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American Society of Clinical Oncology
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2018 American Society of Hematology / American Society of Clinical Oncology

Hematology and Oncology Carrier Advisory Committee (CAC) Network Meeting

July 26 – 27, 2018

American Society of Hematology
2021 L Street, NW
Suite 900
Washington, DC 20036
(202) 776-0544

10th Floor Conference Center

American Society of Hematology/American Society of Clinical Oncology
Carrier Advisory Committee (CAC) Network Meeting
Friday, July 27, 2018
8:00 a.m. – 3 p.m.

AGENDA

7:30 a.m.	Breakfast Available	
7:45 a.m.	Mentor CAC 101	
8:30 a.m.	Welcome and Introductions	Co-Chairs
	<ul style="list-style-type: none">• ASH and ASCO Staff List• Attendee List• CAC Representatives• CMD List and Jurisdiction Map	
8:45 a.m.	Biosimilars	Jeffrey Crawford, MD
9:45 a.m.	Morning Break	
10:00 a.m.	Next Generation Sequencing	Katherine Szarama, PhD
11:00 a.m.	Case Study: Evidence Based Medicine	Arthur Lurvey, MD
12:00 p.m.	Working Lunch/Open Forum - E&M Coding	
12:45 p.m.	Case Study: CAR-T Cellular Therapy	Gary Goldstein
1:45 p.m.	Financial Implications of CAR-T Cell Therapies	Samuel Silver, MD, PhD
2:45 p.m.	Closing Remarks and Reference Materials	Co-Chairs
	<ul style="list-style-type: none">• CMS Resources• ASH Choosing Wisely• ASCO Choosing Wisely• ASH Practice Resources• ASCO Clinical Affairs Brochure• Meeting Evaluation Form• Meeting Reimbursement Policy• Meeting Reimbursement Form	
3:00 p.m.	Meeting Adjourn	

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COP = ASH Committee on Practice

RS = ASH Reimbursement Subcommittee

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CAC Acronyms

ACA - Affordable Care Act
ADLT - Advanced Diagnostic Laboratory Tests
ALL - Acute Lymphoblastic Leukemia
APM - Alternative Payment Model
ASBMT - American Society for Blood and Marrow Transplantation
ASCT - Autologous Stem Cell Transplantation
ASP - Average Sales Price
BMT - Bone Marrow Transplant
CAC - Carrier Advisory Committee
CAR-T - Chimeric antigen receptor T-cell therapy
CC/MCC - Complication or Comorbidity / Major Complication or Comorbidity
CCR - Cost-to-Charge Ratio
CHIP - Children's Health Insurance Program
CLFS - Clinical Laboratory Fee Schedule
CMD - Contractor Medical Director
CMS - Centers for Medicare & Medicaid Services
CPT - Current Procedural Terminology
CRS - Cytokine Release Syndrome
DLBCL - Diffuse Large B-Cell Lymphoma
DSH - Disproportionate Share Hospital
EMA - European Medicines Agency
FDA - U.S. Food and Drug Administration
GSP - Genomic Sequencing Procedures
HCT - Hematopoietic Cell Transplant
HPC - Hematopoietic Progenitor Cell
IME - Indirect Medical Education
IPPS - Inpatient Prospective Payment System
IVIg - Intravenous Immunoglobulin
LCD - Local Coverage Determination
MAC - Medicare Administrative Contractors
MACRA - Medicare Access & CHIP Reauthorization Act of 2015
MEDCAC - Medicare Evidence Development & Coverage Advisory Committee
MIPS - Merit-based Incentive Payment System
MS-DRG - Medicare Severity Diagnosis Related Group
NCA - National Coverage Analysis
NCCN - National Comprehensive Cancer Network
NCD - National Coverage Determination
NGS - Next Generation Sequencing
NTAP - New Technology Add-on Payment
OCM - Oncology Care Model
OPPS - Outpatient Prospective Payment System
ORR - Objective Response Rate
PAMA - Protecting Access to Medicare Act of 2014
PK/PD - Pharmacokinetic/Pharmacodynamic Modeling
PPS - Prospective Payment System
RVUs - Relative Value Units
TNF-agent - Tumor Necrosis Factor
USPSTF - United States Preventive Services Task Force
WI - Wage Index



