



Transaction Policy Advisory Group

Comments on the Health Insurance Reform: Modifications to Standards for Electronic Transactions and Code Sets (CMS-0003-P)

June 11, 2002

Please Note: These comments represent a summary of the industry attendee's and member's discussions and recommendations. The WEDI Board of Directors has not reviewed them. This review will occur the week of June 27, 2002. A final report of the board-approved recommendations to the Secretary of HHS will be published as appropriate.

Health Insurance Reform: Modifications to Standards for Electronic Transactions and Code Sets (CMS-0003-P)

Section Code	Issue	Comment	Page	Col.
162.1002	Code Sets		38050	1
Section II. Provisions of the Proposed Regulations B. Medical Data Code Set for Drugs and Biologics	Comments regarding alternative code sets under consideration.	Wedi does not recommend that a standard code set be named for drugs and biologics for other than retail pharmacy claims at this time. Wedi does recommend that the current usage remain constant (e.g., no expansion of the use of NDC codes for reporting drugs and biologics in the institutional and professional transactions until an appropriate single code set is developed.) Approved - Unanimously	38048	2
162.1102-162.1802	Adoption of NCPDP Standards	Wedi agrees with the selection of NCPDP standards for eligibility, referral certification, authorization, and coordination of benefits. Wedi also agrees with the selection of ASC X12N 835 for Health Care Payment and Remittance Advice for Retail Pharmacy. Approved-Unanimously	38050	2-3

Section Code	Issue	Comment	Page	Col.
Summary:	Adoption of NCPDP Standards for health care claims or equivalent encounter information	<p>Wedi is requesting that the Final Rule for Transactions and Code Sets be modified to include the NCPDP Standards for the continuation of the billing of supplies. Wedi recommends the following: "The billing of supplies from retail pharmacies should be permitted using the NCPDP Telecommunication Standard Version 5.1 or Batch Standard Version 1.1 or the ASC X12 837 under HIPAA.</p> <p>The determination of which standard to be used would be determined by the health plan.</p> <p>When supplies are billed by the dispensing retail pharmacy the standard/Implementation Guides would define the use of the code sets. Wedi also recommends the retraction of HCPCS coding system as the standard for supplies in the retail pharmacy transactions (e.g., the standards/guides would define which of the two code sets should be used).</p> <p>Wedi believes these changes must be made and are necessary for compliance. Approved-Unanimously</p>	38044	3
Section III. Collection of Information Requirements	Paperwork Reduction Act	Wedi believes that the proposed rule to exchange certain information does not constitute information collection subject to the PRA. Approved-Unanimously	38048	3