

Office of E-Health Standards and Services

MAR 22 2013

Lee Ann C. Stember
President
National Council for Prescription Drug Programs (NCPDP)
9240 E. Raintree Drive
Scottsdale, Arizona 85260

Dear Ms. Stember

This notice is in response to the National Council for Prescription Drug Programs' (NCPDP's) request for approval of an enhancement to the NCPDP Telecommunication Standard Implementation Guide Version D.0.

In your letter, dated November 15, 2012, you described a problem that relates to the misinterpretation of partial "fills" and refills of Schedule II controlled substances, and the fact that the NCPDP D.0 standard permits the use of the Fill Number (403-D3) Field to represent fill number, and not necessarily refill number. This use has created a misinterpretation of the number of Schedule II controlled substances that are being re-filled, as opposed to partially filled.

The Centers for Medicare & Medicaid Services (CMS) approves your recommended resolution to allow the conditional use of the NCPDP D.0 standard Quantity Prescribed (460-ET) Field which currently is not in use in the claim transaction. Allowing the use of this field will communicate the actual quantity prescribed in the transmission of a claim, and would validate whether or not there are inappropriate prescription fills in excess of the quantity prescribed.

CMS also approves following NCPDP recommended actions for implementing the change and communicating it to the industry:

- NCPDP requests OESS publish a notice by December 31, 2012 regarding approval of the use of the requested field, and CMS expects to publish such notice in the near future.
- NCPDP will republish the Telecommunication Standard Implementation Guide Version D.0, with an explanation in the "Editorial Corrections" section.

- NCPDP would also publish this change in the Version D Editorial Document, which is a publicly available document containing editorial corrections, clarifications, and frequently asked questions.
- Notification of the updated documents would be sent to all members (anyone that has purchased the Telecommunication Standard Implementation Guide Version D.Ø is considered a member).

Thank you for your prompt attention to this issue.

Sincerely,

A handwritten signature in blue ink that reads "Denise M. Buenning". The signature is written in a cursive style with a large, stylized initial 'D'.

Denise M. Buenning, MSM
Deputy Director,
Office of E-Health Standards and Services