



April 8, 2022

HHS Secretary Xavier Becerra  
Via email – [xavier.becerra@hhs.gov](mailto:xavier.becerra@hhs.gov)

Dear Secretary Becerra,

The time is now to issue the Notice of Proposed Rule Making (NPRM) for the NCPDP Telecommunication Standard Implementation Guide Version F6, the Batch Standard Implementation Guide Version 15 and the Subrogation Implementation Guide for Batch Standard Version 10. The NPRM and subsequent final rule will assist the department in meeting one of its' priorities – reducing healthcare costs by reducing administrative costs.

The timeline associated with this request is as follows:

- August 17, 2017, the following Change Requests were submitted to the DSMO
  - Change Request 1201
    - Telecommunication Standard Implementation Guide Version F2
    - Batch Standard Implementation Guide Version 15
  - Change Request 1202
    - Subrogation Implementation Guide for Batch Standard Version 10 for Medicaid use only
- January 9, 2018 - DSMO Letter to NCVHS
- March 26, 2018 - NCVHS Hearing
- May 17, 2018 - NCVHS [Letter](#) to HHS
- November 10, 2019 – the following Change Request was submitted to the DSMO
  - Change Request 1208
    - Telecommunication Standard Implementation Guide Version F6
- January 21, 2020 - DSMO sent Letter to NCVHS
- March 24, 2020 - NCVHS Meeting
- April 22, 2020 – NCVHS [Letter](#) to HHS
- June 9, 2020 – HHS Response [Letter](#) to NCVHS

According to the Unified Regulation Agenda, an NPRM was slated for release in December 2020, September 2021, and March 2022.

These delays have caused the industry to

- Create workarounds and proprietary solutions which negatively impacts the drive toward interoperability and improved patient outcomes
- Adjust workload of resources dedicated to the development and implementation
- Compromise budgets for capital expenditures
- Alter the prioritization of other company/agency initiatives
- Further delay the implementation of versions after those in the NPRM

NCPDP will continue to offer our assistance in the effort to release the NPRM. The NPRM needs to be given a high priority and your assistance is needed to prioritize this effort.

NCPDP thanks you for considering our request.

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



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#### **About NCPDP**

Founded in 1977, NCPDP is a not-for-profit, ANSI-accredited, Standards Developing Organization with more than 1,700 members representing virtually every sector of the pharmacy services industry. Our diverse membership provides leadership and healthcare business solutions through education and standards, created using the consensus building process. NCPDP has been named in federal legislation, including HIPAA, MMA, and HITECH. NCPDP members have created standards such as the Telecommunication Standard and Batch Standard, the SCRIPT Standard for ePrescribing, the Manufacturers Rebate Standard and more to improve communication within the pharmacy industry. Our data products include dataQ<sup>®</sup>, a robust database of information on more than 80,000 pharmacies, resQ<sup>™</sup>, an industry pharmacy credentialing resource, and HCldea<sup>®</sup>, an innovative prescriber database that provides continually updated information on more than 2.5 million prescribers. NCPDP's RxReconn<sup>®</sup> is a legislative tracking product for real-time monitoring of pharmacy-related state and national legislative and regulatory activity. For more information about NCPDP Standards, Data Services, Products, Educational Programs and Work Group meetings, go online at <http://www.ncdpd.org> or call 480.477.1000.