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Center for Medicare

Re: CMS-4182-F, Reducing the Burden of the Compliance Program Training Requirements (§§ 422.503 and 423.504)

NCPDP is a not-for-profit ANSI-Accredited Standards Development Organization (SDO) consisting of more than 1,400 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.

In August 2014, NCPDP formed the Standardized Fraud, Waste and Abuse (FWA) Training Attestation Task Group with the goal of eliminating the financial burden to pharmacies resulting from multiple plan sponsors' requirements to complete individual Fraud, Waste and Abuse training attestations. It was noted all of these plan sponsors linked their training requirements to the CMS Medicare Learning Network (MLN) training module. As a result, the task group developed an electronic Fraud, Waste and Abuse (FWA) Training Attestation that linked to MLN. The Attestation Form was developed through a collaborative and consensus-based process that included participation and representation by impacted stakeholders. As of 2017, over 90% of pharmacies annually complete this standardized form and to our knowledge, plan sponsors are using this form without issue.

After review of CMS-4182-F, Reducing the Burden of the Compliance Program Training Requirements, we have the following questions:

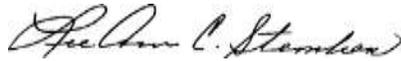
1. Are First-Tier, Downstream and Related Entities (FDRs), including pharmacy providers, still required to have CMS Compliance and FWA training?
2. The task group is unaware of plan sponsors that did not accept the CMS Compliance and FWA training. Do the inquiries and concerns noted on page 629 of CMS-4182-F predate the NCPDP approved solution implemented in 2016? We ask this because we are experiencing great success in eliminating multiple sponsors' forms with the NCPDP Standardized FWA Attestation that links to the MLN training. The form is attached for your review and consideration.

3. Does CMS plan to maintain the MLN for CMS Compliance and FWA training? Should CMS choose NOT to maintain this training module, companies may need to develop and maintain costly alternatives to the NCPDP Standardized FWA Attestation and the pharmacies will have their financial burden reestablished.

We appreciate your consideration of this inquiry and request a response by June 30, 2018. Your timely response is needed in order for NCPDP and industry stakeholders to coordinate the necessary communications and system development in the event the MLN Compliance FWA training module will be discontinued. If you would prefer to discuss this request with the task group, please use the contact information below.

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



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Attachment: NCPDP Standardized Fraud, Waste and Abuse Training Attestation Form

cc: Vikki Ahern, CMS
Shelly Winston, CMS