ASCO

CAC 101: An Introduction to Carrier Advisory Committees



ASCO

According to Medicare Coverage Rules

- The decision about whether to cover or, in some cases, not to cover various products and services is typically made at the local level, by Medicare Administrative Contractors (MACs)
- CMS rules require MACs to establish Carrier Advisory Committees (CACs) to advise the contractors about Local Coverage Decisions (LCDs) as long as the proposed coverage or non-coverage does not conflict with existing National Coverage Decisions (NCDs).
- MACs must establish one CAC per state
- Where one MAC oversees multiple states, it must create a separate CAC for each state.



ASCO

Purpose of the CAC

- A mechanism for physicians to be informed of and participate in development of LCDs;
- An opportunity for physicians to discuss and improve administrative policies within MAC discretion; and
- A forum for the exchange of information between carriers and physicians.



ASCO

CAC Members

- Physicians from various specialties (one member & designated alternate for each specialty, with additional members when issues within their expertise are under discussion);
- A beneficiary representative; and
- Representatives of other medical organizations.



ASH/ASCO CAC Network Annual Meeting

At the ASH/ASCO CAC Network Annual Meeting, individuals from the following groups are invited:

- ASH Committee on Practice
- ASH Reimbursement Subcommittee
- ASCO Clinical Practice Committee
- Medicare Contractor Medical Directors
- Hematology CAC Representatives
- Oncology CAC Representatives
- State Society Presidents
- State Society Executive Directors



CAC Members

CAC Members are responsible for:

1. Disseminating proposed LCDs to colleagues for comment;
2. Disseminating information about the Medicare program obtained at the CAC meetings; and
3. Discussing inconsistent or conflicting Medical Review policies.
4. Contributing to other specialties' LCDs. This is helpful for the MAC and helps CAC Members gain credibility.



ASCO

National Coverage Determination (NCD)

- Determined by CMS.
- CMS is advised, at its discretion, by Medicare Evidence Development & Coverage Advisory Committee (MEDCAC), or can conduct an external technology assessment.
- Supersedes MAC policies.
- Can specify services never and/or always covered.
- NCDs can change as science and research emerge.
- NCDs play a growing role in coverage, particularly for very expensive items and services



ASCO

NCD Process

- Generally, CMS has six to nine months to complete the process after it is initiated (depending on whether technology assessment or MEDCAC review is needed).
- The MEDCAC process includes a public forum, including public testimony.
- Proposed decision is then posted to the CMS website for a 30 day comment period.
- Final decision posted within 60 days after the conclusion of the comment period.



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Local Coverage Determinations (LCD)

- LCDs are decisions by a MAC, fiscal intermediary, or carrier on whether to cover a particular service.
 - LCDs specify under what clinical circumstances a service is considered reasonable and necessary.
 - They can also provide administrative and educational tools to assist providers in submitting correct claims for payment.
-
- It is important to note: LCD is the typical mechanism for most Medicare coverage policies



ASCO

Development of LCDs

- MACs must develop new/revised LCDs when a service or item is never covered under certain circumstances and the MAC wants to establish an automated review in the absence of an NCD.
- MACs may develop a LCD if it identifies a widespread problem that poses a risk to Medicare trust funds.
- MACs may also develop a LCD if deemed necessary in order to ensure access to care for beneficiaries.



ASCO

LCD Process: CAC Role

- MACs must solicit comments from the physician community, utilizing CACs at the state level.
- The comment period begins upon submission to the CAC at a regularly scheduled meeting or delivery in writing to all CAC members.
- Minimum comment period of 45 days.



ASCO

Interaction Between NCD and LCD

- The scope of an NCD can leave room for LCDs to remain in place for certain patients.
- For example, the final NCD on Next Generation Sequencing for Medicare Beneficiaries with Advanced Cancer will allow MACs to continue to provide coverage at the local level for NGS-based tests that are not automatically covered by the NCD. Several local coverage determinations that provide coverage for hematological malignancies will now remain in effect.
- Thus, for some products, both an NCD and an LCD may have relevance.

