



August 31, 2023

The Honorable Jon Santiago
Massachusetts House of Representatives
24 Beacon Street Room 155
Boston, MA 02133

The Honorable Vanna Howard
Massachusetts House of Representatives
24 Beacon Street Room 33
Boston, MA 02133

The Honorable Sal N. DiDomenico
Massachusetts State Senator for Middlesex and
Suffolk
24 Beacon Street Room 405
Boston, MA 02133

Sent via electronic mail

Re: Massachusetts H 1143 Section 6.

Dear Representatives Santiago and Howard and Senator DiDomenico:

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 1,500 members representing entities including, but not limited to, claims processors, data management and analysis vendors, federal and state government agencies, insurers, intermediaries, pharmaceutical manufacturers, pharmacies, pharmacy benefit managers, professional services organizations, software and system vendors 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 business 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.

NCPDP is writing to provide information to you about the four electronic prior authorization transactions in its SCRIPT Standard, NCPDP's Member Source™ API solutions and the mandate by Centers for Medicare & Medicaid Services (CMS) for prescribers and Medicare Part D sponsors to use the SCRIPT standard for electronic prior authorization transactions.

The NCPDP SCRIPT Standard Version 2017071, currently named in the Medicare Modernization Act (MMA), enables workflow efficiencies and enhances prescription accuracy with transactions supporting new prescriptions, prescription changes, renewal requests, prior authorization requests, prescription fill status notification, prescription cancellation and pharmacy to pharmacy prescription transfer. It includes the following transactions designed to support medication electronic Prior Authorization (ePA):

- PAInitiationRequest and PAInitiationResponse
- PARequest and PAResponse
- PAAppealRequest and PAAppealResponse
- PACancelRequest and PACancelResponse

NCPDP's Member Source™ API solutions can be implemented to comply with NCPDP's operating rules to support the XML format of SCRIPT with REST and SOAP protocols.

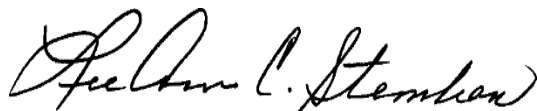
While the Health Insurance Portability and Accountability Act (HIPAA) names NCPDP's Telecommunication Standard Implementation Guide Version D.0 for prior authorization transactions for retail pharmacy drugs, these transactions are used by the pharmacy/pharmacist to request a prior authorization. These transactions are primarily used by Medicaid agencies. In § 423.160 of 42 CFR 423, CMS names the SCRIPT standard for ePA transactions between prescribers and Medicare Part D plan sponsors for Medicare Part D-covered drugs for Medicare Part D-eligible individuals.

In addition, the current based FHIR® Prior Authorization Support (PAS) Implementation Guide only supports the HIPAA mandated X12 278 transaction and drugs covered under the medical benefit. Refer to <http://hl7.org/fhir/us/davinci-pas/toc.html>.

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

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Respectfully,



Lee Ann C. Stember
President & CEO
National Council for Prescription Drug Programs (NCPDP)