



Submitted December 15, 2021 electronically at: www.regulations.gov

Anne Milgram, Administrator
Drug Enforcement Administration
8701 Morrisette Drive
Springfield, Virginia 22152

**Re: 21 CFR Part 1306 Transfer of Electronic Prescriptions for Schedules II–V Controlled Substances
Between Pharmacies for Initial Filling**

Dear Administrator Milgram:

The National Council for Prescription Drug Programs (NCPDP) is a not-for-profit, American National Standards Institute (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.

For over 40 years, NCPDP has been committed to furthering the electronic exchange of information between healthcare stakeholders. The NCPDP Telecommunication Standard is the standard used for eligibility, claims processing, reporting and other functions in the pharmacy services industry as named in Health Insurance Portability and Accountability ACT (HIPAA). The NCPDP SCRIPT Standard, Telecommunication Standard and the Formulary and Benefit Standard are the standards in use in electronic prescribing as named in Medicare Modernization ACT (MMA).

NCPDP submits the following comments in response to RIN 1117–AB64/Docket No. DEA–637:

NCPDP supports the proposed changes to 21 CFR Part 1306 to allow for the transfer of unfilled, electronic prescriptions for controlled substances, on a one-time basis.

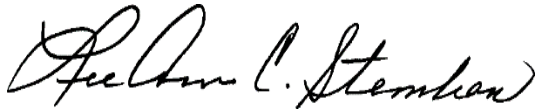
The NCPDP SCRIPT Standard enables workflow efficiencies and enhances prescription accuracy with transactions supporting new prescriptions, prescription changes, renewal requests, prescription fill status notification, prescription cancellation and pharmacy to pharmacy prescription transfer. NCPDP recently approved changes to the standard that enhance the transactions for pharmacy to pharmacy prescription transfer to include support for the one-time transfer of electronic prescriptions for controlled substances.

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

Teresa Strickland

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Respectfully,

A handwritten signature in black ink that reads "Lee Ann C. Stember". The signature is written in a cursive style with a large initial 'L'.

Lee Ann C. Stember
President & CEO
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