



Via Electronic Submission to: <https://www.healthit.gov/isa/isa-document-table-contents>

October 2, 2023

Office of the National Coordinator
Department of Health and Human Services
Hubert H. Humphrey Bldg., Suite 729D
200 Independence Ave., SW
Washington, DC 20201

Re: 2024 Interoperability Standards Advisory Reference Edition

To Whom it May Concern:

On behalf of its membership, the Pharmacy Health Information Technology Collaborative (PHIT) is pleased to submit comments for *2024 Interoperability Standards Advisory Reference Edition*. PHIT is supportive of the ONC proposed standards for clinical health IT interoperability purposes and fully supports the recommendations being made by the National Council of Prescription Drug Programs (NCPDP). PHIT has been involved with the federal agencies, including the Department of Health and Human Services (HHS) Office of the National Coordinator (ONC) and the Centers for Medicare & Medicaid Services (CMS), in developing the national health information technology (HIT) framework for implementing secure access of electronic health information to improve health outcomes since 2010.

Pharmacists provide essential, patient-centered care services to their patients, including Medicare and Medicaid beneficiaries. Pharmacists are users of health IT and are particularly supportive of interoperability standards incorporating HL7 FHIR, C-CDA on FHIR Care Plan, FHIR US Core; SNOMED CT, LOINC, RxNorm, NCPDP SCRIPT Standard Implementation Guides, NCPDP Real Time Prescription Benefit Standard, and NCPDP Telecommunication Standard Implementation Guide, etc.

PHIT supports use of these particular standards, which are important to pharmacists for documenting allergies (including medications, food, and environmental intolerances and reactions), immunizations (historical and administered), immunization registry reporting (query/response), medications, medication allergies, patient problems, smoking status, reporting to public health agencies, clinical decision support services/knowledge artifacts, drug formulary checking, and electronic prescribing (including new versions).

Section I: Vocabulary/Code Set/Terminology

Emergency Medical Services

Representing Health Care Data for Emergency Medical Services

PHIT supports NCPDP's recommendation that NDC should be added as a value for use when emergency medication is being administered, NDC be used. This request was also made for the 2023 Edition.

Social, Psychological, and Behavioral Data

Representing Social Determinants of Health - Conditions and Diagnoses

PHIT supports ONC's recommendation for using SNOMED CT U.S. Edition and ICD-10-CM to represent SDOH conditions and diagnoses. PHIT also recommends reviewing NCPDP's white paper, "Collecting and Exchanging Social Determinants of Health Data in Pharmacy," which was produced to assist in the usage of these codes within NCPDP SCRIPT and Telecommunications Standards and the [Pharmacist eCare Plan](#).

Section II: Content/Structure

Admission, Discharge, and Transfer

Sending a Notification of a Long-Term Care Patient's Admission, Discharge and/or Transfer Status to the Servicing Pharmacy

PHIT supports NCPDP's recommendation to add NCPDP Specialized Standard, Implementation Guide, Version 2023011 to the standard type.

Patient Preference/Consent

Recording Patient Preferences for Electronic Consent to Access and/or Share their Health Information with Other Care Providers

PHIT supports NCPDP's recommendation to create a new distinct category from the existing electronic consent for patient preference: Obtaining patient or provider authorization/consent related to a specific medication fulfillment. . As NCPDP notes, the goal of the new category is to obtain authorization from an individual medication and not to designate a preference for other medications.

Pharmacy Interoperability

Allows Pharmacy Benefit Payers to Communicate Formulary and Benefit Information to Prescriber Systems

PHIT supports NCPDP's recommendation to remove NCPDP Formulary and Benefit Standard Version(s) 53, 54, and 55.

Allows a Pharmacy to Notify a Prescriber of Prescription Fill Status

PHIT supports NCPDP's recommendation to sunset NCPDP SCRIPT Standard, Implementation Guide, Version 10.6.

