



December 17, 2007

National Committee on Vital and Health Statistics  
Subcommittee on Standards and Security  
Jeff Blair, Chair  
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Harry Reynolds, Chair  
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Denise Buenning  
[Denise.Buenning@cms.hhs.gov](mailto:Denise.Buenning@cms.hhs.gov)

Re: E-Prescribing Standards and the Prescription Drug Program

Dear Jeff, Harry, and Denise;

HHS published an Interim Final Rule on June 23, 2006 (71 FR 36020) updating the adopted NCPDP SCRIPT Standard Implementation Guide, thereby permitting either version 5.0 or 8.1 to be used. The industry is now requesting to be able to move to SCRIPT Standard Implementation Guide Version 10.5. SCRIPT Standard Implementation Guide Version 10.5 supports the functionality of previous versions while supporting additional functionality, including needs identified by the long-term care industry during their participation in the MMA eprescribing pilots. This letter is being sent early in the process, so that timeframes can be established should the subcommittee wish to hear testimony on this request and CMS/HHS build the implementation of NCPDP SCRIPT Standard Implementation Guide Version 10.5 by January 2010 into their schedule. NCPDP SCRIPT Standard Implementation Guide Version 10.5 is currently being balloted among the NCPDP membership and interested parties and it is expected that it will receive approval of the membership, the NCPDP Board of Trustees and ANSI by July 2008.

It is the consensus of the NCPDP membership that CMS must name SCRIPT Standard Implementation Guide Version 10.5 for eprescribing under MMA. CMS is asking in "42 CFR Part 423 Medicare Program; Proposed Standards for E-Prescribing Under Medicare Part D; Proposed Rule, November 16, 2007" whether version 5.0 should be retired. NCPDP membership recommends the retirement of version 5.0, support of version 8.1, and noted this request to move to version 10.5. These comments have been included in the response to the NPRM.

Enhancements made to the SCRIPT Standard Implementation Guide since version 8.1 was published are found in the attached document.

Representatives of the long term care industry will testify at NCVHS in January on removing the exemption from LTC in the MMA eprescribing rule so that all segments of the industry can use the same standard going forward. SCRIPT Standard Implementation Guide Version 10.1 or higher was requested in a letter from long term care industry representatives. SCRIPT Standard Implementation Guide Version 10.5 fits into this request and the long term care industry representatives supported this version modification.

The SCRIPT Standard Implementation Guide Version 10.5 is projected to be approved by July 2008. During industry discussions, January 2010 was recommended for implementation of

SCRIPT Standard Implementation Guide Version 10.5. This allows time for rule making, business planning, development, and testing.

By adopting the NCPDP recommendation, trading partners can move forward with higher versions if the following conditions are met:

- a) Support SCRIPT Standard Implementation Guide Version 8.1 functions until no longer needed by their customers, and
- b) Are able to accept any message based upon SCRIPT Standard Implementation Guide Version 8.1 from a trading partner that has not moved to the new version.

In addition, this recommendation will allow the industry to make progress in testing new functionality while still supporting current standards for eprescribing.

NCPDP stands ready to assist CMS in bringing together industry stakeholders involved in the current eprescribing process for the Medicare Prescription Drug Benefit program. Eprescribing is receiving a lot of attention in the industry, the press, and in Washington, DC.

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

Sincerely,



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cc: Lee Ann Stember, NCPDP President  
cc: NCPDP Board of Trustees

Attachment