Biosimilars

Jeffrey Crawford, MD

Jeffrey Crawford, MD, is George Barth Geller Professor for Research in Cancer and Duke University Medical Center and Co-Director of the Solid Tumor Therapeutics Program in the Duke Cancer Institute (DCI) in Durham, North Carolina. He earned his medical degree from Ohio State University and completed his internship, residency and hematology/oncology fellowship at Duke University Medical Center. Dr. Crawford was chief resident in medicine and also completed a fellowship in geriatrics in Veterans Administration Medical Center in Durham, North Carolina. He is board certified in internal medicine, hematology and oncology. Dr. Crawford served as Chief of the Division of Medical Oncology for 10 years prior to assuming his current leadership role in the DCI as Co-Director of the Solid Tumor Therapeutics Program.

Dr. Crawford is Principal Investigator for the National Clinical Trials Network Lead Academic Site Grant at Duke. He is a member of the executive committee for the Alliance and Chair of NCCN Myeloid Growth Factors Panel.

Dr. Crawford's research interests include new treatment approaches to lung cancer, supportive care therapies, including hematopoietic growth factors, and agents that impact muscle wasting. He has published more than 180 manuscripts and chapters. As NCCN panel chair, he helped develop the guidelines for the first FDA approved biosimilar, filgrastim-Sndz. Due to his experience with growth factors and other biologics, Dr. Crawford has participated in the review process for several other biosimilars in development, as well as helped develop national educational programs for the incorporation of biosimilars into oncology.

Biosimilars

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Biosimilars in Oncology

Discussion Points:

- Science and regulatory issues for biosimilars
- The case for utilization: pharmaceutical costs and health economics
- Clinical trial concepts and examples demonstrating similar efficacy and toxicity of biosimilars
- Value and pitfalls: physician and patient perceptions

Traditional Pharmaceuticals vs Biologics

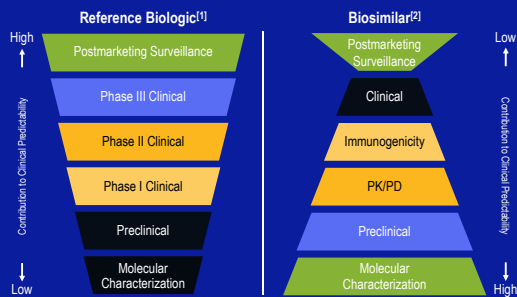
- Differences in size, structure, and complexity
- Generics are commonly small-molecule drugs
 - Small molecules <100 atoms
 - Manufactured by chemical synthesis
 - Well-defined stable structure held together by strong chemical bonds
- A biologic is complex and large
 - Large molecules: 5,000-20,000 atoms
 - Produced by living cells
 - Spatial structures (secondary and tertiary) based on relatively weak bonds and post-translational modifications to form the 3D conformation
 - Structurally may be antibody, hormone, cytokine, etc

Definitions, FDA, US Food and Drug Administration

Generic	Reference Product	Biosimilarity	Interchangeability
FDA evaluates and establishes therapeutic equivalence of generics Must be pharmaceutically equivalent as well as bioequivalent	Single biologic product licensed by the FDA against which a proposed biosimilar biologic product is evaluated in its biosimilar application	FDA evaluates and establishes biosimilarity Highly similar to an already FDA-approved biological product, and shown to have no clinically meaningful differences from the reference product	FDA evaluates and establishes interchangeability Meets the definition of biosimilar and the biosimilarity standard, and is expected to produce the same clinical result as the reference product in any given patient For a biologic product that is administered more than once to an individual, the risk in terms of safety, or diminished efficacy of alternating or switching between use of the biologic product and the reference product, is not greater than the risk of using the reference product without such alternation or switching

