



Via Electronic Submission to: <http://www.regulations.gov>

August 16, 2019

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-4189-P  
7500 Security Boulevard  
Baltimore, MD 21244-1850

**Re: CMS-4189-P: Medicare Program; Secure Electronic Prior Authorization for Medicare Part D**

Dear Administrator Verma:

On behalf of the membership of the Pharmacy Health Information Technology Collaborative (Collaborative), we appreciate the opportunity to submit comments on the proposed rule *CMS-4189-P: Medicare Program; Secure Electronic Prior Authorization for Medicare Part D*.

Pharmacists provide essential pharmacy and health-related services to patients. Additionally, pharmacists are users of health IT, and in particular, e-prescription and EHR systems. The Collaborative supports the use of these systems, which are important to pharmacists in working with other health care providers to provide needed medications and transmit patient information related to overall patient care, transitions of care, immunization (historical and administered), immunization registry reporting, medication lists, medication allergies, allergy reactions, patient problem lists, smoking status, reporting to public health agencies, clinical decision support services/knowledge artifacts, drug formulary checking, and electronic prescribing.

The Collaborative has been involved with the federal agencies, including the Office of the National Coordinator (ONC) and the Centers for Medicaid and Medicare Services (CMS) in developing the national health information technology (HIT) framework and standards since 2010.

## II. Proposed Adoption of the NCPD SCRIPT Standard Version 2017071 as the Part D ePA Transaction for Part D Program

### B. PA for Part D E-Prescribing

The Collaborative supports adopting the NCPDP SCRIPT version 201701 standard for the Part D ePA transaction of the Part D program. While the proposed rule requires adoption beginning January 1, 2021, we encourage CMS to ensure industry is provided enough time for adoption.

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

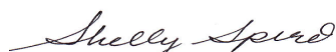
As the leading authority in pharmacy health information technology, the Pharmacy HIT Collaborative's vision and mission are to ensure the U.S. health IT infrastructure better enables pharmacists to optimize person-center care. Supporting and advancing the use, usability, and interoperability of health IT by pharmacists for person-centered care, the Collaborative 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](http://www.pharmacyhit.org).

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On behalf of the Pharmacy HIT Collaborative, thank you again for the opportunity to comment on *CMS-4189-P: Medicare Program; Secure Electronic Prior Authorization for Medicare Part D*.

For more information, contact Shelly Spiro, executive director, Pharmacy HIT Collaborative, at [shelly@pharmacyhit.org](mailto:shelly@pharmacyhit.org).

Respectfully submitted,



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