Advocacy & Policy: An EPIC Combination

Jessica Knutson & Susan Leppke National Marrow Donor Program/Be The Match

November 9, 2018





Calling All Super Heroes

Learning Objectives

 Become leaders in the community on health policy issues that affect transplant patients

Explain the impact of advocacy efforts on the health policy initiatives
Summarize critical reimbursement coding and billing updates that will

impact your transplant center in 2019





Disclosures

The following faculty and planning committee staff have the following financial disclosures:

Name	Institution	Disclosure
Gary Goldstein	Stanford Health Care	Novartis, Honorarium, Consultant; GLG, Fees, Consultant
Becky Dame	Be The Match Patient Advocate	None
Jessica Knutson	Be The Match	None
Susan Leppke	Be The Match	None
Naomi Cazeau	Memorial Sloan-Kettering Cancer Center	None
Katie Schoeppner	Be The Match	None





Panelist: Gary Goldstein

Business Manager for the adult BMT program at Stanford Health Care, where he oversees business operations for the Blood & Marrow Transplant and adult CAR-T therapy programs.







Panelist: Becky Dame

Transplant Nurse, Information Specialist, and Be The Match Advocacy Ambassador









Public policy is just as important as medical research in saving lives.



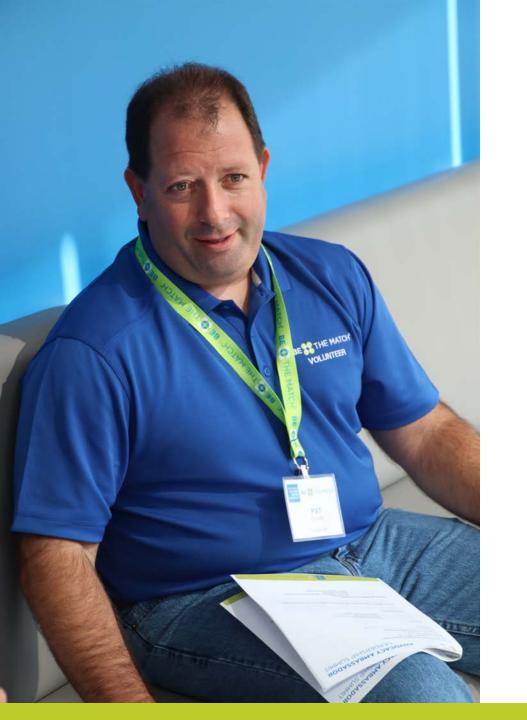


What is Advocacy

Advocacy is: using your voice to help save lives.

Advocacy activities include: **contacting lawmakers**, **writing emails**, **making phone calls**, **social media**, **and in-person visits to elected officials**.





Who is an advocate?

YOU.



Why is Advocacy Important?

- Many legislative changes in healthcare impacting pharmaceuticals, health professionals, hospitals and the patients we serve
- Members of Congress are overwhelmed - so many issues, so little time
- Offices rely on YOU for information on what's important

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Lisa Kendall-Maxson @tlmaxson

Follow

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@WarrenDavidson will you consider supporting the C.W. Bill Young Cell Transplantation Program and National Cord Blood Inventory like you're fellow congressional leaders have that will allow more lives to be saved like mine was? #BeTheMatchAction #HR4215 **@BTMPublicPolicy**



