

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C5-12-12
Baltimore, Maryland 21244-1850



Center for Medicare

JUL 23 2018

Ms. Lee Ann C. Stember
President & CEO
National Council for Prescription Drug Programs (NCPDP)
9240 E. Raintree Drive
Scottsdale, AZ 85260

Dear Ms. Stember:

Thank you for sharing your concerns regarding the Medicare Part D opioid-related strategies in the final 2019 Call Letter published on April 2, 2018.

As you know, the opioid crisis has been declared a nationwide Public Health Emergency. The Centers for Medicare & Medicaid Services is committed to working with patients, sponsors, prescribers, pharmacists, and other stakeholders to effectively address the prescription opioid epidemic while maintaining access to needed medications. In the 2019 Call Letter, CMS announced a number of new policies to further help Part D sponsors prevent and combat prescription opioid abuse through coordination by leveraging patient-prescriber-pharmacist relationships. We received a significant number of comments in response to the draft 2019 Call Letter, which we carefully considered before finalizing the policies in the final Call Letter. The care coordination edit, which involves a similar process for prescriber consultation and coordination as originally proposed with the hard edits, is attached to soft edits that plans already have in place and can be resolved at point of sale by a pharmacist.

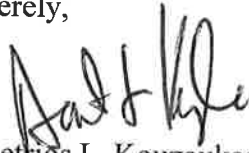
We understand your concerns about the operational challenges. We look forward to working with your organization as you collaborate with industry to modify existing telecommunication system standards, including codes and messaging, to accommodate the new strategies. For example, NCPDP may help establish a pathway to overcome the operational issues to implement these important strategies in 2019, including interim and long-term steps.

In addition, we will work with stakeholders to prepare for the implementation of this guidance in 2019. We announced that we will conduct a pilot this year to test the new safety edits. Pilot participants may test coding and specifications, pharmacy preparedness, and provider education. CMS plans to issue additional operational guidance and any best practices learned from the pilot this fall.

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We appreciate your efforts to address this devastating epidemic, and in this same spirit, we appreciate you writing to express your concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Demetrius L. Kouzoukas". The signature is fluid and cursive, with the first name being the most prominent.

Demetrius L. Kouzoukas
Principal Deputy Administrator and
Director, Center for Medicare