



July 3, 2007



Lee Ann Stember
President

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Department of Health and Human Services
Centers for Medicare and Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development – C
Attention: Bonnie L. Harkless
Room C4-25-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Ms. Harkless:

The National Council for Prescription Drug Programs (NCPDP) wishes to comment on the CMS extension of a currently approved collection: Medicare Enrollment Application: Form Number CMS-855 (OMB#:0938-0685) as published in the Federal Register Volume 72, No. 91 Friday, May 11, 2007 page 26819.

The Section 17: Supporting Documents requirement that providers submit a copy of their NPI notification received from the CMS National Plan and Provider Enumeration System (NPPES) should be eliminated.

The CMS Program Integrity Group's NPPES system enumerates providers with their NPIs. CMS indicated that a copy of the notification was necessary for Fiscal Intermediaries because there was no other way these entities could verify the provider's NPI. There was not yet access to NPIs through other means. Since that requirement was implemented in May 2006, the need to submit a paper copy of the NPI notification has been a significant burden for providers.

Nowhere has the burden been greater than for providers who authorized Electronic File Interchange Organizations (EFIOs) to obtain NPIs on their behalf. For many large teaching hospitals and virtually every pharmacy chain, EFIO is the only economical manner in which to obtain NPIs and to update NPPES. These providers do not receive a notification from NPPES as Section 17 states. They receive notification of their NPI from the EFIO in a variety of formats. The estimated burden for these providers to provide paper proof of the proper NPI to a variety of Fiscal Intermediaries was clearly underestimated.

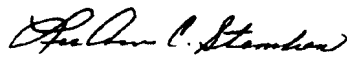
The NPI Dissemination Notice was published in the Federal Register on May 30, 2007. CMS/PIG has stated that the NPI Registry will be on line and available to

Ms. Bonnie L. Harkless
July 3, 2007
Page Two

the public on August 1, 2007. Deleting this unnecessary requirement and utilizing the free NPI Registry or the free NPPES downloadable file available from CMS eliminates the need for a paper copy of an NPI notification to verify provider NPIs. Use of this technology will help to minimize the information collection burden to providers.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Ann C. Stember".

Lee Ann C. Stember
President
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cc: NCPDP Board of Trustees



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

#3

July 9, 2007

Department of Health and Human Services
Centers for Medicare and Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development – C
Attention: Bonnie L. Harkless
Room C4-25-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Ms. Harkless:

Re: Medicare Enrollment Application: Form Number CMS-855 (OMB#:0938-0685)

413 North Lee Street
P.O. Box 1417-D49
Alexandria, Virginia
22313-1480

Regarding Section 17 of the Medicare Enrollment Application: Form Number CMS-855 “CMS 855,” we request elimination of the requirement that providers submit a copy of the NPI enumeration notification they received from the CMS National Plan and Provider Enumeration System (NPPES).

The National Association of Chain Drug Stores (NACDS) represents the nation’s leading retail chain pharmacies and suppliers, helping them better meet the changing needs of their patients and customers. Chain pharmacies operate more than 37,000 pharmacies, employ 114,000 pharmacists, fill more than 2.3 billion prescriptions yearly, and have annual sales of nearly \$700 billion.

Pharmacies have been required to submit a copy of their NPI enumeration notification when submitting a CMS 855 application because, presumably, there has been no other way for the various fiscal intermediaries who process the CMS 855 applications to verify the pharmacy’s NPI. Since CMS implemented that requirement in May 2006, the need to submit a paper copy of the NPI notification has been a significant burden for pharmacies.

This burden has been the greatest for pharmacies that have authorized Electronic File Interchange Organizations (EFIOs) to obtain NPIs on their behalf. For almost every pharmacy chain, utilizing an EFIO is the only economical manner to obtain NPIs and to update NPPES. These pharmacies do not receive a notification from NPPES in a letter format with the provider NPI. Instead they receive notification of their NPI from the EFIO in a spreadsheet.

A special process was established for CMS 855 applications with the help of Pat Peyton at CMS and the EFIO whereby the pharmacy must take the spreadsheet and “cut and paste” the row that contains the particular store information into a letter. This letter outlines the store detail for the application process and mimics the original notification

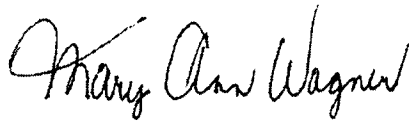
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letter from CMS. However, this approved process often causes delays because the fiscal intermediaries are not always familiar with this EFIO process and the “cut and paste” letter. The fiscal intermediaries frequently return the CMS 855 applications to pharmacies, thus causing pharmacies to experience needless delays.

We request that CMS eliminate this burdensome paper process now that an electronic solution is available. The NPI Dissemination Notice was published in the Federal Register on May 30, 2007. CMS has stated that the NPI Registry will be available to the public on August 1, 2007. Fiscal intermediaries will have access to these files and will be able to verify providers’ NPIs in this manner.

We appreciate your consideration of our comments on this issue.

Sincerely,

A handwritten signature in black ink that reads "Mary Ann Wagner". The signature is written in a cursive, flowing style.

Mary Ann Wagner
Senior Vice President, Policy and Pharmacy Regulatory Affairs