June 8, 2017

Leslie Bloom
Scientific Education and Patient Advocacy
Johnson & Johnson Consumer
7050 Camp Hill Road
Fort Washington, PA 19034
LBloom@its.jnj.com

Subject: Multiple Identifiers on a single product

Dear Ms. Bloom,

NCPDP is a not-for-profit ANSI-accredited Standards Development Organization (SDO) consisting of more than 1,600 members who represent drug manufacturers, chain and independent pharmacies, drug wholesalers, insurers, mail order prescription drug companies, pharmaceutical claims processors, pharmacy benefit managers, physician services organizations, prescription drug providers, software vendors, telecommunication vendors, service organizations, government agencies, professional societies, and other parties interested in electronic standardization within the pharmacy services sector of the healthcare industry. NCPDP provides a forum wherein our diverse membership can develop solutions, including ANSI-accredited standards, and guidance for promoting information exchanges related to medications, supplies, and services within the healthcare system.

It has come to the attention of NCPDP that Johnson & Johnson Consumer is placing two identifiers with unique labeler codes on OTC Products:

- Children's Rhinocort Allergy Spray Budesonide 32mcg Nasal Spray is labeled with NDC 50580-510-01 and a UPC barcode 0045-0646-66.
- Children's Motrin Ibuprofen 100mg/5mL Suspension is labeled with NDC 50580-603-04 and a UPC barcode 0045-0603-40.
- Children's Tylenol Pain+Fever Acetaminophen 160mg/5mL Suspension is labeled with NDC 50580-614-01 and a UPC barcode 0045-0123-04

NCPDP is strongly opposed to the placement of two different identifiers on a single product and respectfully requests that you cease this practice. The use of two different identifiers is confusing and duplicative. Both 50580 and 00045 are valid Johnson & Johnson labeler codes and the majority of the industry cannot support two different identifiers for the same product. NCPDP recommends that the NDC and the barcode both use the same labeler code in order to maintain consistency in the industry as per section 4.8 of the Product Identifiers Standard v1.4:

> *"Packages will use only one unique identifier. They will not have two different identifiers for the same package, that is, the use of one number on the front panel called "NDC" and a different number in the bar code."*

NCPDP's primary concern is patient safety and use of two different identifiers can result in confusion for providers and payers which could lead to medication dispensing errors. Pharmacy automation, workflow, and processing systems are often designed to base product selection on a single identifier. When multiple

valid identifiers are available, it is difficult to ensure the correct medication is dispensed at the point of care.

NCPDP shares with you the common industry objective of medication dispensing safety and to that end thank you for consideration of its request.

For direct inquiries or questions related to this letter, please contact

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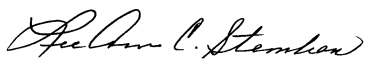
Respectfully,



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cc:
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