surescripts

December 5, 2018

Submitted electronically via:
NCVHSmail@cdc.gov

William W. Stead MD
Chair
National Committee for Vital and Health Statistics
CDC/National Center for Health Statistics
3311 Toledo Road
Hyattsville, Maryland
20782-20002

RE: Predictability Roadmap

Dear Dr. Stead:

We appreciate the opportunity to comment on the National Committee on Vital and Health Statistics' report entitled, "Improving Health Care System Efficiency by Accelerating the Update, Adoption, and Use of Administrative Standards and Operating Rules: A Brief History and Draft Recommendations."

Surescripts operates the nation's largest clinical health information network. Founded in 2001 by pharmacies and pharmacy benefit managers (PBMs) to enable electronic prescribing (e-prescribing), the company has moved beyond that product and today offers a wide portfolio of clinical messaging services. We now serve providers and patients in all 50 states and the District of Columbia and deliver over 700,000 clinical health transactions every hour. Every day, more than 70 percent of all office-based providers use our services on behalf of over 3 million patients. We connect to over 99 percent of all retail pharmacies and most mail order pharmacies in the country, and we delivered over 1.6 billion prescriptions and 1.46 billion medication histories to providers this past year. Our provider directory contains over 1,000,000 prescribers and our Master Patient Index covers nearly 250 million insured lives. Additional information about Surescripts is available at www.surescripts.com, and we particularly call your attention to our National Progress Report available at https://surescripts.com/news-center/national-progress-report-2017/

Although e-Prescribing is not part of the predictability roadmap recommendations, we believe that NCVHS should recommend proposed legislation that would allow the Secretary of Health and Human Services to give NCPDP authority to determine "generally-accepted" e-prescribing standards. The industry should name a baseline version and allow trading partners to test and adopt newer versions so that business needs can be met in a timelier manner.

NCPDP has established a process where the membership will review version changes every November, with the goal of moving to a new version every 3 years, and no less frequently than every 5 years. NCPDP's consensus-based standards development process is already widely respected and accepted by industry stakeholders. NCPDP ensures their membership has all the tools to properly implement standards, including creating implementation guides, best practices, operating rules, code set modifications, and education through white papers, webinars and conferences.

Thank you for the opportunity to share our views on the draft report. Please do not hesitate to contact me with questions or for further information.

Sincerely,

Mary Ann Chaffee