



October 24, 2016

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RE: Compound Billing Rule Clarification

Dear Ms. O'Neil:

NCPDP would like to take this opportunity to provide a recommendation to ensure the billing rules/forms align with the billing requirements within the Health Care Provider Reimbursement Manual **Rule 69L-7.020, F.A.C.** Today, the billing forms (DWC-9 and DWC-10) and associated rules provide direction to use the unique code of COMPD and to list each NDC contained in the compound. There are no instructions for providing the list of NDCs with the billing. Since individual ingredients cannot be listed on the named forms, it would appear that some sort of attachment is required. We respectfully request the Division amend the billing rules to provide clear direction.

The National Council for Prescription Drug Programs (NCPDP) creates the standards that facilitate the interchange of data amongst pharmacies, physicians, pharmacy benefits managers, payers, processors and manufacturers—including the HIPAA-named Telecommunication Standard Version D.0, the Universal Claim Form (UCF) and the Workers' Compensation/Property & Casualty Universal Claim Form (WC/PC UCF). NCPDP's Work Group 16 (WG16) Property and Casualty/Workers' Compensation is responsible for maintaining the standards and guidance specific to workers' compensation and other property/casualty lines of insurance.

The adoption of the NCPDP paper standard in the Florida Workers Compensation Health Care Provider Reimbursement Manual and the Medical Services Billing Rules would align the Florida Workers' Compensation system with national standards while accommodating unique state-specific fields to address areas of focus and/or regulatory requirements to which pharmacy billing/reporting is subject. More specifically the NCPDP WC/PC UCF supports:

- detailed ingredient-level billing for compound medications including the ingredient name, National Drug Code (NDC), quantity and cost, in addition to the dosage form and

route of administration for the final compounded product, to facilitate accurate drug utilization checks and reimbursement.

- jurisdictional fields assigned on a state-by-state basis to meet state-specific data requirements.

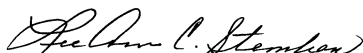
NCPDP strongly encourages the Division to consider adopting a more standardized approach for billing of pharmaceuticals, particularly compounded drugs. The industry standard is, and has been for some time, to bill compounds at the individual component ingredient NDC level using the NCPDP paper and electronic billing standards, adopted under HIPAA and by several state workers' compensation agencies.

NCPDP is a not-for-profit American National Standards Institute (ANSI)-accredited Standards Development Organization (SDO) consisting of nearly 1600 members who represent drug manufacturers, chain and independent pharmacies, drug wholesalers, insurers, mail order prescription drug companies, claims processors, pharmacy benefit managers, physician services organizations, prescription drug providers, software vendors, telecommunication vendors, industry professional societies, service organizations, government agencies, and other parties interested in electronic standardization within the pharmacy services sector of the healthcare industry.

Thank you for your consideration of our comments and recommendations. For direct inquiries or questions related to this letter, please contact:

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Sincerely,



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