



## **CENTER FOR MEDICARE**

---

**DATE:** May 09, 2018

**TO:** All Part D Plans

**FROM:** Amy Larrick Chavez-Valdez  
Director, Medicare Drug Benefit and C&D Data Group

**SUBJECT:** Implementation of the Updated SCRIPT Standard

The Centers for Medicare & Medicaid Services (CMS) recently codified in rule (CMS-4182-F) adoption of a new NCDPD SCRIPT Standard Version 2017071(2017071) and retirement of current NCPDP SCRIPT Version 10.6 (10.6) for use in the Medicare Prescription Drug Benefit Program (Part D) program effective January 1, 2020. Since publication of the final rule on April 16, 2018 stakeholders have supported the update, but have also expressed concerns related to the implementation of the new standard. CMS is issuing this memorandum in response to those concerns.

*Transition Period* - Stakeholders have expressed concern that the final rule did not respond to the industry's request for a phased-in period allowing plans to gradually convert their systems from 10.6 to 2017071. CMS concurs that a phased-in period is generally the preferred approach when migrating from one electronic standard version to another. However, because 2017071 is not backwards compatible to 10.6, this was not a feasible option. CMS has previously defined the term "backwards compatible" to mean "that the newer version would retain, at a minimum, the full functionality of the version previously adopted in regulation, and would permit the successful completion of the applicable transaction with entities that continue to use the previous version,"<sup>1</sup> a condition that does not exist in this case.

*System Testing* - CMS has received requests to approve planned software testing that stakeholders believe would enhance the probability of a successful transition to the new standard on January 1, 2020. While we support the thorough software testing prior to deployment, CMS has not historically provided guidance as to the types of testing that are

---

<sup>1</sup> 42 CFR Part 423 (CMS-0011-F) Accessible at <https://www.gpo.gov/fdsys/pkg/FR-2005-11-07/pdf/05-22026.pdf>.

appropriate. We rely on each stakeholder to evaluate the types of testing and the time frames needed. In order for a plan or pharmacy to ensure continued compliance with the SCRIPT standard, they must continue to fully support the existing SCRIPT standard (10.6) while testing of 2017071 is underway.

We appreciate the efforts that stakeholders are expending in order to ensure a successful transition to the new Part D e-prescribing standard by January 1, 2020. If, as stakeholders prepare for and test these changes, noteworthy issues are discovered that will affect implementation we encourage you to reach out to CMS so we can assist in their remediation. As we have noted on prior occasions, should contracted pharmacies experience implementation issues, we expect Part D sponsors to allow pharmacies to address any implementation issues without imposing financial penalties such as reduced reimbursement or additional DIR fee assessment.

If you have any questions about this memo please contact, [PartD\\_COB@cms.hhs.gov](mailto:PartD_COB@cms.hhs.gov).