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CMS

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NCPDP is a not-for-profit ANSI-accredited Standards Development Organization consisting of more than 1,500 members who represent drug manufacturers, chain and independent pharmacies, drug wholesalers, insurers, mail order prescription drug companies, claims processors, pharmacy benefit managers, physician services organizations, prescription drug providers, software vendors, telecommunication vendors, service organizations, government agencies and other parties interested in electronic standardization within the pharmacy services sector of the health care industry.

NCPDP provides a forum wherein our diverse membership can develop business solutions, including ANSI-accredited standards, and guidance for promoting information exchanges related to medications, supplies, and services within the healthcare system. Through a consensus building process in collaboration with other industry organizations, our members develop these solutions to improve safety, privacy and healthcare outcomes for patients and healthcare consumers, while reducing costs in the system.

NCPDP supports the removal of Subpart E-Standard Unique Health Identifier for Health Plans at 45 CFR 162 as well as the definitions of Controlling Health Plan (CHP) and Subhealth Plan (SHP) at 45 CFR 162.103. As previously communicated in comments to the National Committee on Vital and Health Statistics and to CMS-0040-P, the Health Plan Identifier and Other Entity Identifier were not going to be used in the NCPDP HIPAA adopted transactions.

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

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Sincerely,

A handwritten signature in black ink, appearing to read "Lee Ann C. Stember". The signature is written in a cursive, flowing style.

Lee Ann C. Stember

President & CEO

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