how the owners are related to each other</p>
	<ul style="list-style-type: none"> <li>• Other Pharmacies Owned Information</li> </ul> <p>Information of other pharmacies owned by the owners</p>
	<ul style="list-style-type: none"> <li>• Insurance Information</li> </ul> <p>General/Professional liability insurance details</p>
	<ul style="list-style-type: none"> <li>• Pharmacist In Charge (PIC) Information</li> <li>•</li> </ul> <p>Includes owners who are PICs.</p>



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	<ul style="list-style-type: none"> <li>• Additional Pharmacy Licensing Information</li> </ul> <p>Additional licenses the Pharmacy carries. Includes the list of different license types along with specific information</p>
	<ul style="list-style-type: none"> <li>• Additional Pharmacy Accreditations Information</li> </ul> <p>Additional accreditations the Pharmacy carries.</p>
	<ul style="list-style-type: none"> <li>• Practice Setting Information</li> </ul> <p>Includes taxonomy codes and percentage of business by taxonomy code</p>
	<ul style="list-style-type: none"> <li>• Sanctions, Exclusions, Disciplinary Actions Information</li> </ul> <p>Information related to questions asked of the pharmacy regarding Sanctions. Exclusions and Disciplinary actions.</p>
	<ul style="list-style-type: none"> <li>• Immunizations Services Information</li> </ul> <p>Information related to pharmacy immunizations certification and immunizations offered by the pharmacy.</p>
	<ul style="list-style-type: none"> <li>• Clinical Services Information</li> </ul> <p>Information related to clinical services offered at the pharmacy</p>
	<ul style="list-style-type: none"> <li>• Compounding Information</li> </ul> <p>Information related to compounding services offered at the pharmacy</p>
<p><b>How will having all of these additional fields of information help me?</b></p>	<p>Your NCPDP Pharmacy Profile simplifies the process of credentialing by enabling you to submit your information into a single source to satisfy the credentialing requirement associated with PBMs, PSAOs and other payers. This single-source repository will help you maintain compliance with federal and state regulations and payers while reducing the duplicative, time-consuming, paper-intensive task of submitting the same information to many contracted payers.</p>



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<b>Do I have to answer every question in my NCPDP Pharmacy Profile?</b>	<p>Yes. All pharmacies must complete all required fields and affirm their full Online NCPDP Pharmacy Profile by December 31, 2017 to ensure their NCPDP Number remains active and current.</p> <p>Updates made to Part 1 of your NCPDP online Pharmacy Profile's will continue to be processed, while Part 2's new additional fields of information are pending completion and affirmation.</p>
<b>I am not a Medicare Part D participating pharmacy. Do I still need to fill out the credentialing fields?</b>	<p>Yes. Your Online NCPDP Pharmacy Profile is part of the trusted source and industry standard for collecting pharmacy data used for claims processing, credentialing and adjudication.</p>
<b>I have given all this information to my PSAO. Can they update my NCPDP Pharmacy Profile online?</b>	<p>Ultimately, it is the pharmacy's responsibility to complete its credentialing data on its NCPDP online Pharmacy Profile. Your PSAO can help, but do not rely on them to complete the profile on your behalf. Your PSAO may not have the information on hand to answer every required question in your profile.</p> <p>Your pharmacy will still need to review all the information in your NCPDP online Pharmacy Profile, complete any missing requirements, and acknowledge that all the information is accurate to the best of your knowledge.</p>
<b>How will confidentiality be maintained with the database?</b>	<p>The confidentiality and security of pharmacy information and the privacy of system users are critical priorities for NCPDP. Our system is designed to be compliant with all laws, rules and regulations relating to the privacy of individually identifiable health information. In addition, NCPDP will comply with applicable laws and regulation pertaining to confidentiality and security in the development of the database and the data collection process.</p>
<b>How do PBMs and payers gain access to my credentialing and compliance information?</b>	<p>The PBM/payer must purchase a subscription license from NCPDP to access your Pharmacy Profile information.</p>