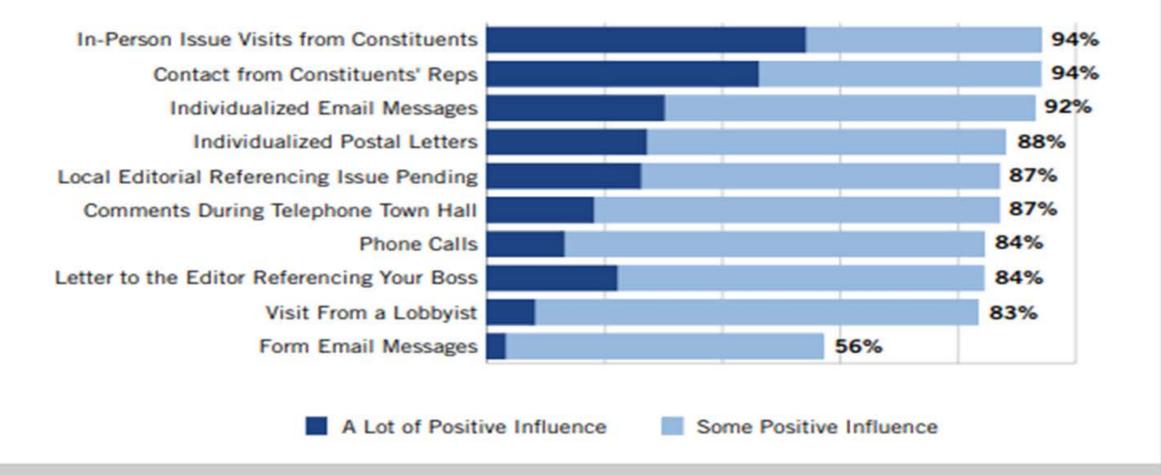
NMDP/Be The Match Public Policy @BTMPublicPolicy These members of Congress voted to ensure @BeTheMatch has continued funding to save lives all over the country. Do you recognize your representative? Thank them here: ms.spr.ly/6014r7NQi



How do legislators make decisions?

How large is the problem?	Do my constituents care about this issue?
What impact does it have on my district?	Does the issue affect me personally?
What other organizations care about this issue?	What is the cost?
NATIONAL MARROW DONOR PROGRAM®	Grab your cape.

If your Member/Senator has not already arrived at a firm decision on an issue, how much influence might the following advocacy strategies directed to the Washington office have on his/her decision?



(n = 190-192) Source: Congressional Management Foundation 2015 survey of congressional staff, including Chiefs of Staff, Communications Directors, Legislative Directors, and Legislative Assistants.

How to be an advocate

In-person meeting

> Personal emails

> Social Media

> Phone calls

> Town Halls





Who represents you?



NATIONAL MARROW DONOR PROGRAM®

PACT Act

The Protect Access to Cellular Transplant Act (PACT Act, HR 4215) will align blood and marrow transplant payment policy with solid organ payment policy for Medicare patients.

Appropriations

Determines federal funding for the C.W. Bill Young Cell Transplantation Program and the National Cord Blood Inventory.



Reauthorization

Congress authorizes the National Marrow Donor Program to be the nation's registry.

What Can YOU Do to Help Your Patients?



ACCESS TO CARE



The PACT Act HR 4215



Transplant centers lose thousands of dollars on each Medicare beneficiary they treat.

Financial losses incurred by transplant centers when treating Medicare patients threatens ability to continue to provide these transplants.



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DONOF PROGRAM Will require donor search and cell acquisition costs be reimbursed separately and at a reasonable cost rate —significantly improving reimbursement.



SUPPORT THE Protect Access to Cellular Transplant Act





HR 4215 Co-Sponsors: Bipartisan Support

PRIMARY SPONSORS Erik Paulsen (R-MN) BREAKDOWN 1 Republican

CO-SPONSORS

BREAKDOWN

Ron Kind (D-WI)Doris Matsui (D-CA)Gus Bilirakis (R-FL)Earl Blumenauer (D-OR)Betty McCollum (DFL-MN)Collin Peterson (DFL-MN)Lynn Jenkins (R-KS)Roger Marshall (R-KS)Zoe Lofgren (D-CA)Chris Smith (R-NJ)Joyce Beatty (D-OH)John Lewis (D-GA)Richard Hudson (R-NC)Dennis Ross (R-FL)Tom Rooney (R-FL)Salud Carbajal (D-CA)Pat Meehan (R-PA)Carol Shea-Porter (D-NH)Ro Khanna (D-CA)Tom Emmer (R-MN)Mike Thompson (D-CA)Charlie Crist (D-FL)Pete DeFazio (D-OR)Ken Marchant (R-TX)Peter Roskam (R-IL)Elizabeth Esty (D-CT)show less15Democrats, 11



Ask



› Work with leadership to pass HR 4215 immediately.





