



Date: June 3, 2019

Department of Health and Human Services
Office of the National Coordinator for Health Information Technology
Mary E. Switzer Building
Mail Stop: 7033A
330 C Street SW
Washington, DC 20201

Re: 21st Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT
Certification Program Proposed Rule
ONC 170.315(b)(11) Electronic prescribing Test Procedures

Dear Dr. Rucker,

The National Council for Prescription Drug Programs (NCPDP) is a not-for-profit American National Standards Institute (ANSI) accredited Standards Development Organization (SDO) consisting of more than 1,500 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 is providing the following comments regarding the *ONC 170.315(b)(11) Electronic prescribing Test Procedures*.

§ 170.205(b)(1) National Council for Prescription Drug Programs (NCPDP), Script Standard Implementation Guide, Version 2017071 NCPDP Comments:

NCPDP recommends that compliance with the certification mandates, effective January 1, 2020, focus on currently required transactions with a phased-in approach for certifying the proper implementation of newly named transactions. Certification should not be required for newly named transactions until they are more widely adopted per the Interoperability Standards Advisory (ISA). Additionally, certification requirements should be focused on applicable transactions and related practice settings, as detailed below.

Transaction Names	Transaction is currently in broad use (Y/N)	Applicable to all practice settings (Y/N)	Optional or Required for Certification (O/R)	Certification Requirement Notes
GetMessage	Y	N	O	Transaction is not necessary when transacting real time messaging; recommend certification be optional.
Status	Y	Y	R	Since the transaction is an acknowledgement, it would not contain "reason for prescription" as referenced in (b)(11)(ii) or (iii).
Error	Y	Y	R	Since the transaction is an acknowledgement, it would not contain "reason for prescription" as referenced in (b)(11)(ii) or (iii).
NewRx	Y	Y	R	
NewRxRequest	N	Y	O	Certification should not be required until the transaction is more widely adopted, per the Interoperability Standards Advisory (ISA).
NewRxResponseDenied	N	Y	O	Certification should not be required until the transaction is more widely adopted, per the Interoperability Standards Advisory (ISA).
RxChangeRequest	Y	Y	R	
RxChangeResponse	Y	Y	R	
RxRenewalRequest	Y	Y	R	
RxRenewalResponse	Y	Y	R	
Resupply	Y	N	O	Transaction is applicable only to LTC practice settings. Recommend certification requirements only in LTC practice settings.
Verify	Y	Y	R	Since the transaction is an acknowledgement, it would not contain

Transaction Names	Transaction is currently in broad use (Y/N)	Applicable to all practice settings (Y/N)	Optional or Required for Certification (O/R)	Certification Requirement Notes
				"reason for prescription" as referenced in (b)(11)(ii) or (iii).
CancelRx	Y	Y	R	
CancelRxResponse	Y	Y	R	
RxFill	Y	Y	R	
RxFillIndicatorChange	N	Y	O	Certification should not be required until the transaction is more widely adopted, per the Interoperability Standards Advisory (ISA).
DrugAdministration	Y	N	O	Transaction is applicable only to LTC practice settings. Recommend certification requirements only in LTC practice settings.
RxTransferRequest	N	N	None	Electronic Health Record systems do not use this transaction; transfer transactions only apply to non-hospital pharmacies. Therefore, certification is not applicable and should be removed.
RxTransferResponse	N	N	None	Electronic Health Record systems do not use this transaction; transfer transactions only apply to non-hospital pharmacies. Therefore, certification is not applicable and should be removed.
RxTransferConfirm	N	N	None	Electronic Health Record systems do not use this transaction; transfer transactions only apply to non-hospital pharmacies.

Transaction Names	Transaction is currently in broad use (Y/N)	Applicable to all practice settings (Y/N)	Optional or Required for Certification (O/R)	Certification Requirement Notes
				Therefore, certification is not applicable and should be removed.
Recertification	N	N	O	Transaction is applicable only to LTC practice settings. NCPDP Recommend certification requirements only in LTC practice settings.
RxHistoryRequest	Y	Y	R	
RxHistoryResponse	Y	Y	R	
REMSRequest	N	N	O	Transaction needs to be adopted by a manufacturer/REMS administrator before being added to certification. Certification should not be required until the transaction is more widely adopted, per the Interoperability Standards Advisory (ISA).
REMSResponse	N	N	O	Transaction needs to be adopted by a manufacturer/REMS administrator before being added to certification. Certification should not be required until the transaction is more widely adopted, per the Interoperability Standards Advisory (ISA).
REMSInitiationRequest	N	N	O	Transaction needs to be adopted by a manufacturer/REMS administrator before being added to certification. Certification should not be required until the transaction is more widely adopted, per the Interoperability Standards Advisory (ISA).
REMSInitiationResponse	N	N	O	Transaction needs to be adopted by a manufacturer/REMS administrator before being added to certification.

Transaction Names	Transaction is currently in broad use (Y/N)	Applicable to all practice settings (Y/N)	Optional or Required for Certification (O/R)	Certification Requirement Notes
				Certification should not be required until the transaction is more widely adopted, per the Interoperability Standards Advisory (ISA).

Section Testing Tool

NCPDP Comments:

Correct link: [NCPDP Electronic Prescribing \(eRx\)](#)

Section Test Tool Data

NCPDP Comments:

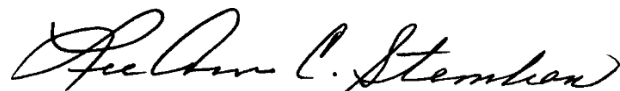
Correct link: [NCPDP Electronic Prescribing \(eRx\)](#)

In conclusion, NCPDP and its members would like to thank ONC for the opportunity to provide written comments on the *ONC 170.315(b)(11) Electronic prescribing Test Procedures*.

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

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Sincerely,



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cc: NCPDP Board of Trustees