

Defense Health Agency (DHA) Uniform Business Office (UBO) Program Office Hold on Electronic Billing of HIPAA Schedule II Drugs

Overview

The Department of Health and Human Services (HHS) has adopted new HIPAA requirements for electronic health care administrative pharmacy transactions which will take effect on **Monday, September 21st, 2020**.

Beginning on that date it will be required that all electronic NCPDP D.0 transactions for HIPAA Schedule II Drugs will contain Quantity Prescribed (this is a new field separate from the existing Quantity Dispensed). However, the functionality for this new field and its transmission to ABACUS from the source systems will not be in place until **October 24th**.

What to Expect in ABACUS

To ensure compliance with these new requirements, no electronic claims for HIPAA Schedule II Drugs can be sent out until this functionality is in place. To ensure HIPAA Schedule II Drugs are not billed electronically, 2 business rules have been requested by DHA UBO to place these records on hold within ABACUS.

What users will see in ABACUS:

1. New Pharmacy (PHR) records for HIPAA Schedule II Drugs, where the patient has active Other Health Insurance (OHI) with a carrier setup to be billed electronically, will be placed on hold for review in the PHR Interface screen. These records will display a message of "*HFR-Schedule II Drug.*"
2. PHR claims with one or more HIPAA Schedule II Drug charges in Recovery which have been batched to be sent electronically will have their batch date removed and will be placed in a grouping code of "*SCHEDULE II DRUG REVIEW.*"
3. PHR records/claims with HIPAA Schedule II Drugs but which are not set to be sent electronically to Insurance Payers will still be allowed to process through the system and billed as normal.
4. PHR records/claims that do not include HIPAA Schedule II Drugs will continue to process through the system and billed as normal.

At this time, no action needs to be taken with these records and they should not be removed from their hold. Once the functionality for the new Quantity Prescribed field is in place additional guidance will be provided.