Question	Answer
Why are all of these documents being required to submit?	Based on feedback provided by PBMs, PSAOs, independent pharmacies, pharmacy chains and payers, these are the standard documents required by these organizations for credentialing and regulatory compliance in order to participate in their network as a pharmacy provider.
Will CMS be receiving this information directly from NCPDP?	At this time NCPDP cannot say whether CMS will receive and use a file from NCPDP with the expanded Pharmacy Profile information. However, CMS and other federal agencies do currently receive and use Part 1 Pharmacy Profile data. NCPDP has been in discussion with CMS and they are supportive of our effort and wanted to make sure that the States are aware this information will be available in a single source from NCPDP.
What if I do not offer compounding? How can I complete this information?	You are not required to provide documentation or detailed information for any services or materials that your pharmacy does not provide, such as compounding.
Do Non-Pharmacy Dispensing Sites/physician offices need to complete the expanded profile?	No. At this time, the expanded profile requirements do not apply to NPDS and physician offices.
What CMS regulations/definitions are the Ownership questions in the profile based upon?	<p>We base our Ownership questions on the following CMS regulations.</p> <p><b><u><a href="#">§455.101 Definitions.</a></u></b></p> <p><b><i>Ownership interest</i></b> means the possession of equity in the capital, the stock, or the profits of the disclosing entity.</p> <p><b><i>Person with an ownership or control interest</i></b> means a person or corporation that—</p> <ul style="list-style-type: none"> <li>(a) Has an ownership interest totaling 5 percent or more in a disclosing entity;</li> <li>(b) Has an indirect ownership interest equal to 5 percent or more in a disclosing entity;</li> <li>(c) Has a combination of direct and indirect ownership interests equal to 5 percent or more in a disclosing entity;</li> <li>(d) Owns an interest of 5 percent or more in any mortgage, deed of trust, note, or other obligation secured by the disclosing entity if</li> </ul>

Question	Answer
	<p>that interest equals at least 5 percent of the value of the property or assets of the disclosing entity;</p> <p>(e) Is an officer or director of a disclosing entity that is organized as a corporation; or</p> <p>(f) Is a partner in a disclosing entity that is organized as a partnership?</p> <p><b><i>Indirect ownership interest</i></b> means an ownership interest in an entity that has an ownership interest in the disclosing entity. This term includes an ownership interest in any entity that has an indirect ownership interest in the disclosing entity.</p> <p><b><u><a href="#">§455.102 Determination of ownership or control percentages.</a></u></b></p> <p>(a) <i>Indirect ownership interest.</i> The amount of indirect ownership interest is determined by multiplying the percentages of ownership in each entity. For example, if A owns 10 percent of the stock in a corporation which owns 80 percent of the stock of the disclosing entity, A's interest equates to an 8 percent indirect ownership interest in the disclosing entity and must be reported. Conversely, if B owns 80 percent of the stock of a corporation which owns 5 percent of the stock of the disclosing entity, B's interest equates to a 4 percent indirect ownership interest in the disclosing entity and need not be reported.</p> <p>(b) <i>Person with an ownership or control interest.</i> In order to determine percentage of ownership, mortgage, deed of trust, note, or other obligation, the percentage of interest owned in the obligation is multiplied by the percentage of the disclosing entity's assets used to secure the obligation. For example, if A owns 10 percent of a note secured by 60 percent of the provider's assets, A's interest in the provider's assets equates to 6 percent and must be reported. Conversely, if B owns</p>