How to Take Action:

Urge Your Members of Congress to Cosponsor H.R. 4215

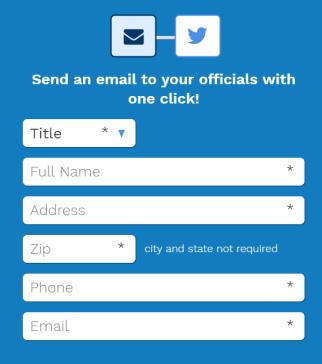
Medicare reimbursement for cellular transplants – like bone marrow, blood stem cells and cord blood – continues to fall far short of what it costs to provide care. Each passing month without resolution endangers the future of lifesaving treatments for those Americans with deadly blood cancers and blood diseases.

Hospitals are currently losing money on every Medicare patient that requires a cellular transplant. Hospitals are forced to choose between treating cancer patients or losing tens of thousands of dollars, an unsustainable situation that will inevitably result in blood cancer patients suffering reduced access to quality care.

Please contact your Members of Congress today! Urge them to cosponsor the Protect Access to Cellular Transplant (PACT) Act (HR 4215) to improve Medicare payment policy for lifesaving blood stem cell tranplants.

Instructions:

1. Enter you contact information.



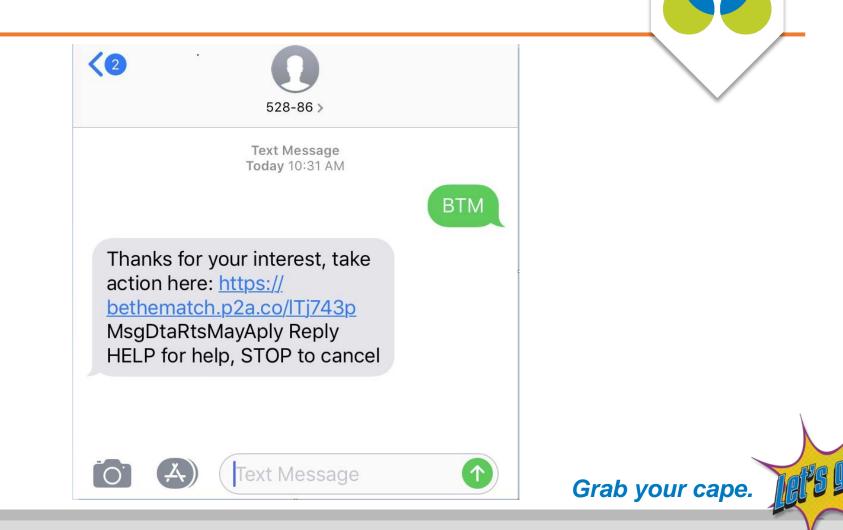
Find Legislators →

Send me emails about this campaignSend me text messages about this campaign





Text BTM to 52886





H.R. 4215



Text BTM to 52886

Help us protect patient access to care.

587 advocates498 messages sent



Big Wins

- +\$2.5 Million for C.W. Bill Young Cell Transplantation Program
- +\$4 Million for National Cord Blood Inventory
- +21 Co-sponsors for HR 4215





Advocacy Panel

Gary Goldstein, Business Manager, Blood & Marrow Transplant Program, Stanford Health Care

Becky Dame, RN Be The Match Advocacy Leadership Ambassador



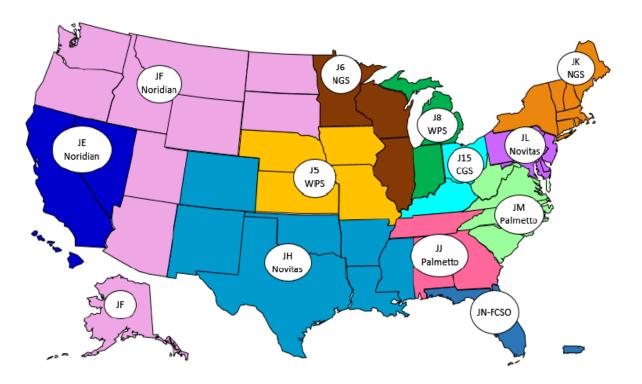


HEALTH POLICY UPDATES



Medicare Coverage: Allogeneic HCT

- Currently, Medicare's NCD does not address lymphoma
- "Local approach" avoids lengthy, national NCD reconsideration
- NMDP is working directly with Medicare Administrative Contractors (MACs)





