



August 16, 2019

Ms. Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-4819-P  
7500 Security Boulevard  
Baltimore, MD 21244-1850

***Re: Medicare Program; Secure Electronic Prior Authorization for Medicare Part D [RIN 0955-AA01]***

Dear Administrator Verma:

The Academy of Managed Care Pharmacy (AMCP) thanks the Centers for Medicare and Medicaid Services (CMS) for the opportunity to provide comments in response to its proposed rule, "[Medicare Program; Secure Electronic Prior Authorization for Medicare Part D \[CMS-4819-P\]](#)" published in the Federal Register on June 19, 2019. Prior Authorization (PA) is an effective method to ensure that drug benefits are administered as they have been designed, and that patients receive the medication therapy that they need. The adoption of electronic PA (ePA) allows for secure, electronic transmission of patient information in real time, therefore, decreasing the administrative burden for prescribers and managed care organizations and improving the turnaround time for the benefit of patients.<sup>1</sup>

AMCP is the nation's leading professional association dedicated to increasing patient access to affordable medicines, improving health outcomes and ensuring the wise use of healthcare dollars. Through evidence- and value-based strategies and practices, the Academy's 8,000 pharmacists, physicians, nurses and other practitioners manage medication therapies for the 270 million Americans served by health plans, pharmacy benefit management firms, emerging care models and government.

PA is a critical utilization management tool in the pharmacy benefit space. While AMCP strongly believes in this utilization management tool, we recognize that more can be done to improve the PA process. Previously, AMCP submitted comments to CMS supporting the move from the current required NCPDP SCRIPT standard, Implementation Guide Version 10.6 to requiring prescribers and dispensers to use NCPDP SCRIPT standard, Implementation Guide Version 2017071, beginning

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<sup>1</sup> Prior Authorization and Utilization Management Concepts in Managed Care Pharmacy. Journal of Managed Care & Specialty Pharmacy. 2019; 25(6):641-44. Available at: <https://www.jmcp.org/doi/pdf/10.18553/jmcp.2019.19069>. Accessed on August 5, 2019.

January 1, 2020.<sup>2</sup> Version 2017071 contains ePA transactions, as well as transactions for new prescription requests, transfers, and Risk Evaluation and Mitigation Strategy (REMS) requests and responses.<sup>3</sup>

In its proposal, CMS would require the adoption of the NCPD SCRIPT Standard Version 2017071 as the Part D ePA transaction for the Part D Program. AMCP supports adopting the NCPDP SCRIPT version 201701 standard for the Part D ePA transaction of the Part D program beginning January 1, 2021. Updating the standards for electronic prescribing will improve efficiency and decrease burden by streamlining the PA process and enabling real time PA completion.

As a member of the Pharmacy Health Information Technology Collaborative (Collaborative)<sup>4</sup> AMCP also supports its comment submission. The Collaborative comprises the major national pharmacy associations, representing 250,000 members, including those in pharmacy education and accreditation. As the leading authority in pharmacy health information technology, the Collaborative's vision and mission are to ensure the U.S. health IT infrastructure better enables pharmacists to optimize person-center care.

## Conclusion

AMCP appreciates the opportunity to comment on CMS 4819-P: Medicare Program; Secure Electronic Prior Authorization for Medicare Part D. If you have any questions regarding AMCP's comments or would like further information, please contact me at 703-684-2600 or [scantrell@amcp.org](mailto:scantrell@amcp.org).

Sincerely,



Susan A. Cantrell, RPh, CAE  
Chief Executive Officer

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<sup>2</sup> AMCP. Available at: <https://www.amcp.org/sites/default/files/2019-03/AMCP%20Submits%20Comments%20to%20CMS%20on%20Modernizing%20Part%20D%20and%20Medicare%20Advantage%20to%20Lower%20Drug%20Prices%20and%20Reduce%20Out-of-Pocket%20Expenses%20proposed%20rulemaking.pdf>. Accessed on August 5, 2019.

<sup>3</sup> National Council for Prescription Drug Programs. NCPDP SCRIPT Version 2017071 ePrescribing Testing Tool Now Available. September 13, 2018. Available at: <http://www.ncdp.org/NCPDP/media/pdf/pressrelease/SCRIPTv-2017071Testing-Tool-Now-Available-091318.pdf>. Accessed May 24, 2019.

<sup>4</sup> Pharmacy Health Information Technology Collaborative. Available at: <https://www.pharmacyhit.org/>. Accessed on August 5, 2019.