This document 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 Standard v10.6.

1. 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 Standard v2017071.

**Regulatory landscape**

- The Centers for Medicare and Medicaid Services (“CMS”) adoption of the NCPDP SCRIPT Standard v2017071 effective as of the January 1, 2020 implementation date, and the retirement of NCPDP SCRIPT Standard v10.6 for E-Prescribing and Medication History.
- CMS’s administration of the Medicare Part D Program relative to the adoption of required e-prescribing standards.
- The Office of the National Coordinator (“ONC”) Health IT Certification Program and its criteria for certification of EHR vendors software for ambulatory and acute providers.
- CMS’s administration of the Promoting Interoperability (“PI”) Program requiring compliance to the Certified EHR Technology (CEHRT) criteria.
2. What will happen on the December 1, 2020 sunset date?

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

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

<table>
<thead>
<tr>
<th>Current Solutions Retiring at 12:00AM EST on Sunset Date of December 1, 2020</th>
<th>Updated Solutions Aligning To NCPDP SCRIPT Standard v2017071</th>
</tr>
</thead>
<tbody>
<tr>
<td>E-Prescribing 10.6</td>
<td>E-Prescribing 6.0</td>
</tr>
<tr>
<td>Medication History 1.0 for Ambulatory</td>
<td>Medication History 3.0 for Ambulatory</td>
</tr>
<tr>
<td>Medication History 1.0 and 2.0 for Reconciliation</td>
<td>Medication History 3.0 for Reconciliation</td>
</tr>
<tr>
<td>Directories 4.4, 4.5 and 4.6</td>
<td>Directories 6.0</td>
</tr>
</tbody>
</table>

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

If the implementation date for the Centers for Medicare and Medicaid Services (“CMS”) adoption of the NCPDP SCRIPT Standard v2017071 changes from January 1, 2020, Surescripts will move the sunset date accordingly.

3. There are multiple Surescripts solutions that align to the NCPDP SCRIPT Standard v10.6. Does this 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 #2 (above).

4. 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 safe, 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 6.0 Translation Matrix (link in Appendix of E-Prescribing Early Adopter Draft Companion Guide 6.0.1).
- Medication History 3.0 Translation Matrix (link in Appendix of Medication History Early Adopter Draft Companion Guide 3.0).
5. 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 is that industry has material flexibility as to how NCPDP SCRIPT Standard v2017071 is tested prior to January 1, 2020, including allowing for testing in a production environment.
- Customers who migrate to the new SCRIPT Standard v2017071 prior to January 1, 2020 will actually be testing in the production environment. This is supported via the May 9, 2018 guidance from CMS.
- Surescripts has invested in technology solutions and business processes to lead the industry in a transition to the NCPDP SCRIPT Standard v2017071 in a manner that preserves network stability and patient safety; this includes product certification and testing 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 December 2018, the first of several Network Alliance participants have successfully migrated to upgraded solutions via their active testing in the production environment.

6. An EHR is deemed certified under the ONC Certification Program which currently specifies the conducting of e-prescribing transactions using NCPDP SCRIPT Standard v10.6. Will that specific requirement be updated to reflect the new SCRIPT Standard v2017071?

- We understand that the ONC has drafted a Notice of Proposed Rule Making (“NPRM”) that would issue new certification requirements under the Certification Program.
- While ONC is prohibited by law from disclosing what is contained in the NPRM, we have high confidence that the NPRM adopts NCPDP SCRIPT Standard v2017071 as the new e-prescribing standard under the Certification Program.

7. When can we expect CMS to provide interim guidance that addresses the conflict between the CMS and ONC mandates?

- In the absence of any further regulatory action, until the new certification rule is finalized, there is a conflict between what CMS has mandated under the Part D Program (SCRIPT 2017071) and what ONC currently mandates under the Certification Program (SCRIPT Version 10.6).
- This conflict places providers in the position of having CMS under Part D require SCRIPT 2017071 while at the same time having CMS penalize providers under the PI Program for using SCRIPT 2017071 and not SCRIPT Version 10.6 (because ONC has not yet adopted named SCRIPT 2017071 under the Certification Program).
- Staff at ONC and CMS have indicated a willingness to address this gap.
8. What steps is Surescripts taking on behalf of the Network Alliance to address the conflict between the ONC Certification Program criteria and the CMS Part D requirements?

- Surescripts has been actively engaged with both ONC and CMS on a frequent basis, and will continue that activity to advocate for a reasonable path forward for our Network Alliance participants.
- Staff at ONC and CMS have indicated a willingness to address this gap, and continue to consider our input and representation of the Alliance.

9. 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 Standard v2017071 (once to obtain Surescripts certification and possibly again to obtain ONC certification)?

- Without harmonization between the Part D Program and the 2018 PI Certification Program, there is a challenge for the EHR community. We are encouraging EHRs to certify to our implementation of SCRIPT 2017071 as soon as possible in order to be prepared for the January 1, 2020, mandate under the Part D Program. But those same EHRs will not be able to engage with ONC-ATLs and ONC-ACBs to certify for SCRIPT 2017071 under the Certification Program until after the final new certification rule is issued, which is not likely to occur until after January 1, 2020.
- This puts the EHRs in the position of having to certify their implementation of SCRIPT 2017071 with Surescripts to gain access to our network, and then one to two years later certify their implementation of SCRIPT 2017071 again with an ONC-ATL under the Certification Program. Staff at ONC recognize this problem and the resulting inefficiency.
- In order to address this problem, we are in the process of applying to be an ONC-ATL for purposes of e-prescribing transactions. This is an internal Surescripts effort, and while not guaranteed, we have a high degree of confidence that we will be awarded ONC-ATL status.
- We intend to certify (as Surescripts for purposes of access to the network) most if not all of the EHRs for SCRIPT 2017071 before January 1, 2020, and certainly by the time of our December 1, 2020 sunset date.
- Given that the new ONC certification rule likely will not be finalized until after January 1, 2020, EHRs would then be in the position of certifying with us (as Surescripts for access to the network) on SCRIPT 2017071 before the issuance of the new certification rule, and then having to certify with us (as an ONC-ATL for purposes of the Certification Program) again after the issuance of the new certification rule.
- In order to address this, we will ask ONC to consider granting us retroactive status as an ONC-ATL, meaning that certifications that we would grant prior to the issuance of the new certification rule would apply for purposes of the Certification Program once the final rule is issued. No assurances can be given that ONC will be able to grant us retroactive status.
10. **What Surescripts resources are available for my migration to the updated solutions?**

Surescripts is supporting the transition to the NCPDP SCRIPT Standard v2017071 through:

- A dedicated, informational email series that provides relevant information regarding early-adopter insights, tools, timelines, 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.
- An Early Adopter program with a group of Network Alliance participants.
- Access to Early Adopter versions of documentation and Guides.
- Availability of version translations so you can migrate independently with minimal disruption.
- Notification of version numbering nomenclature changes.
- A dedicated Integration Project Manager when you are ready to begin your certification project.

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.

For further questions or insights, please contact your Surescripts Account Manager.