



June 17, 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: Trusted Exchange Framework and Common Agreement (TEFCA)

The National Council for Prescription Drug Programs (NCPDP) appreciates the opportunity to respond to the *Trusted Exchange Framework and Common Agreement (TEFCA)* on behalf of industry stakeholders. NCPDP is a not-for-profit American National Standards Institute (ANSI) accredited Standards Development Organization (SDO) consisting of more than 1,600 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.

Regarding interoperability, NCPDP recommends ONC continue to work with NCPDP and other SDOs to produce and promote standards that will further enhance the exchange of electronic health information to improve interoperability and usability and to reduce administrative burdens. Further, NCPDP requests ONC's support in calling out the importance of transparency and interoperability of patient clinical information (e.g. diagnosis codes, and other clinical measures). These values are currently available to be transmitted on an electronic prescription using the NCPDP SCRIPT Standard. Unfortunately, clinical information is not regularly communicated to pharmacies due to lack of understanding of their value as well as current EHR workflow issues with sending the data.

NCPDP continues to improve previously referenced standards, such as the widely used SCRIPT Standard and Telecommunication Standard, and the following NCPDP standards to promote the electronic exchange of health information:

1. Audit Transaction Standard
2. Batch Standard
3. Benefit Integration Standard
4. Billing Unit Standard
5. Financial Information Reporting Standard
6. Formulary and Benefit Standard
7. Manufacturer Rebate Standard
8. Medical Rebate Data Submission Standard
9. Post Adjudication Standard

10. Prescription Transfer Standard
11. Product Identifiers Standard
12. Retiree Drug Subsidy Standard
13. Specialized Standard
14. Specialty Pharmacy Data Reporting Standard
15. Uniform Healthcare Payer Data Standard
16. Prescription Drug Monitoring Programs (PDMP) Reporting Standard

NCPDP is also developing new standards to meet industry needs such as the Real-Time Prescription Benefit Standard to convey real-time prescription benefit information to providers at the point of prescribing, the Medication List Transaction to report dispensed medication information to Health Information Exchanges (HIEs), and the Government Programs Encounter Reporting to support a common format among states for Managed Care Organizations to use in Medicaid encounter reporting. NCPDP continues to collaborate with other SDOs to ensure alignment between standards and support of emerging frameworks such as Fast Healthcare Interoperability Resources (FHIR®).

NCPDP requests ONC allow adequate time and support for testing and implementation before any standards are required for use as new standards are developed.

Additional Comments:

ONC Request for Comment #8:

“There are many possible approaches to Patient Identity Resolution, each with its own benefits and risks. For example, a centralized index of patient identity information may be more efficient for resolving patient identities across disparate communities, but also poses a greater risk to privacy if the system is compromised. Federated approaches may be less susceptible to external threats like cyberattacks, but harder to scale across many communities. Recognizing that new technologies and business entities with robust identity matching solutions may disrupt traditional approaches, should the QTF specify a single standardized approach to Patient Identity Resolution across QHINs?”

NCPDP Comments:

NCPDP encourages ONC to explore implementation of a patient matching solution that allows disparate healthcare organizations to exchange patient information across enterprise boundaries. NCPDP recommends ONC support industry-led efforts to have reliable identity matching. NCPDP’s Universal Patient Identifier (UPI)® (<https://ncdpd.org/Products/NCPDP-Universal-Patient-Identifier>) could be used for this purpose.

There are numerous propriety patient identifier solutions besides NCPDP’s UPI®. A patient identifier can be used to exchange information amongst different healthcare entities addressing patient safety, financial and operational challenges across the QHINs. Through its real-time and interoperable Telecommunication Standard and the NCPDP SCRIPT Standard, NCPDP has the unique ability to propagate a patient identifier throughout the pharmacy system and ultimately throughout the entire healthcare ecosystem.

The intent of a patient identifier is to correctly identify the patient, therefore establishing the foundation for exchanging patient information across the healthcare ecosystem. This will provide the following benefits:

1. Reduce medical/medication errors and improve patient safety;
2. Improve care coordination, population health management, prescription drug monitoring programs (PDMP); and
3. Reduce human and financial resources needed to reconcile duplicate records and billing/claims errors.

Additionally, the following NCPDP Standards were identified as being applicable for communicating a patient identifier and were modified accordingly through the NCPDP consensus-based process:

1. Post Adjudication Standard
2. Prescription Drug Monitoring Programs (PDMP) Reporting Standard
3. Prescription Transfer Standard
4. Prior Authorization Transfer Standard
5. SCRIPT Standard
6. Specialized Standard
7. Specialty Data Reporting Standard
8. Telecommunication Standard
9. Uniform Healthcare Payer Data Standard
10. Batch Standard Subrogation Standard

Audit, Billing Unit, Formulary & Benefit, Product Identifiers, Retiree Drug Subsidy, UCF/Workers Comp Claim Form, Financial Information Reporting and Rebate Standards are the only standards that have been determined to not be applicable at this time. At such time these or any future standards are determined to be applicable, a patient identifier field will be added to them.

NCPDP recommends any identifier selected by ONC be openly available to any healthcare organization that exchanges patient data and address privacy protections. If ONC chooses not to name a specific vendor product for patient identification, NCPDP recommends ONC work with an ANSI-accredited SDO, such as NCPDP, to establish standards that facilitate the sharing of patient matching information across disparate healthcare organizations and provide the industry with a listing of endorsed identity matching services or products. Such a list could be made available in ONC's Interoperability Standards Advisory (ISA). The listing should only contain products that meet reliability standards set by ONC.

ONC Request for Comment #9:

“Different communities tolerate different degrees of risk with respect to accurately matching patient identities. Should QHINs meet a minimum performance standard (e.g., a minimum acceptable matching accuracy rate) over a specified time period? Likewise, different algorithmic techniques for matching patient identities use different approaches and must be tuned to the applicable patient population and continuously refined over time. Should QHINs measure and report on the performance of the algorithm(s) they rely on (e.g., by calculating precision, recall, etc.)?”

NCPDP Comments:

NCPDP encourages QHINs to measure and report on the performance of various patient matching solutions that allow disparate healthcare organizations to exchange patient information across enterprise boundaries. Further, NCPDP recommends ONC support industry-led efforts to have reliable identity matching. NCPDP's Universal Patient Identifier (UPI)[®] is one solution that could be used for this purpose, as discussed above.

In conclusion, NCPDP and its members would like to thank HHS for the opportunity to provide written comments on *ONC's Trusted Exchange Framework and Common Agreement (TEFCA)*.

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