



Submitted December 27, 2023

Mr. Steve Forry, Director  
Division of MSP Program Operations (DMPO)  
Centers for Medicare and Medicaid Services  
Sent via Electronic Mail

RE: Updates to the Workers' Compensation Medicare Set-Aside Arrangement (WCMSA) Self-Administration Toolkit and Reference Guide

Dear Mr. Forry,

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 advancing the electronic exchange of information between healthcare stakeholders. The NCPDP Telecommunication Standard Version D.0 is the standard used for eligibility, claims processing, reporting and other functions in the pharmacy services industry, as named in the Health Insurance Portability and Accountability Act (HIPAA). The NCPDP SCRIPT Standard Version 2017071 and the Formulary and Benefit Standard Version 60 are the standards in use in electronic prescribing, as named in the Medicare Modernization Act (MMA).

The NCPDP WG9 Workers' Compensation Medicare Set-Aside Arrangement (WCMSA) Sub-Task Group submits modifications for consideration to:

- Workers' Compensation Medicare Set-Aside Arrangement (WCMSA) Reference Guide version 3.9 in Section 4.1.3 Other Health Coverage
- Self-Administration Toolkit for Workers' Compensation Medicare Set-Aside Arrangement (WCMSAs) version 1.3 in Section 4: Using the Account and Section 8: Annual Attestation

Our recommended changes are indicated as tracked changes in the enclosed copies of the documents.

NCPDP thanks CMS for the opportunity to provide comments and for the consideration of our recommended changes. NCPDP looks forward to continuing its work with CMS.

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

Alaina Clark  
NCPDP Standards Specialist  
[standards@ncdpd.org](mailto:standards@ncdpd.org)

Respectfully,

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

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

Enclosures