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	<p>40 percent of a note secured by 10 percent of the provider's assets, B's interest in the provider's assets equates to 4 percent and need not be reported.</p> <p>Summarized:</p> <p><i>Ownership interest</i> means the possession of equity in the capital, the stock, or the profits of the disclosing entity.</p> <p><i>Person with an ownership or control interest</i> means a person or corporation that—</p> <ul style="list-style-type: none"> <li>(a) Has an ownership interest totaling 5 percent or more in a disclosing entity;</li> <li>(b) Has an indirect ownership interest equal to 5 percent or more in a disclosing entity;</li> <li>(c) Has a combination of direct and indirect ownership interests equal to 5 percent or more in a disclosing entity;</li> <li>(d) Owns an interest of 5 percent or more in any mortgage, deed of trust, note, or other obligation secured by the disclosing entity if that interest equals at least 5 percent of the value of the property or assets of the disclosing entity;</li> <li>(e) Is an officer or director of a disclosing entity that is organized as a corporation; or</li> <li>(f) Is a partner in a disclosing entity that is organized as a partnership?</li> </ul> <p><i>Indirect ownership interest</i> means an ownership interest in an entity that has an ownership interest in the disclosing entity. This term includes an ownership interest in any entity that has an indirect ownership interest in the disclosing entity.</p>





## NCPDP Pharmacy Profile Data Security Frequently Asked Questions

Question	Answer
<b>What is NCPDP's Information Security Policy?</b>	<p>NCPDP's databases have long been used to support provider credentialing and screening and the inclusion of these additional data elements will continue to streamline the process for pharmacies, State Medicaid Agencies, as well as PBMs (and other third parties) that have been delegated this task on behalf of a State Medicaid Agency. NCPDP recognizes and appreciates the sensitive nature of this information and has taken significant steps and implemented information security policies, standards, guidelines, processes, procedures, and best practices to strengthen and ensure the security of the information as well as its availability only to parties with a proper need for such information.</p> <p>NCPDP's managed hosting provider is Creative Information Technology Inc. (CITI) an ISO 20000 and ISO 27001 organization. Our Information Security Policy leverages CITI's ISO 27001 and ISO 20000 certifications enabling us to comply with industry security standards and regulatory requirements. These ISO certifications are maintained by accepting exhaustive on-site audits performed twice a year. This provides NCPDP with the confidence that all security policies are followed and met on an ongoing basis.</p> <p>NCPDP sites and products (dataQ, resQ, HCIdea and AccessOnline) are hosted within Equinix' secure hosting facility. Equinix' hosting facilities are utilized by the Department of Defense and other organizations for which security is paramount. This is an additional level of scrutiny and stringent certifications requirements that CITI has to satisfy to host within Equinix' facility. The facility itself meets various federal and international security certifications. This further validates that the security considerations we have made for your data is absolutely the best.</p> <p>Additionally, security is an integral part of NCPDP's organizational corporate governance beyond just the websites and data. NCPDP provides PII security training to its employees, and has HR policies in place for granting and terminating access to devices at the office and the website.</p>
<b>What is Personally Identifiable Information (PII)?</b>	<p>Personally identifiable information (PII) is any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used for de-anonymizing anonymous data can be considered PII. Personally identifiable information (PII) can be sensitive or non-sensitive.</p>



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	<p><b>Non-sensitive PII</b> - information that can be transmitted in an unencrypted form without resulting in harm to the individual. Non-sensitive PII can be easily gathered from public records, phone books, corporate directories and websites.</p> <p><b>Sensitive PII</b> - <u>MUST</u> be encrypted and protected. This data must be encrypted in transit and also at rest (rest - meaning in the database or a file).</p> <p><a href="http://searchfinancialsecurity.techtarget.com/definition/personally-identifiable-information">http://searchfinancialsecurity.techtarget.com/definition/personally-identifiable-information</a></p>
<p><b>What sensitive PII is collected by NCPDP?</b></p>	<p>DOB and SSN</p> <p>Note: Some other data fields such as PIC license number can also be deemed PII but these are publicly available and hence non sensitive. Since they are not sensitive – these are not encrypted.</p>
<p><b>Who has access to pharmacy credentialing information and sensitive PII and what security is in place?</b></p>	<p>Only NCPDP resQ™ Pharmacy Credentialing Resource subscribers who meet all of the following criteria:</p> <ol style="list-style-type: none"> <li>1) Maintain at least one (1) active NCPDP membership; <b><u>AND ARE</u></b></li> <li>2) Either a Pharmacy Benefit Manager (PBM) or prescription drug plan payer <b><u>AND ARE</u></b></li> <li>3) An authorized Medicaid/Medicare provider who is subject to CMS 455 Disclosure requirements</li> </ol> <ul style="list-style-type: none"> <li>– Subscribing organizations contractually agree to assume complete liability of securing SSN / DOB data upon receipt of the encrypted data.</li> <li>– The entire dataset is encrypted with a unique public key provided by the Subscriber and can only be decrypted by that same Subscriber.</li> <li>– Data is encrypted in transit (as part of the subscribing organizations public key plus file delivery utilizes SFTP protocol).</li> </ul>