Medicare Coverage: Allogeneic HCT



NGS Local Coverage Analysis ICD-10 Diagnosis Codes that are Covered

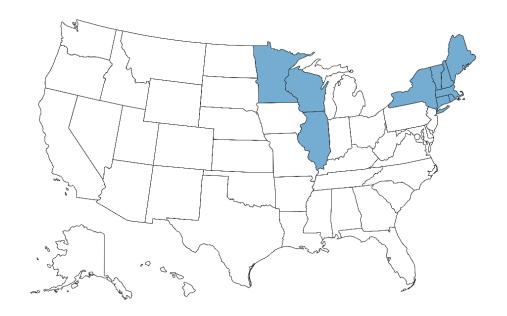
Code(s)	Description	
C81.01 - C81.09	Nodular lymphocyte predominant Hodgkin lymphoma, lymph nodes of head, face, and neck - Nodular lymphocyte predominant Hodgkin lymphoma, extranodal and solid organ sites	
C81.11 - C81.19	lymphoma, extranodal and solid organ sites Mixed cellularity Hodgkin lymphoma, lymph nodes of head, face, and neck - Mixed cellularity Hodgkin	
C81.21 - C81.29		
C81.31 - C81.39	Lymphocyte depleted Hodgkin lymphoma, lymph nodes of head, face, and neck - Lymphocyte depleted Hodgkin lymphoma, extranodal and solid organ sites	
C81.41 - C81.49	C81.41 - C81.49 Lymphocyte-rich Hodgkin lymphoma, lymph nodes of head, face, and neck - Lymphocyte-rich Hodgkin lymphoma, extranodal and solid organ sites C81.71 - C81.79 Other Hodgkin lymphoma, lymph nodes of head, face, and neck - Other Hodgkin lymphoma, extranodal and solid organ sites C81.91 - C81.99 Hodgkin lymphoma, unspecified, lymph nodes of head, face, and neck - Hodgkin lymphoma, unspecified, lymph nodes of head, face, and neck - Hodgkin lymphoma, unspecified, extranodal and solid organ sites	
C81.71 - C81.79		
C81.91 - C81.99		
C82.01 - C82.09	Follicular lymphoma grade I, lymph nodes of head, face, and neck - Follicular lymphoma grade I, extranodal and solid organ sites	
C82.11 - C82.19	C82.11 - C82.19 Follicular lymphoma grade II, lymph nodes of head, face, and neck - Follicular lymphoma grade II, extrano and solid organ sites C82.21 - C82.29 Follicular lymphoma grade III, unspecified, lymph nodes of head, face, and neck - Follicular lymphoma grade III, unspecified, extranodal and solid organ sites	
C82.21 - C82.29		

Resources:

NGS Local Coverage Article NGS Local Coverage Article Coding Guide



NGS Local Coverage Article





Lymphoma Coverage Expansion: Update

- Success with CGS (Ohio and Kentucky)!
 - Expanded coverage document coming soon
 - Noridian and Palmetto efforts underway



Success with targeted outreach will result in 31 states having coverage



Next Steps: Transplant Programs

Share if you have a potential KOL

Share if you have a good MAC Med Director contact Share the current NGS LGA with your MAC



REIMBURSEMENT



Reminder: Donor Search & Cell Acquisition

- Medicare <u>never pays separately</u>
 - Both search & acquisition included in DRG or APC payments
- Costs must be held until transplant
 - Requires manual tracking
 - Reported through Revenue Code 0815
 - Cancelled transplant costs captured in cost report



