

June 21, 2013

Honorable Kathleen Sebelius  
Secretary, Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

**Re: Enhancements to NCPDP Standard for Pharmacy Claims**

Dear Madam Secretary,

On November 15, 2012, the National Committee on Vital and Health Statistics (NCVHS) received a letter from the National Council for Prescription Drug Programs (NCPDP) notifying us about a recommendation that NCPDP submitted to the CMS Office of eHealth Standards and Services regarding an enhancement to the NCPDP Telecommunication Implementation Guide Version D.0.

The recommendation was to allow the Telecommunication Standard Implementation Guide Version D.0 to specify the **conditional use** of the field “Quantity Prescribed” (field # 460-ET), which is currently not in use in the pharmacy claim transaction, **to communicate the actual quantity prescribed** by the provider. This data will be available to validate whether or not there are inappropriate fills in excess of the quantity prescribed, a concern raised in a September, 2012 report from the HHS Office of the Inspector General (report # OEI-02-09-00605).

CMS approved on March, 2013 the NCPDP recommendation and action plan, which included republishing the Telecommunication Standard Implementation Guide Version D.0, with an explanation in the “Editorial Corrections” section, publishing the change in the Version D Editorial Document, and notifying of the update to the industry.

We want to take this opportunity to inform the Secretary that NCVHS is in agreement with the recommended correction to the adopted standards for pharmacy claims and the action plan as recommended by NCPDP, and supports CMS decision to approve this change.

Sincerely,

/s/

Larry A. Green, M.D. Chairperson,  
National Committee on Vital and Health Statistics

Cc: HHS Data Council Co-Chairs