

Women & Infants'

February 5, 2007

Melissa Musotto
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development—A
Centers for Medicare and Medicaid Services
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Ms. Musotto:

This letter responds to the Notice published in the Federal Register on December 8, 2006, pursuant to the Paper Work Reduction Act, requesting comment on a proposed data submission requirement that would mandate collection of National Drug Code (NDC) information by State Medicaid agencies with respect to covered outpatient drugs that are "physician administered." The Notice appeared at 71 Federal Register pages 71178 to 71179.

Women & Infants Hospital is strongly opposed to the application of the new data submission requirement to drugs administered by medical professionals to patients in hospital outpatient clinics or departments because of the enormous additional administrative and paperwork burdens such a requirement will place upon our staff. There are several computer systems involved in the recording and dispensing of drugs and the transfer of the appropriate information to the hospital and payor bill processing systems. With considerable effort and constant coordination between pharmacists and business managers, we are able to correctly make this transfer at the J-code level of detail. Adding NDC numbers further complicates this process. A single J-Code can apply to several NDC numbers, and vial sizes and manufacturers are often interchanged depending on the availability of drugs. Women & Infants had another payor who required NDC numbers on the bills. After some experience, we found that it is not practical to expect that employees whose training is in billing and who are under considerable pressure to process a large volume of bills each day to consistently determine the correct NDC numbers. Both parties agreed to abandon the NDC number billing in favor of the J-Code methodology.

In addition, it is unnecessary to subject hospitals and their outpatient clinics and departments to the paperwork and administrative burdens associated with the proposed NDC data submission requirement. The purpose of the proposed data submission is to enable State