



June 30, 2023

Centers for Disease Control and Prevention/
National Committee on Vital and Health Statistics (NCVHS)
3311 Toledo Road
Hyattsville, MC 20782-2002

Submitted to: NCVHSmal@cdc.gov

Re: ICD-11 RFI

To Whom It May Concern:

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.

NCPDP appreciates the opportunity to review and submit comments to NCVHS on its Request for Information (RFI) regarding timely and strategic action to inform ICD-11 policy. To our knowledge, there has been no analysis on how the transition from ICD-10 to ICD-11 will impact the pharmacy industry; however, the ICD-11 architecture is profoundly more granular than ICD-10. As such, the transition from ICD-10 to ICD-11 will likely have an impact on the pharmacy industry and would require NCPDP to update our standards to support the changes in ICD-11. In some instances, the updates would be simply adding a code value to an existing data element, but there are larger considerations regarding the nature of the coding system and associated requirements that would require evaluation such as ensuring our standards and pharmacy industry systems all support an alphanumeric ICD-11 coding scheme and analyzing the impact of special characters used in ICD-11. While providers and health plans will be at the forefront of adoption and deciding appropriate coding, the pharmacy industry and other stakeholders must be prepared for downstream impacts and ensure they can accept, coordinate and meet provider and health plan implementation timelines. To that effect, NCVHS should take into consideration appropriate training to ensure health care professionals, system developers and other stakeholders understand the ICD-11 coding.

As NCVHS moves forward with collecting information and identifying gaps to help inform policy decisions around U.S. adoption and implementation of ICD-11 for morbidity, NCPDP requests NCVHS consider the impact this change would have on the pharmacy industry and provide support to ease the transition. NCPDP thanks NCVHS for consideration of our comments as future ICD-11 policy is considered and looks forward to continuing to serve as a trusted resource.

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



Margaret Weiker
Vice President, Standards Development
NCPDP
standards@ncdpd.org

Respectfully,

A handwritten signature in black ink, which reads 'Lee Ann C. Stember'. The signature is written in a cursive, flowing style.

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