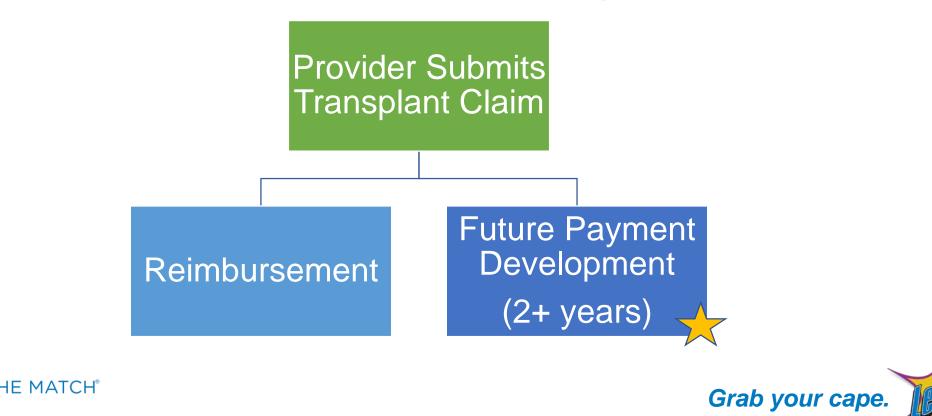
Revenue Code 0815

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Why is it important to report charges on revenue code 0815?

Medicare Rate-Setting



CY 19 OPPS Big Win!

- CY 19 Hospital Outpatient Prospective Payment System (OPPS) final rule dropped on November 2, 2018
- ASK: CMS should use additional, <u>correctly</u> coded cases for rate-setting in C-APC 5244
 - **SUCCESS**: An additional **\$12,247** per allogeneic case for CY 2019

Proposed Rule	\$26,645.86	36 cases
Final Rule	\$37, 892.76	49 cases





CMS FY19 IPPS Final Rule Update

FY19 Payment Rates

	MS-DRG	Weight	Base Payment Rate
-	MS-DRG 014 Allogeneic Bone Marrow Transplant	11.9503	\$71,701
	MS-DRG 016 Autologous Bone Marrow Transplant with CC/MCC or T-cell Immunotherapy	6.5394	\$39,236
	MS-DRG 017 Autologous Bone Marrow Transplant without CC/MCC	4.3811	\$26,286





Medicare IPPS Overview

MS-DRG 014 Allogeneic HCT

- 954 cases
- Most common diagnoses:
 - AML, MDS, CML, ALL, MM, DLBCL

MS-DRG 016 Autologous HCT w/ CC/MCC

- 2,097 cases
- Most common diagnoses:
 - MM, DLBCL, Tcell lymphoma, mantle cell lymphoma, amyloidosis

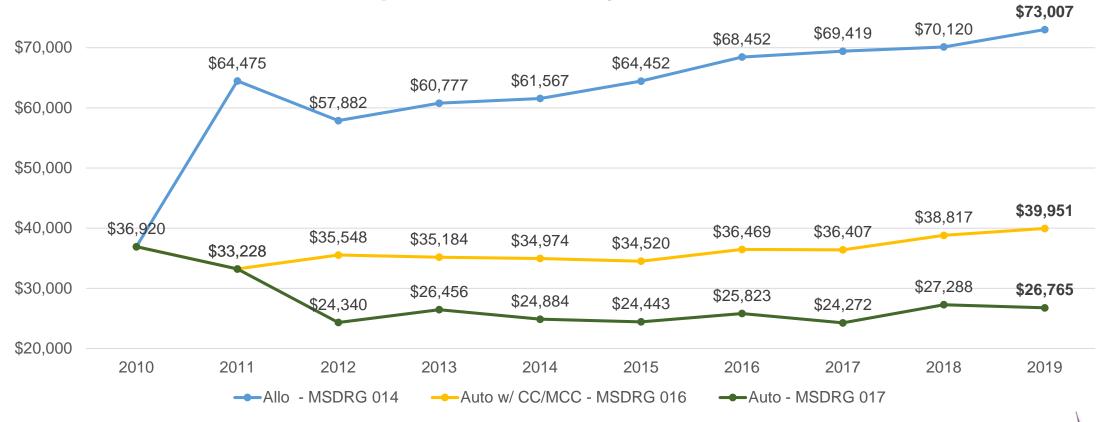
MS-DRG 017 Autologous HCT w/o CC/MCC

- 135 cases
- Most common diagnoses:
 - MM



CMS IPPS Success!

