



## Proposed Part D e-Prescribing Transaction Standard

CMS just issued a new proposed Part D rule, which would create a new transaction standard for Part D e-prescribing and prior authorization request and response transmissions (or “ePA transaction standard”).

- Part D plan sponsors would be required to support version 2017071 of the National Council for Prescription Drug Programs (NCPDP) SCRIPT standard, which became effective June 15, 2018.
  - The ePA transaction standard would allow a provider with an e-prescribing system (or EHR with eRx capability) to determine whether a patient’s Part D plan requires a PA and to submit the information required to fulfill the terms of the PA in real-time. Part D plans would be required to support the ePA transaction standard beginning on January 1, 2021.
  - Notably, the May 2019 Part D Final Rule requires Part D plans to implement by January 1, 2021 a real-time benefit tool (RTBT), which must be able to: (1) integrate with at least one prescriber’s electronic prescribing system or electronic health record and (2) provide complete, accurate, timely and clinically appropriate patient-specific real-time formulary and benefit
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information (including cost, formulary alternatives and utilization management requirements).

If implemented, the ePA transaction standard and RTBT would bring additional visibility to formulary design and drug pricing and provide more tools to allow prescribers to ensure their patients have access to the most appropriate and affordable medication at the time of prescribing.

Part D plan sponsors and their pharmacy benefit managers should evaluate what would be involved in implementing the proposed standard and consider submitting comments to CMS by the August 16, 2019 deadline. The Proposed Rule is available at: <https://www.federalregister.gov/documents/2019/06/19/2019-13028/medicare-program-secure-electronic-prior-authorization-for-medicare-part-d>

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