



November 3, 2017

Michigan Department of Licensing and Regulatory Affairs
Workers' Compensation Agency - Health Care Services Division
ATTN: David Campbell

Via email: campbelld5@michigan.gov

RE: Comments on Proposed Amendments to Workers' Compensation Health Care Services Rules

The National Council for Prescription Drug Programs (NCPDP) is a not-for-profit ANSI-Accredited Standards Development Organization (SDO) consisting of more than 1,600 members who are 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.

NCPDP creates the standards that facilitate the interchange of data among pharmacies, physicians, pharmacy benefits managers, payers, processors and manufacturers—including the 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.

NCPDP supports the Workers' Compensation Agency's proposed addition of language to the workers' compensation health care services rules removing the requirement for pharmacies to bill with state-specific "WC700" dispense fee codes.

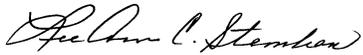
Since proprietary billing codes are not allowed under HIPAA, none of the NCPDP standards in use in the healthcare industry support the existing WC700 codes. The Agency has adopted the NCPDP paper form (WC/PC UCF) for pharmacy billing, and pharmacies billing electronically use the Telecommunication Standard. Neither of these standards support the existing WC700 codes. These standards have discrete fields for the "Dispensing Fee Submitted" and "Other Amount Claimed Submitted" where the information conveyed using the WC700 codes is submitted, making use of specific codes unnecessary. These discrete fields are also used when a pharmacy submits a compounding fee.

NCPDP supports the Agency's proposed addition of language stating that when the adopted NCPDP form is used for billing by an outpatient pharmacy, the dispense fee shall be billed without use of the state-specific WC700 codes.

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

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Sincerely,



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