



November 25, 2019

[Nikki Majewski](#)

Chief, Health Information Technology
Maryland Health Care Commission
Center for Health Information Technology and Innovative Care Delivery

RE: New Transaction for Pharmacy Reporting of Dispensed Medication

Dear Ms. Majewski,

The National Council of Prescription Drug Programs (NCPDP) is a not-for-profit, ANSI-Accredited Standards Developer (ASD) consisting of more than 1,700 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.

House Bill 115 originally proposed the Maryland Health Care Commission (MHCC) adopt regulations for pharmacies to report non-Controlled Drug Substances (CDS) prescriptions dispensed using the existing Prescription Drug Monitoring Program (PDMP) infrastructure supported by the Chesapeake Regional Information System for our Patients (CRISP). The notion of moving the bill forward to require a non-CDS reporting mandate prompted concerns among some stakeholders. In response, the legislature concluded that a study was needed to evaluate these and other issues that may be identified before finalizing legislation. Instead, the final version of HB 115 that passed during the 2018 legislative session required the MHCC to convene interested stakeholders, including NCPDP, for purposes of conducting a study to assess the benefits and feasibility of developing an electronic system (system or statewide repository) of patient prescription medication history. In April 2019, the resulting working group published Maryland Health Care Commission – Electronic Prescription Records System – A Report to the Governor and General Assembly. The proposed electronic system would collect and make available to treating health care providers (providers or practitioners) and dispensers (collectively authorized users) information on non-CDS dispensed in Maryland. Currently, the PDMP information on CDS Schedules II through V dispensed in Maryland is available to authorized users.

NCPDP's understanding is the proposed electronic system would provide a broad array of clinical encounter information to the participating providers including lab and radiology reports and patient care summaries. However, a method to obtain non-CDS was specifically needed. The NCPDP MedicationList Transaction can be used for the purpose of reporting information on non-CDS dispensed in Maryland.

The NCPDP Dispensed Medication Task Group developed and published the MedicationList Transaction in
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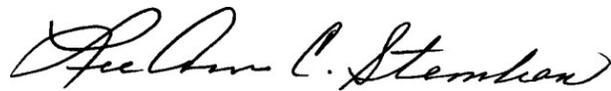
July 2019 as a standardized format to enable pharmacies to report all dispensed medications to other healthcare entities, such as Health Information Exchanges (HIEs). This new transaction is available for implementation by the industry within the ANSI accredited NCPDP SCRIPT Implementation Guide Version 2019071.

The MedicationList transaction is designed to accommodate multiple patients and multiple dispensing events and is more suitable for pharmacy reporting of dispensed medication data to HIEs than other reporting standards. The MedicationList transaction allows for reporting of all medications/products dispensed from dispensing entity/entities within a specified time period for multiple patients along with any relevant dispensing information within a single transaction regardless of payment source (plan or patient).

The proposed system will need to consume the data submitted from a dispensing entity using this transaction. Participating provider(s) would request a medication history for an individual patient, or a more comprehensive view of the patient's care including additional clinical information. The MedicationList Transaction assumes the proposed system will manage patient consent.

NCPDP respectfully requests MHCC review the NCPDP MedicationList Transaction and consider recommending this transaction as the format used for pharmacy reporting of claim data of dispensed medications/products. NCPDP looks forward to working with the MHCC. For technical details on the NCPDP MedicationList Transaction and/or if you would like an overview of the transaction, please contact Teresa Strickland, Technical Advisor, at tstrickland@ncdp.org.

Sincerely,



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cc: NCPDP Board of Trustees