

# Pharmacist Prescribers May Continue To Use NPI for Medicare Part D Prescriptions

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On May 1, 2015, the Centers for Medicare & Medicaid Services published [an interim final rule](#) (IFR) for the Part D prescription drug plan benefit for the 2016 calendar year. The IFR rule addressed the concerns raised as a result of the May 23, 2014 final rule for the Part D prescription drug plan benefit for the 2015 calendar year ([see “Background”](#)).

The IFR states that

*...Part D sponsors will not be required to reject pharmacy claims or deny beneficiary requests for reimbursement for prescriptions written by "other authorized prescribers" on the basis that the prescriber is not enrolled in or opted-out of Medicare. Therefore, Part D sponsors will continue to be able to cover pharmacy claims at the point of sale (POS) for prescriptions written by "other authorized prescribers," provided all other existing Part D coverage requirements are met.*

and

*An "other authorized prescriber" must have an active and valid NPI which is contained in the pharmacy claim. This change will help beneficiaries to continue to receive needed prescriptions. In §423.100, we are defining "other authorized prescriber" as a person other than a physician (as defined in section 1861(r) of the Act) or eligible professional (as defined in section 1848(k)(3)(B) of the Act) who is authorized under state or other applicable law to write prescriptions. This definition, which applies to §423.120(c)(6) only, will sufficiently protect the Medicare program because "other authorized prescribers" must have prescribing authority under state or other applicable law.*

In states where pharmacists are deemed “other authorized prescribers,” they may continue to use their National Provider Identifier (NPI) when submitting a prescription to a Medicare Part D prescription plan. The new rule removes the requirement to have “(1) an approved enrollment record in the Medicare program, or (2) a valid opt-out affidavit on file with a Part A/Part B Medicare Administrative Contractor in order for a prescription to be eligible for coverage under the Part D program” as was originally required in the 2014 final rule. This requirement was problematic for pharmacists authorized to prescribe under state law since the Medicare statute does not recognize pharmacists as providers which would make them ineligible to enroll in the program or file an opt-out affidavit.