Question	Answer
Is the information and documentation I update online secure?	<p>Yes.</p> <ul style="list-style-type: none"><li>- The entire application that you use to update your profile information is accessible only via a secure login. There are no provisions to access any data or documents through the system's back end or any other process.</li><li>- There is no copying of data on any devices connecting to and accessing the website – eliminating endpoint vulnerabilities</li><li>- The data is encrypted and there is no direct URL access to any of the documents.</li><li>- SSN / DOB information is visible ONLY to the person entering this information at the time of entry. Upon submission it is immediately encrypted. Once encrypted it is not visible on the website to anyone, including the person who entered it.</li><li>- All data access is monitored with appropriate flags for excessive download by any individual. Your Pharmacy Profile is only accessible to vetted individuals within the pharmacy.</li><li>- SSN and DOB data is NOT visible on web portal to NCPDP staff, PSAO's, and Pharmacies.</li><li>- The <a href="https://accessonline.ncdpd.org">https://accessonline.ncdpd.org</a> site and ALL data including SSN / DOB are encrypted in transit (from the browser to the server) utilizing SSL certificates and HTTPS transfer.</li></ul>



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Is my information and documentation I provide secure?	<p>Yes.</p> <p>Application Security: The entire application that you use to update your profile information is accessible only via a secure login. There are no provisions to access any data or documents through the system's back end or any other process. The data is encrypted and there is no direct URL access to any of the documents. All data access is monitored with appropriate flags for excessive download by any individual. Your Pharmacy Profile is only accessible to vetted individuals within the pharmacy.</p> <p>Site Security: The <a href="https://accessonline.ncpdp.org">https://accessonline.ncpdp.org</a> site is protected with SSL certificates and all traffic from the browser to the servers is fully encrypted. The servers themselves are protected by several levels of firewalls, intrusion detection system and smart switches.</p> <p>Hardware/Server Security: NCPDP's servers are hosted in a secure set of privately owned servers in a robust and secure hosting facility across two geographic regions. They are not hosted on the generic public cloud. We share this hosting facility with customers like the Department of Defense and the State Department who have stringent requirements similar to what we do regarding our data and documents.</p>
What terms and conditions are part of a resQ™ contract with subscribing organizations regarding Data Security?	<p>Subscribing organizations take complete liability of SSN/DOB data upon receiving this data. The following terms and conditions are part of the required Contract for a resQ subscribing organization.</p> <ol style="list-style-type: none"><li>1) <u>Personally Identifiable Information</u>. The following provisions apply when Licensee has access to personal identifiers, including, but not limited to name, address, phone number, date of birth, Social Security number, other nonpublic personal information, financial account numbers, access codes, driver's license numbers, and state- or federal-identification numbers such as passport, visa or state identity card numbers ("PII").</li><li>2) <u>Data Security</u>. If Licensee stores PII received as part of this Agreement, Licensee warrants</li></ol>