[Allows a Pharmacy to Request Additional Refills](#)

PHIT supports NCPDP's recommendation to sunset NCPDP SCRIPT Standard, Implementation Guide, Version 10.6, as well as sunsetting language around DeniedNewPrescriptionToFollow in the Limitations, Dependencies, and Preconditions for Consideration section.

[Allows a Pharmacy to Request a Change to a Prescription](#)

PHIT supports NCPDP's recommendation to sunset NCPDP SCRIPT Standard, Implementation Guide, Version 10.6.

[Allows a Pharmacy to Request, Respond to, or Confirm a Prescription Transfer](#)

PHIT supports NCPDP's recommendation to sunset NCPDP SCRIPT Standard, Implementation Guide, Version 2013101.

[Allows a Prescriber or a Pharmacy to Request a Patient's Medication History](#)

PHIT supports NCPDP's recommendation to sunset NCPDP SCRIPT Standard, Implementation Guide, Version 10.6.

[Allows a Prescriber to Cancel a Prescription](#)

PHIT supports NCPDP's recommendation to sunset NCPDP SCRIPT Standard, Implementation Guide, Version 10.6.

[Allows a Prescriber to Prescribe Medication Using Weight-Based Dosing](#)

PHIT supports NCPDP's recommendation to update Structured and Codified Sig Format Implementation Guide Version 2.1 to Structured and Codified Sig Format Implementation Guide Version 2.2.

[Allows a Prescriber to Request a Patient's Medication History from a State Prescription Drug Monitoring Program \(PDMP\)](#)

PHIT supports NCPDP's recommendation to add NCPDP SCRIPT Standard, Implementation Guide, Version 2022011.

[Allows a Prescriber to Request, Cancel or Appeal Prior Authorization for Medications](#)

PHIT supports NCPDP's recommendation updating NCPDP SCRIPT Standard, Implementation Guide, Version 2017071 to Federally Required; update NCPDP Formulary and Benefits Standard, Version 3 to Federally Required with an adoption level of 4; sunsetting NCPDP Formulary and Benefit Standard Versions 53, 54, and 55; and adding NCPDP Formulary and Benefit Standard Version 60.

[Allows a Prescriber to Send a Prescription to a Pharmacy for a Controlled Substance](#)

PHIT supports NCPDP's recommendation to add NCPDP SCRIPT Standard, Implementation Guide, Version 2022011 to Federally Required.

[Allows for the Exchange of State Prescription Drug Monitoring Program \(PDMP\) Data](#)

PHIT supports NCPDP's recommendation to update NCPDP Prescription Drug Monitoring Programs Reporting Standard, Implementation Guide to Version 15; updating NCPDP

Telecommunication Standard, Version D to NCPDP Telecommunication Standard, Version D.0.

Summary Care Record

Support a Transition of Care or Referral to Another Health Care Provider

PHIT supports NCPDP's recommendation adding NCPDP SCRIPT Standard, Implementation Guide, Version 2022011 to the implementation specification.

Unique Device Identification

Transmitting a Unique Device Identifier

PHIT supports NCPDP's recommendation adding NCPDP SCRIPT Standard, Implementation Guide, Version 2022011 to the implementation specification.

Section III: Services/Exchanges

"Push" Exchange

An Unsolicited "Push" of Clinical Health Information to a Known Destination and Information System User

PHIT supports the following NCPDP recommendations: adding NCPDP SCRIPT Standard, Implementation Guide, Version 2022011 to the implementation specification; updating Specialty Medication Enrollment HL7 FHIR Type to implementation specification, Standards Process Maturity to final, and implementation maturity to production.

An Unsolicited "Push" of Clinical Health Information to a Known Destination Between Systems

PHIT supports NCPDP's recommendation adding NCPDP SCRIPT Standard, Implementation Guide, Version 2022011 to the implementation specification.

Section IV: Administrative

Administrative Transactions - Non-Claims

Health Care Eligibility Benefit Inquiry and Response

PHIT supports NCPDP's recommendation to add NCPDP Real-Time Prescription Benefit Standard Version 12 to the implementation specification.

