



January 14, 2022

Maureen Connors  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services

Re: Next version of SCRIPT Standard Recommendations

Dear Ms. Connors,

The National Council for Prescription Drug Programs (NCPDP) requests the regulatory process begin to replace the NCPDP SCRIPT Standard Version 2017071 at § 423.160 *Standards for electronic prescribing* with the next version of the electronic prescribing standard, NCPDP SCRIPT Standard Version 2022011.

Since NCPDP and the industry last provided information regarding electronic prescribing versions for Medicare adoption, valuable improvements have been made to the SCRIPT standard. Some of the major enhancements are listed below.

- Extensibility
- Redesign of the Product/Drug groupings
  - DrugCoded – Mandatory NDC Number
  - Compound Information – no change to requirements
  - NonDrugCoded – does not require NDC
- Added Observation elements to REMS transactions
- Added ProhibitRenewalRequest to RxChangeResponse and RxRenewalResponse
- Added Push or Unsolicited options to RxTransfer
- Structured and Codified Sig Structure was modified
- Added support for
  - Dental Procedure Codes
  - RxBarCode
  - PatientConditions
  - SexAssignedAtBirth
  - TherapeuticSubstitutionIndicator
  - Patient Pronouns
  - Multi-party communications and withdrawal/retracting of a previous sent message using the MessageIndicatorFlag

Version 2022011 of the SCRIPT Standard is backward compatible with Version 2017071. A detailed list of modifications is attached.

**NCPDP SCRIPT Standard transactions:**

Along with the transactions listed at § 423.160 (b) (2) (iv)\*\*,

(A) GetMessage. (B) Status. (C) Error. (D) NewRxRequest. (E) NewRx. (F) RxChangeRequest.  
(G) RxChangeResponse. (H) RxRenewalRequest. (I) Resupply. (J) RxRenewalResponse. (K) Verify.  
(L) CancelRx. (M) CancelRxResponse. (N) RxFill. (O) DrugAdministration. (P) NewRxRequest.  
(Q) NewRxResponseDenied (R) RxTransferRequest. (S) RxTransferResponse.  
(T) RxTransferConfirm. (U) RxFillIndicatorChange. (V) Recertification.  
(W) REMSInitiationRequest. (X) REMSInitiationResponse. (Y) REMSRequest. (Z) REMSResponse.

\*\* Please note NewRXRequest is listed twice (D) and (P). (R) RxTransferRequest has been renamed to RxTransferInitiationRequest and (S) RxTransferResponse has been renamed to RXTransfer

NCPDP is requesting the following transactions be adopted as mandatory transactions:

PAInitiationRequest  
PAInitiationResponse  
PARRequest  
PARResponse  
PAAppealRequest  
PAAppealResponse  
PACancelRequest  
PACancelResponse  
PANotification

NCPDP is requesting the following transactions be adopted as optional transactions:

RXHistoryRequest  
RXHistoryResponse  
MedicationList  
ServiceReferralRequest  
ServiceReferralResponse  
RequestForServiceReferral  
ResponseToServiceReferralDenied  
ServiceDocumentation

**NCPDP recommends the regulations be published with an eighteen (18) month transition period and a twenty-four (24) implementation timeframe which preferably doesn't fall on January 1st.**

The industry is committed to following a regular schedule for transitioning to updated versions of SCRIPT and would appreciate CMS' support in adherence to the schedule desired. Following the schedule allows for more effective planning and smoother implementations, as the magnitude of changes is more manageable when there is a predictable schedule. The industry is also preparing for transitions and implementations of other standards, such as for claims, formulary and benefit and real-time prescription benefit (RTPB), which will greatly impact pharmacies. It is important to balance the timelines to ensure the industry can adequately program, test and implement the changes so that patient care is not disrupted.

If I can be of further assistance, please contact me.

Sincerely,  
/s/

Margaret Weiker  
Vice-President, Standards Development  
National Council for Prescription Drug Programs (NCPDP)  
[standards@ncdp.org](mailto:standards@ncdp.org)

cc: Shelly Winston, CMS

Attachment: Detailed Change Log from SCRIPT Version 2017071 to Version 2022011