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	<p>that the information will be stored and processed in accordance with applicable law and commercial best practices, including appropriate administrative, physical and technical safeguards to secure such information from unauthorized access, disclosure, alteration and use. Such measures will be no less protective than those used to secure Licensee's own data of a similar type, and in no event less than reasonable in view of the type and nature of the data involved. Licensee will not use or store the Database(s) or any information obtained from via the Database(s) outside the United States without prior written consent from NCPDP.</p> <p>3) <u>PII Requirements</u>. Licensee hereby warrants and covenants to NCPDP that Licensee: a) is a Pharmacy Benefit Manager (PBM) or prescription drug plan payer, and b) is a CMS authorized Medicaid and/or Medicare provider subject to CMS 455 Disclosure regulations. Licensee acknowledges that these requirements must be maintained in order to receive PII information. Licensee must notify NCPDP of any changes in any of the above requirements immediately.</p> <p>4) <u>File Delivery and Acceptance</u>. Licensee must provide to NCPDP via the SFTP site, their public-key encryption. Within ten (10) business days after Licensee has confirmed NCPDP's receipt of the public-key, NCPDP will provide the Database via the SFTP site. Licensee understands that it is responsible for download of the current Database files prior to the next delivery of Database files. NCPDP does not maintain nor can NCPDP provide archive files.</p> <p>5) <u>Indemnity</u>. Licensee shall indemnify and hold harmless NCPDP and its trustees, officers, employees, agents, and subcontractors from and against all claims, costs, losses, or damages (including attorneys' fee) arising from any breach of this section, and for Licensee's violation of any other applicable laws and regulations related to such information.</p>



## NCPDP Online Pharmacy Profile Required Documentation Checklist Effective February 12, 2017

### Part 1 Required Documentation

- ☐ Federal Tax ID (EIN) letter sent by the IRS
- ☐ NPI confirmation email from the NPI enumerator or screen shot from NPPES website.
- ☐ Signed Authorized Official Signature form
- ☐ Current State Board of Pharmacy license(s) for Pharmacy
- ☐ Current Pharmacy DEA license

### Part 2 Required Documentation

- ☐ Federal Tax ID (EIN) letter sent by the IRS for **any company that owns (in whole or in part) your pharmacy**
- ☐ General & Professional Liability Insurance document
- ☐ Pharmacy State Board License(s) for Pharmacist-in-Charge (PIC)

### The following documents are required if applicable to your pharmacy:

- ☐ Inspection Report if pharmacy has any disciplinary action recorded by State Board of Pharmacy in past 10 years
- ☐ Recent site visit by the State Board of Pharmacy
- ☐ Supporting documentation to contest a mistaken sanction
- ☐ Federal Anti-Kickback Statute Compliance Policy & Procedures document
- ☐ Pharmacy Accreditation document(s)
- ☐ Immunization certification(s) if pharmacy provides vaccinations and/or immunizations
- ☐ Pharmacist-in-Charge (PIC) NPI confirmation letter
- ☐ Pharmacist-in-Charge (PIC) Controlled Substance License(s)

### If your pharmacy does sterile compounding or complex non-sterile compounding, the following documentation is required:

- ☐ Compounding Accreditation certificate
- ☐ Compounding marketing material
- ☐ Sales force listing of contractors (IRS 1099 form) or employees
- ☐ Pre-printed prescriptions (if applicable)
- ☐ Policy and procedures for checking for allergies (if applicable)
- ☐ Policy and procedures for providing samples or medications to physicians/prescriber offices (if applicable)
- ☐ Policy and procedures for USP 795 compliance (if applicable)
- ☐ Policy and procedures for USP 797 compliance (if applicable)
- ☐ Standard Operating Procedures (SOP) for compounding a gel cream or ointment (if applicable)
- ☐ Policy and procedures for dispensing or selling compounds to other parties (if applicable)
- ☐ Policy and procedures for accessing MSDS sheets (if applicable)
- ☐ Policy and procedures for submitting Usual and Customary (U&C) price (if applicable)
- ☐ Policy and procedures for anticipatory compounding (if applicable)