HCT Inpatient MS-DRG Payment Rate Trend





CMS FY19 IPPS Final Rule Update

- CMS finalized their proposal to rename MS-DRG 016 to "Autologous Bone Marrow Transplant with CC/MCC or T-cell Immunotherapy"
- In addition to the payment, CMS approved a separate New Technology Add On Payment (NTAP) for both Kymriah® and Yescarta®
 - The NTAP payment is limited to a cap which is set at 50% of the product cost or in this case \$186,500. This is the cap and not a guarantee
 - Outlier payment may also be possible





CMS FY19 IPPS Final Rule Update

- CMS did not address allogeneic HCT payment policy in the final rule
 - NMDP continues to advocate the importance of separate payment for donor search and cell acquisition costs (HR 4215, the PACT Act)

CMS <u>did address</u> a non-covered edit for allogeneic HCT for multiple myeloma

- CMS confirmed that multiple myeloma is a covered indication for allogeneic HCT under the current NCD CED
- CMS will update the ICD-10 Medicare Code Editor software to include ICD-10 codes C90.00 (Multiple myeloma not having achieved remission) and C90.01 (Multiple myeloma in remission).





Medicare Coding & Billing: Donor Source

All allogeneic HCT cases need to be reported with a donor source code

Related Donor HCT (7th digit 2)				
30243G2	Allogeneic related bone marrow via percutaneous venous central line infusion			
30243X 2	Allogeneic related cord blood via percutaneous venous central line infusion			
30243Y2	Allogeneic related peripheral stem cells via venous central line infusion			
Unrelated Donor HCT (7th digit 3)				
30243G 3	Allogeneic unrelated bone marrow via percutaneous venous central line infusion			
30243X 3	Allogeneic unrelated cord blood via percutaneous venous central line infusion			
30243Y 3	Allogeneic unrelated peripheral stem cells via venous percutaneous central line			
Donor Lymphocyte Infusion (DLI)				
30243Q 0	Percutaneous venous infusion of autologous white cells via central line			
30243Q1	Percutaneous venous infusion of non-autologous white cells via central line			





Donor Source Codes

The good news: TCs reported donor sources 98% of the time in FY17

The not so great news: Unknown donor source codes

Related L	Unrelated	Unknown
320 4	484	132

Bottom line: CMS needs TCs to report specific donor sources to accurately understand the case mix and costs associated with allogeneic HCT