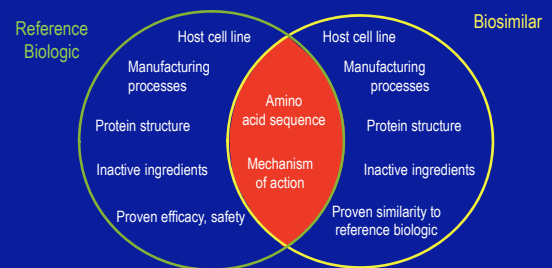
Lyman, et al. JCO 2016, 36, 1260-1265

Biosimilars Represent Paradigm Shift in Product Development



1. FDA. Drug development overview, 2012. 2. FDA. Scientific considerations in demonstrating biosimilarity to a reference product: guidance for industry, 2015.

What Features Do Biosimilars Share with Their Reference Biologics?



Li E, et al. J Manag Care Spec Pharm. 2015;21:532-539. Weise M, et al. Blood. 2012;120:5111-5117. Lucio SD, et al. Am J Health Syst Pharm. 2013;70:2004-2017. FDA. Information on biosimilars, 2016.

Assuring Comparable Safety and Efficacy of a Biosimilar to Its Reference Biologic

- Biosimilars are designed to replicate **purity, potency, and safety** of reference biologics, which is anticipated to translate into clinical comparability^[1]
- After thorough assessment of this comparability by regulatory bodies,^[2] approval of biosimilar is:
 - Based on preclinical/clinical studies of pharmacology, efficacy, safety, immunogenicity^[2]
 - For specific indications only; extrapolation to other indications must be justified
 - Subject to postmarketing surveillance to identify any unique safety signals

1. Schellakens H, et al. *Lancet Oncol.* 2016;17:e502-509.
2. FDA. Scientific considerations in demonstrating biosimilarity to a reference product. 2015.

Extrapolation: Clinical Perspective

- Extrapolation is an unfamiliar concept for clinicians
- Traditionally, clinicians have relied on clinical trial data to judge the safety and efficacy of therapeutic agents
- By definition, approval of a biosimilar for one indication may be based on extrapolation from the biosimilar to the reference biologic
- **Therefore, no specific clinical trials with a biosimilar may have been performed in the approved indication/population**
- Thus, the paradigm shift in biosimilar development also requires a paradigm shift in evaluation and use of biosimilars in the clinical setting

Weiss M, et al. *Blood.* 2014;124:3191-3196.

Key Principles for Extrapolation of Biosimilars

- Common mechanism of action and receptor/target interaction
- Totality of the evidence showing comparability
- Acceptable safety profile without increased risks of immunogenicity
- Clinical experience with the originator product that can be used to support the use of a biosimilar across indications
- Post-marketing surveillance is critical for all indications

Weiss M, et al. *Blood.* 2014;124:3191-3196.

Extrapolation to Additional Indications Possible with Scientific Justification

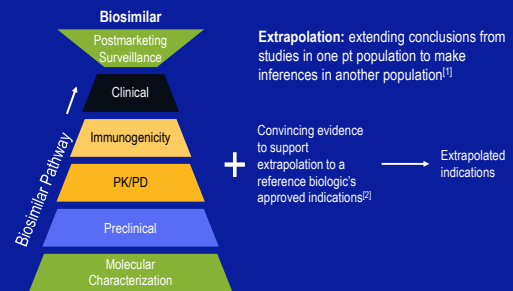


Image adapted from Sherman RE. Biosimilar Guidance Webinar, February 15, 2012.
1. EMA. Concept paper on extrapolation of efficacy and safety in medicine development. 2012.
2. Weiss M, et al. *Blood.* 2012;120:3111-3117.

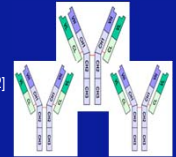
Variability and Drift

- Significant differences in drug products (variability and drift) can arise due to:
 - production at different sites
 - changes to manufacturing processes after initial approval
 - FDA or EMA approval required for changes in manufacturing process
- Manufacturers need to be vigilant for any changes in production and must always assume that they can result in clinically significant issues

Both biologics and biosimilars are subject to product variability and drift!

