



August 22, 2011

Department of Health and Human Services  
Office of the National Coordinator for Health Information Technology  
200 Independence Ave, SW  
Room 729D  
Washington, DC 20201  
Attention: Judith Sparrow  
Judy.Sparrow@hhs.gov

RE: HIT Standards Committee and discussion of 07/20/2011

Dear HIT Standards Committee;

The National Council for Prescription Drug Programs (NCPDP) is offering the following comments and background as a result of a discussion of the HITSC on July 20, 2011 on the use of RxNorm in discharge prescriptions. A brief summary of the HITSC discussion was presented at the recent meeting of the NCPDP ePrescribing and Related Transactions Work Group and the attendees recommended that comments be submitted.

In 2009, NCPDP convened an industry task group to analyze the use of RxNorm codes in the NCPDP standards. The electronic prescribing industry recommended when exchanging a codified concept for *the prescribed medication*, that the RxNorm vocabulary be used as appropriate based on the prescriber's intent using the four term types.

- RxNorm Semantic Clinical Drug
- RxNorm Semantic Branded Drug
- RxNorm Generic Package
- RxNorm Branded Package

As the standards use a code field and a qualifier field, the following qualifiers were added for consistent use.

- SCD - RxNorm Semantic Clinical Drug
- SBD - RxNorm Semantic Branded Drug
- GPK - RxNorm Generic Package
- BPK - RxNorm Branded Package

In 2010, the recommendations were approved, balloted, and published in the NCPDP SCRIPT Standard, the Formulary and Benefit Standard, and other NCPDP standards. Industry guidance was created to assist implementers with the use of RxNorm in the NCPDP SCRIPT Standard. The NCPDP SCRIPT Standard, as named in the Medicare Modernization Act, is the standard used for electronic prescribing in settings other than inpatient. The industry is using the RxNorm codes for prescribing and in preparation for achieving Meaningful Use compliance. A CMS-commissioned RAND study in 2011<sup>1</sup> states:

*"Based on the study results, the RAND team recommends that RxNorm be adopted as the primary drug identifier in e-prescribing systems. Doing so would eliminate one of the major barriers to successful e-prescribing and enable e-prescribing systems to provide*

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<sup>1</sup> Bell DS , O'Neill SM , Reynolds KA, and Schoeff D, *Evaluation of RxNorm in Ambulatory Electronic Prescribing*, Santa Monica, Calif.: RAND Corporation, TR -941-CMS , 2011. [http://www.rand.org/pubs/technical\\_reports/TR\\_941.html](http://www.rand.org/pubs/technical_reports/TR_941.html)

*other benefits, including more-comprehensive information about drug costs and more-accurate inventories of the drugs that a patient is taking.”*

Based on the HITSC discussion, NCPDP believes a clarification to a discharge prescription needs to be made. A discharge prescription is not an inpatient order but rather a prescription to be filled by an ambulatory pharmacy. A discharge prescription is to follow the legal prescription requirements of each state.

### **NABP Model State Pharmacy Act and Model Rules**

*National Association of Boards of Pharmacy Model State Pharmacy Act and Model Rules (“The Model Act”)<sup>1</sup>*

#### **Section 3. Pharmacy Practice.**

- (a) *Prescription Drug Order*  
*A Prescription Drug Order shall contain the following information at a minimum:*
- (1) *full name and street address of the patient;*
  - (2) *name, address, and, if required by law or rules of the Board, DEA registration number of the prescribing Practitioner;*
  - (3) *date of issuance;*
  - (4) ***name, strength, dosage form, and quantity of Drug prescribed (emphasis added);***
  - (5) *directions for use;*
  - (6) *refills authorized, if any;*
  - (7) *if a written Prescription Drug Order, prescribing Practitioner’s signature;*
  - (8) *if an electronically transmitted Prescription Drug Order, prescribing Practitioner’s electronic or digital signature;*
  - (9) *if a hard copy Prescription Drug Order generated from electronic media, prescribing Practitioner’s electronic or manual signature. For those with electronic signatures, such Prescription Drug Orders shall be applied to paper that utilizes security features that will ensure the Prescription Drug Order is not subject to any form of copying and/or alteration.*

RxNorm term types SCD, BCD, GPK and BPK are composed of medication name + strength + dosage form and are particularly suited to address NABP Model §3(a)(4).

At the end of the discussion of the HITSC on July 20, 2011, the team was advised to remove reference to the four types and reference RxNorm only. NCPDP believes that RxNorm, and specifically SCD, SBD, GPK and BPK, should be the recommendation for prescribed medication identification in discharge prescriptions in line with previous HITSC recommendations from the Vocabulary Task Force (05/18/2011).

If, based on future industry experience, additional RxNorm types need to be added to support electronic prescribing, NCPDP will work with the industry to facilitate the incorporation of such types into the applicable standards.

NCPDP is a not-for-profit ANSI-accredited Standards Development Organization consisting of more than 1,600 members who represent drug manufacturers, chain and independent pharmacies, drug wholesalers, insurers, mail order prescription drug companies, claims processors, pharmacy benefit managers, physician services organizations, prescription drug

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<sup>1</sup> <http://www.nabp.net/ftpfiles/NABP01/ModelActFINAL.doc>

providers, software vendors, telecommunication vendors, service organizations, government agencies and other parties interested in electronic standardization within the pharmacy services sector of the health care industry.

NCPDP has developed standards that have been used in healthcare exchanges for over 30 years. NCPDP is committed to furthering the electronic exchange of information between healthcare stakeholders. NCPDP standards are the standards used for eligibility, claims processing, reporting, rebates, a standard ID Card, and other functions in the pharmacy services industry. The NCPDP SCRIPT Standard and the Formulary and Benefit Standard are the standards in use in electronic prescribing.

Thank you for the opportunity to submit comments.

Sincerely,  
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