CY19 OPPS Payment Rates

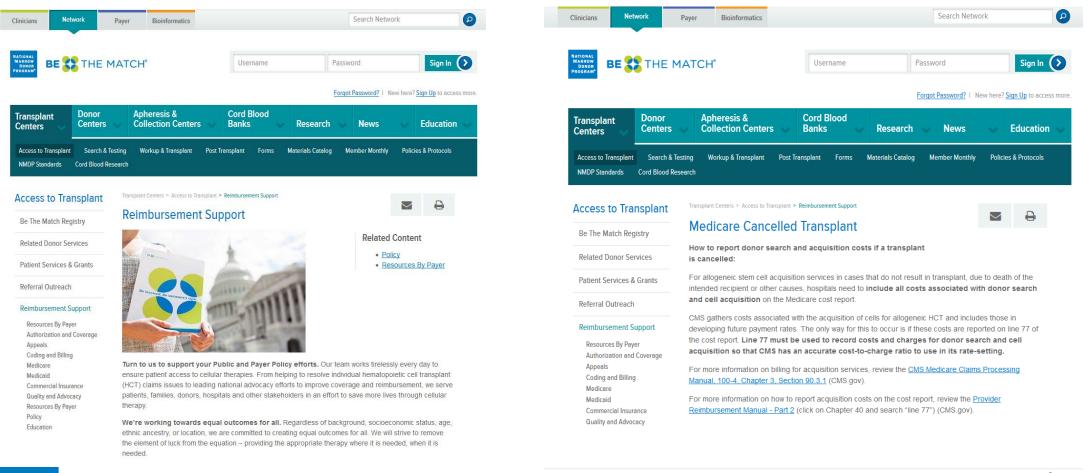
Medicare OPPS Reimbursement



NEW RESOURCES



NEW Reimbursement Resource Center



NATIONAL MARROW DONOR PROGRAM®



NEW Resources



CPT Codes Crosswalk 2018

NMDP Billable Services: Related Donor Services

The following medical services are purchased by the National Marrow Donor Program® (NMDP)/Be The Match® in order to provide each NMDP/Be The Match service for related donors. This detailed list of items and respective codes **represent our interpretation of the 2018 American Medical Association Current Procedural Technology (CPT) codes**. These CPT codes are **provided for reference only** and **do not include all components and costs** of services provided by the NMDP/Be The Match. Certain codes may not be recognized by particular payers, including The Centers for Medicare & Medicaid Services (Medicare). It is recommended that transplant centers consult their payer contracts for instructions on how to submit NMDP/Be The Match invoices.

NMDP/Be The Match fees, shipping and courier arrangement listed are only valid if donor and recipient are in the United States. Prices are only valid once a signed agreement is received by NMDP/Be The Match. For transplant centers outside the United States, please contact pricing@nmdp.org.

NMDP/Be the Match Service	CPT Code(s)	Description				
Workups Reaching Harvest						
Formal Search Billed once per patient	N/A	Generating requests to contact and test potential donors or cord blood units; repeat searches of NMDP/Be The Match file				
Fresh Blood Sample Includes shipping to transplant center (TC)	36415, 99000	Collection of venous blood by venipuncture; also called "Pre-Collection Sample Draw" or CT/IDM Sample Draw				
Buccal Swab Sample Includes shipping to TC	N/A	Solicit and transportation of buccal swab sample from prospective related donor (NMDP or TC)				







Allogeneic Hematopoietic Cell Transplant (HCT) Donor Billing

Transplant centers (TCs) **cannot** bill the donor or the donor's insurance provider for any donor search and cell acquisition charges associated with the recipient's allogeneic hematopoietic cell transplant (HCT). This resource contains general guidance on how TCs **can** code and bill for donor services.

General Billing Instructions, Payer Relations and Tips

- All donor-related charges, including those for donor search and acquisition costs and NMDP/Be The Match invoice fees, should be held and included on the recipient's transplant procedure claim itself using revenue code 0815 (inpatient or outpatient setting) as a line-item charge. Some providers may also elect to also use the HCPCS/CPT code 38204.
- 2. A complete recipient transplant bill should contain the following: acquisition charges, cost report days, and utilization days for the donor's hospital stay (if applicable) and/or charges for other encounters in which stem cells were obtained from the donor.
 - a. NMDP/Be The Match highly recommends that TC's adopt a process to identify, hold and itemize all donor-related charges until the transplant procedure. This will ensure that services furnished, the charges, and that the person receiving the service (donor or recipient), can be readily identified and reported in the stem cell/bone marrow acquisition cost center.
- Transplant centers CANNOT charge the donor's days of care against the recipient's utilization record. For cost reporting purposes, the utilization record includes the covered donor days and charges as Medicare days and charges.
- 4. Ensure that commercial contracts are updated with language that reflects advancements in cell acquisition and the TC's current practices.



NEW Resources (cont.)

MARROW DONOR PROGRAM

FastTrack[™] Search

MARROW DONOR PROGRAM*

Histocompatibility CPT Code Crosswalk

Service	CPT	CPT Description
Confirmatory Testing		
(CT) Blood Sample	36415	Collection of venous blood by venipuncture
		Syphilis test - non trepnomeal; qualitative (eg, VDRL, RPR,
	86592	ART)
	86644	Cytomegalovirus (CMV)
	86703	HIV-1 and HIV-2, single result
	86704	Hepatitis B core antibody (HBcAb), total
	86790	Virus, not elsewhere specified
	86803	Hepatitis C antibody
Infontious Discoss	86900	Blood typing, serologic; ABO
Infectious Disease Marker (IDM) Testing	86901	Blood typing, Rh (D)
at CT	87340	Hepatitis B surface antigen (HBsAg)
ator		Hepatitis C, amplified probe technique, includes reverse
	87521	transcription when performed
	86753	Antibody, protozoa, not elsewhere specified

