



September 18, 2018

Marylou Sudders
Secretary for MassHealth
Executive Office of Health and Human Services
One Ashburton Place, 11th Floor
Boston, MA 02108
marylou.sudders@state.ma.us

Re: Chapter 208 of the Acts of 2018

Secretary Sudders,

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.

NCPDP members recently reviewed Chapter 208 of the Acts of 2018 – An Act for Prevention and Access to Appropriate Care and Treatment of Addiction sections 24, 71, 81 and 88 and expressed concern with the ability to efficiently support electronic billing of partial and incremental fills for Schedule II Controlled Substance (CII) prescriptions using the current Health Insurance Portability and Accountability Act (HIPAA) named version of the NCPDP Telecommunication Standard.

All covered entities communicating electronic prescription claim billing transactions must use the current HIPAA adopted version of the NCPDP Telecommunication Standard Implementation Guide, Version D.0 published August 2010. In order for a health care service plan or an insurer to appropriately identify that an incremental (partial) fill of the original prescribed quantity is requested for payment, both the quantity prescribed and quantity dispensed values must be submitted on the claim. The Quantity Prescribed field is not available in the current HIPAA adopted version of the NCPDP Telecommunication Standard and therefore, the payers do not have sufficient information to apply the necessary adjudication rules at point of service. These rules may include validating the total quantity dispensed does not exceed the quantity prescribed and calculating copays to comply with regulations.

Stakeholders identified the need for the Quantity Prescribed field in 2012 as a result of Medicare Part D processes. NCPDP submitted a request to Health and Human Services (HHS) to update the HIPAA named version to the Telecommunication Standard Implementation Guide Version D.0 published November 2012. HHS determined this request must follow the HIPAA rule-making process. The timeline of activity regarding this request is available at <http://www.ncdp.org/Resources/HIPAA-Information> by selecting Implementation Guide Corrections.

NCPDP has notified HHS of the Massachusetts requirement and the urgency to update the HIPAA named version of the standard so health care service plans and insurers can meet the Massachusetts requirement.


Thank you for your consideration to these barriers impacting the pharmacy industry.

NCPDP respectfully requests an acknowledgment of your receipt of this letter.

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

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Sincerely,



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