



December 26, 2011

Robert Marier, MD, MHA, FACP
Executive Director
Louisiana State Board of Medical Examiners
630 Camp Street
New Orleans, LA 70130

RE: Louisiana Legislative Work Group on Electronic Prescribing Draft Report

Dear Dr. Marier:

On behalf of RelayHealth, the clinical connectivity business of the McKesson Corporation, I am pleased to submit comments for consideration pertaining to the recent draft report of the Legislative Work Group on Electronic Prescribing as requested by Louisiana Senate Resolution 81 (2011).

For 178 years, McKesson has led the industry in the delivery of medicines and healthcare products. As the largest distributor of pharmaceuticals in North America, we distribute over one-third of the medicines used each day across the country. As the largest health information technology company in the world, we are actively engaged in the transformation of healthcare from a system burdened by paper to one empowered by interoperable electronic solutions that improve patient safety, reduce the cost and variability of care, and improve healthcare efficiency.

RelayHealth connects retail, outpatient and long-term care pharmacies, providers, government entities, pharmaceutical manufacturers and payers. Through our pharmacy connectivity, claims processing, value-added solutions and data services business, we process more than 70 percent of all retail pharmacy prescription claims in the United States, including customers in the State of Louisiana.

RelayHealth applauds the Legislative Work Group on Electronic Prescribing's efforts to drive healthcare efficiency and quality by supporting the use of electronic prescribing (e-prescribing). We concur that e-prescribing and electronic prior authorization (e-PA) standards should be developed and that such standards should evolve nationally. Further, we urge the Work Group to consider existing technologies that promote e-PA simplification and efficiencies in their recommendations. Our comments below are in reference to Sections II and IV of the Report.

Page 4, Section II (B)(2): "At the present time there are no industry transaction standards for real-time e-prior authorization nor is there an accepted electronic format that has been demonstrated to facilitate distribution of prior authorization forms."¹

RelayHealth supports the automation and standardization of the existing prior authorization (PA) process and agrees with the report that the current state of PA is "often manual, nonstandard, and perceived as burdensome

¹ Louisiana Senate Resolution 81 (2011): Legislative Work Group Report 12/14/11. Section II (B)(2)

and costly.”² RelayHealth has a solution today that addresses this problem. RelayRx™ PriorAuthPlus is a real-time technology solution that automates the initiation of the PA process by using existing National Council for Prescription Drug Programs (NCPDP) pharmacy billing standards (i.e. NCPDP Telecommunication Standard). This solution minimally impacts workflows and enables our customers to:

- Select the correct PA form based on existing claim data;
- Auto-populate the patient, prescriber and drug information on the selected form thereby eliminating the need for a phone call or facsimile by the pharmacist to the prescriber;³
- Deliver the pre-populated form to the prescriber, who can add clinical information and sign electronically;
- Submit the prior authorization to the plan and communicate the plan’s response back to the pharmacy.

RelayHealth enables a more accurate and efficient process for prescribers, pharmacies, payers and patients. This nationwide solution currently improves the e-PA process for more than 14,000 pharmacies and 30,000 prescribers across the United States.

Page 7, Section IV (B): “Permit standards for e-prescribing and e-prior authorization and provisions for decision support to evolve nationally without imposition of standards at the state level (Resolution 2).”

RelayHealth strongly supports the Work Group’s recommendation that e-PA standards “evolve nationally without imposition of standards at the state level.” A state-by-state approach to e-PA would result in inconsistent e-prescribing and e-PA standards. Rather than simplify and generate efficiencies, this patchwork of laws could have a chilling effect on the promotion and adoption of health information technology. The private market is driving toward solutions that streamline and automate the PA process, and RelayHealth’s solution described above is just one example. These solutions will allow prescribers and pharmacists to spend more time on healthcare delivery and less time with cumbersome administrative processes.

NCPDP, whose members include many stakeholders in the e-PA process, recently reconvened its e-PA Task Group, and has a renewed urgency to develop an industry-wide standard for e-PA.⁴ We believe any standards developed should derive from NCPDP, an American National Standards Institute (ANSI)-accredited Standards Development Organization, given its ongoing experience and efforts in this area.

Page 7, Section IV (F): “Eliminate barriers to implementation of e- prescribing and e- prior authorization in state law and regulation such as inconsistencies, duplicative paper requirements, restrictions on the use of electronic data intermediaries, and restrictions on the use of electronic certification that a brand name is medically necessary.”

² Louisiana Senate Resolution 81 (2011): Legislative Work Group Report 12/14/11. Section II (B)(1)

³ PriorAuthPlus uses NCPDP Telecommunication Standards that support multiple real-time prior authorization transactions. These standards are intended to facilitate the prior authorization process between pharmacies and pharmacy benefit managers.

⁴ <http://www.ncdp.org/press/NCPDP%20TAKES%20ON%20THE%20EVOLVING%20NEEDS%20OF%20PRIOR%20AUTHORIZATIONS.pdf>



RelayHealth commends the Work Group's recommendation to eliminate barriers and inconsistencies in support of increased adoption of e-prescribing and e-PA technologies. The implementation of health information technology and prescription automation is critical to improve the quality and efficiency of care and reduce costs. We strongly support efforts to ensure that widespread adoption of such technologies is not hindered by onerous or duplicative restrictions and requirements at the state level.

Thank you for your leadership on this important issue and for the opportunity to provide comments. We urge the Work Group to consider solutions available in the market as you develop recommendations to the Legislature. I am happy to provide additional information or be a resource to the Work Group. Please contact me at (404) 728-2369 or scott.genone@relayhealth.com.

Sincerely,

Scott Genone
Vice President, RelayHealth Pharmacy