		CPT	
Category	Subcategory	Codes	Required Tests
Tier 1 Molecular Pathology	HLA	81372	Class I typing, low resolution; complete A, B, C
		81378	Class I and II typing, high resolution; A, B, C, and DRB1
		81382	Class II typing, high resolution; one locus, each - DRB1, DRB3/4/5, DQB1, DQA1, DPB1, DPA1
		86812	Single antigen A/B/C
		86813	Multiple antigens A/B/C
Pathology	Other Non-HLA Factors	81403	Killer cell immunoglobulin-like receptor (KIR) gene family
		81400	CCR5 ∆32-bp deletion mutation
	Mixed Screen	86821	Lymphocyte Culture, mixed (MLC)
	PRA Screen - Class I and II	86807	Serum screening for cytotoxic percent reactive antibody; standard method
		86808	Serum screening for cytotoxic percent reactive antibody; quick method
	Single Antigen Bead - Class I and II	86828	Antibody to human leukocyte antigens (HLA), solid phase assays (e.g., microspheres or beads; ELISA, flow cytometry); qualitative assessment of the presence or absence of antibody(ies) to HLA Class I and Class II HLA antigens
		86829	Antibody to human leukocyte antigens (HLA), solid phase assays (e.g., microspheres or beads, ELISA, flow cytometry); qualitative assessment of the presence or absence of antibody(ies) to HLA Class I or Class II HLA antigens
		86830	Antibody to human leukocyte antigens (HLA), solid phase assays (e.g., microspheres or beads, ELISA, flow cytometry); antibody identification by qualitative panel using complete HLA phenotypes, HLA Class I
		86831	Antibody to human leukocyte antigens (HLA), solid phase assays (e.g., microspheres or beads, ELISA, flow cytometry); antibody identification by qualitative panel using complete HLA phenotypes, HLA Class II
		86832	Antibody to human leukocyte antigens (HLA), solid phase assays (e.g., microspheres or beads,



Take Action

Stay up-to-date by joining the Advocacy Action Network.

BeTheMatch.org/Advocacy

Be The **VOICE**

Protect Access to Care for Medicare Beneficiaries

Earlier this month, the Centers for Medicare & Medical Services (CMS) issued the Inpatient Prospecture Payment System (IPPS) Final Rule. Unfortunately: (CMS did not respond to the more than 1,000 comments requesting adequate payment to transplant centers who provide bone marrow, peripheral blood stem cell, and cord blood transplants (stem cell transplants) Ordicare patients. Leaving an

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transplants) to Medicare patients. Leaving an inaccurate reimbursement rate in place threatens the ability of Medicare patients to receive the life-saving transplant they need.

Several Members of Congress are disappointed with the tact that CMS has not resolved this problem, and are planning to introduce legislation this fall. The legislation void require CMS to align reimbursament for acquiring cells for stem cell transplant with that of acquiring solid organs. We support these efforts to protect patient access.

You can help tool it is important that all Members of Congress understand the importance of fixing this problem and protecting access to transplant. Please contact your Members of Congress today. Urge them to support this scon-to-be introduced legisation to reform Medicare payment policy bone marrow, peripheral blood stem cell and cord blood transplants.

I support this effort and am ready to Act Now!

I am a Healthcare Professional ready to Act Now!

I am a Patient ready to Act Now!

DONOR PROGRAM

I am a Donor/Registry Member ready to Act Now!

BE 🚼 THE MATCH

Contact Us: <u>Legislation@nmdp.org</u>

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payerpolicy@nmdp.org

Thank you to all the transplant centers who have submitted comments to the Centers for Medicare and Medicard Services (CMS) on the FY2018 IPPS Proposed Rule over the last two months. The proposed rule public comment panod closes tomorrow, June 13. CMS will release the final rule in 30 days. Watch find an update in the near eleves.

Last Chance to Submit A Comment

Submit a comment now

FY 2018 IPPS Proposed Rule Resources

Read NMDP/Be The Match's comment letters

- Review the slides from our recent IPPS webinar
- Thank you to the transplant centers who have commented
- ASBMT Pharmacy SIG Advocacy and Policy working committee
- Augusta University Medical Center
- Avera McKennan
- Baylor University Medical Center

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Thank you!

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