Administrative Transactions to Support Clinical Care

Health Care Attachments to Support Claims, Referrals and Authorizations

PHIT supports NCPDP's recommendation adding NCPDP SCRIPT Standard, Implementation Guide, Version 2022011 to the implementation specification.

Health Care Claims and Coordination of Benefits

Health Care Claims or Equivalent Encounter Information for Retail Pharmacy Claims

PHIT supports the following NCPDP recommendations: updating NCPDP Telecommunication Standard, Implementation Guide, Version F2, March 2018 and Equivalent Batch Standard Implementation Guide, Version 15 to NCPDP Telecommunication Standard, Implementation Guide, Version F6, April 2022 and

Equivalent Batch Standard Implementation Guide, Version 15; updating NCPDP Batch Standard Medicaid Subrogation Implementation Guide, Version 3, Release 0 (Version 3.0), July 2007 to NCPDP Batch Standard Medicaid Subrogation Implementation Guide Version 3.0; and updating NCPDP Batch Standard Medicaid Subrogation Implementation Guide, Version 10 to NCPDP Batch Standard Subrogation Implementation Guide Version 10.

[Health Care Claims or Equivalent Encounter Information for Retail Pharmacy Supplies and Professional Services](#)

PHIT supports the following NCPDP recommendations: updating NCPDP Telecommunication Standard, Implementation Guide, Version F2, March 2018 and Equivalent Batch Standard Implementation Guide, Version 15 to NCPDP Telecommunication Standard, Implementation Guide, Version F6, April 2022 and Equivalent Batch Standard Implementation Guide, Version 15; updating NCPDP Batch Standard Medicaid Subrogation Implementation Guide, Version 3, Release 0 (Version 3.0), July 2007 to NCPDP Batch Standard Medicaid Subrogation Implementation Guide Version 3.0; and updating NCPDP Batch Standard Medicaid Subrogation Implementation Guide, Version 10 to NCPDP Batch Standard Subrogation Implementation Guide Version 10.

[Operating Rules to Support Administrative Transactions](#)

[CAQH® CORE Operating Rules for Prior Authorization and Referrals](#)

PHIT supports NCPDP's recommendation adding NCPDP SCRIPT Standard, Implementation Guide, Version 2022011 to the implementation specification.

[Connectivity for Operating Rules](#)

PHIT supports NCPDP's recommendation adding Operating Rule Connectivity, V2.0 to operating rules.

[Operating Rules for Claims](#)

PHIT supports NCPDP's recommendation to add NCPDP Telecommunication Standard, Version D to NCPDP Telecommunication Standard, Version D.0 and NCPDP Telecommunication Standard, Implementation Guide, Version F6 to implementation specification.

The Pharmacy HIT Collaborative comprises the major national pharmacy associations, representing 250,000 members, including those in pharmacy education and accreditation. PHIT's membership is composed of the key national pharmacy associations involved in health IT, the National Council for Prescription Drug Programs, and 13 associate members encompassing e-prescribing, health information networks, transaction processing networks, pharmacy companies, system vendors, pharmaceutical manufacturers, and other organizations that support pharmacists' services.

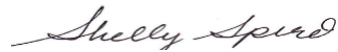
As the leading authority in pharmacy health information technology, PHIT's vision and mission are to ensure the U.S. health IT infrastructure better enables pharmacists to optimize

person-centered care. Supporting and advancing the use, usability, and interoperability of health IT by pharmacists for person-centered care, PHIT identifies and voices the health IT needs of pharmacists; promotes awareness of functionality and pharmacists' use of health IT; provides resources, guidance, and support for the adoption and implementation of standards-driven health IT; and guides health IT standards development to address pharmacists' needs. For additional information, visit www.pharmacyhit.org.

On behalf of PHIT, thank you again for the opportunity to comment on *2024 Interoperability Standards Advisory Reference Edition*.

For more information, contact Shelly Spiro, executive director, Pharmacy HIT Collaborative, at shelly@pharmacyhit.org.

Respectfully submitted,



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