



Caryn Schulsinger
Manager
Medicare Compliance

Medco Health Solutions, Inc.
100 Parsons Pond Drive
Franklin Lakes, NJ 07417

tel 201-269-4160
fax 201-269-1008

#5

December 8, 2008

CMS, Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development - C
Attention: Bonnie L. Harkless
Room C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Dear Ms. Harkless,

In response to the request for comment on the CY2010 Plan Benefit Package (PBP) and Formulary Submission, Medco Health Solutions respectfully submits the following:

- 1) Regarding the implementation of Rxnorm as a replacement for the proxy NDCs, we offer that the data vendor (First Data Bank) cannot currently support and does not have plans to support Rxnorm in the near future. In further research with other vendors, we receive the same response. The industry does not appear ready to support the change to Rxnorm. Will there be any reconsideration of Rxnorm based on the lack of industry readiness?
- 2) With regards to pricing files within Medco, extensive development will be required to cross-walk Rxnorm to a Medco NDC. Is it possible for CMS to provide the pricing file requirements for 2010 by January 2009 in order that we can begin the development process and be ready for 2010?
- 3) CMS has provided the requirement that quantity limits be expressed as 31 day supply. Does this preclude plans from offering a benefit with anything other than 31 days (i.e. 34 days, 30 days, etc.)?

Thank you.

Caryn Schulsinger
Manager, Medicare Compliance