Ramanan S, et al. *BioDrugs*. 2014;28:363-372.

Immunogenicity



- Concern for all biologics (not just biosimilars)^[1,2]
- Consequences^[1,2]
 - Loss of efficacy
 - Neutralization of endogenous protein and administered biologic agent
 - General immune responses (eg, allergy, anaphylaxis)
- FDA guidance regarding immunogenicity assessment^[3]
 - Comparative parallel design (ie, head-to-head study)

1. Ebbens HC, et al. *Exp Opin Biol Ther*. 2012;12:1473-1485.

2. Chamberlain PD. *Biosimilars*. 2014;4:22-43.

3. FDA. Scientific considerations in demonstrating biosimilarity to a reference product. 2015.

Pharmacovigilance

- Post-approval pharmacovigilance for efficacy and safety of biologic agents is important and of particular importance when considering biosimilars
 - Product drift may occur over time and space
 - Rare or delayed toxicities may only emerge post-approval
 - Population-based assessments may identify rare safety concerns
 - Might be mandatory for some products
- Biosimilar manufacturers should work with FDA early to discuss approach

Gramp G, et al. *BioDrugs*. 2015;29:309-321. Ramanan S, et al. *BioDrugs*. 2014;28:363-372.

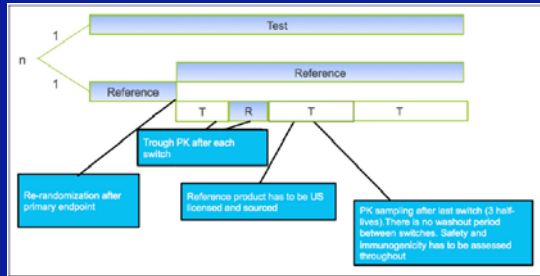
Interchangeability of Biosimilars

- A biosimilar may also be designated as “interchangeable” if there is proof that:
 - Switching or alternating between the biosimilar and the reference product does not affect safety or efficacy any more than using the reference product more than once without such alternating or switching

The designation of “interchangeability” requires higher standards than “biosimilarity” alone

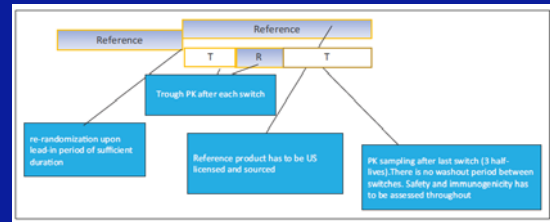
FDA. Considerations in Demonstrating Interchangeability With a Reference Product: Guidance for Industry. 2017.

Interchangeability as Part of Confirmatory Study Design



Chance K. Therapeutic Innovation and Regulatory Science 2018 52(3):369-373

Standalone Interchangeability Study Design



Chance K. Therapeutic Innovation and Regulatory Science 2018 52(3):369-373

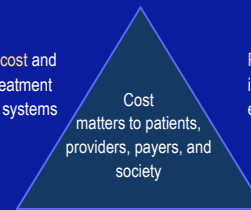
Automatic Substitution

- Interchangeable is an FDA designation
 - Proposed that a product with an interchangeable designation can be substituted for the reference product without notification or intervention by the original provider
- HOWEVER:
 - Any biological product under consideration for substitution must first be approved as "interchangeable" by the FDA
 - FDA approval requirements for interchangeable designation and trial design for testing are not finalized
 - State substitution laws will impact practice
 - To date, no approved US biosimilars have applied for and gotten interchangeability status

FDA. Considerations in Demonstrating Interchangeability With a Reference Product: Guidance for Industry. 2017.
NCSL. State Laws and Legislation Related to Biologic Medications and Substitution of Biosimilars. 2017.

