

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
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Ms. Kittye Krempin  
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NCPDP  
9240 East Raintree Drive  
Scottsdale, AZ 85260-7518

Delivered via Email at [kkrempin@ncdp.org](mailto:kkrempin@ncdp.org)

Dear Ms. Krempin,

Thank you for the opportunity to review and comment on the recent white paper entitled *Recommendations for Use of the NCPDP Telecommunication Standard to Prevent Use of Copayment Coupons by Medicare Part D Beneficiaries and Applicability to other Federal Programs*. The purpose of this letter is to convey our responses to the recommendations listed on Page 13 of the white paper on behalf of the Centers for Medicare & Medicaid Services (CMS) Medicare Drug Benefit and C & D Data Group (MDBG).


From a Medicare Part D prospective, we believe that the Adjudicated Program Type and Other Payer Adjudicated Program Type is the preferred option among those explored by the Task Group. The Adjudicated Program type offers both a mechanism to identify payer types and also enables transparency around copay coupon use.

As the white paper correctly acknowledges, successful implementation of the Adjudicated Program Type depends upon the industry's universal adoption of the standard. Historically, CMS has endorsed NCPDP-recommended standards, and should the new field be included in the next Telecommunications Standard, Part D plans would be required to provide the information.

We understand the industry's need to identify which programs are considered "Federal Programs" for purposes of copayment coupons. We are working to get that information to you as soon as we are able.

Finally, we want to commend the Task Group's efforts in developing a detailed response to a particularly complex issue.

Sincerely,



Amy Larrick Chavez-Valdez  
Director, Medicare Drug Benefit and C & D Data Group  
Centers for Medicare and Medicaid Services