Why Interest in Biosimilars? Rising Healthcare Costs

Great variability in cost and quality of cancer treatment across health care systems



Patients bear an ever-increasing share of the expense: financial toxicity

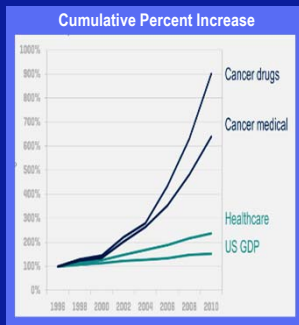
Cost affects access to care, treatment decisions, and patient outcomes



"Price is what you pay. Value is what you get." - Warren Buffett

Singh SC, et al. *Am J Manag Care.* 2015;(21 suppl):s331-s340.

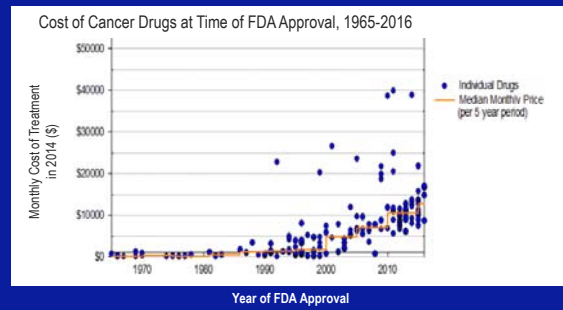
Costs of Cancer Care



Top 10 Medicare Drugs	Cost in Millions
Ranibizumab	1220
Rituximab (oncology)	876
Infliximab	704
Pegfilgrastim	642
Bevacizumab	624
Aflibercept	384
Denosumab	347
Oxaliplatin	309
Pemetrexed	292
Bortezomib	278

Need for Biosimilars in Oncology

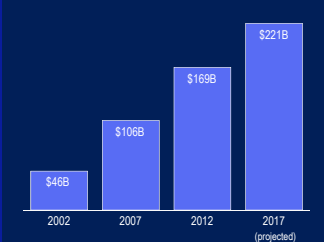
Rising Costs of Cancer Drugs



Adapted from MSKCC Center for Health Policy and Outcomes. Available at: <http://www.mskcc.org/research/health-policy-outcomes/cost-drugs>. Accessed May 19, 2017.

Global Spending on Biologics Continues to Increase

Global Biologics Sales, 2002-2017^[1]

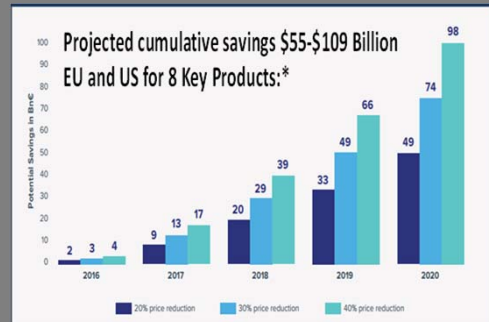


- Biologics continue to outpace overall pharmaceutical drug spending growth^[1]
 - Expected to represent ~20% of global market value by 2017
- Patient access to biologic therapies is a concern^[2]

1. IMS Institute for Healthcare Informatics. The global use of medicines: outlook through 2017. November 2013. 2. Baer WH, et al. *Pharmaceuticals* (Basel). 2014;7:530-544.

Remaining Challenges and Opportunities Ahead

- Expected cost savings of 10 - 20% in US markets



*adalimumab, insulin glargine, etanercept, infliximab, rituximab, peg-filgrastim, trastuzumab and follitropin alpha
 IMS Health http://www.imshealth.com/View/Details.aspx?path=Pharmaceuticals/MS_Media_Biosimilars_Savings_2016-2020

Biosimilar Agents Approved for Use in the European Union

Molecule	Biosimilar Agent by Trade Name (Manufacturer)	Year Approved
Nononcology		
Somatropin	Omnitrope (Sandoz) Valtropin (BioPartners)	2006, 2006 2006, withdrawn 2012
Epoetin alfa	Abseamed (Medice Arzneimittel Putzer) Bincore (Sandoz) Epoetin alfa Hexal (Hexal)	2007 2007 2007
Epoetin zeta	Silapo (Stada Arzneimittel) Retacrit (Hospira)	2007 2007
Infliximab	Inflextra (Hospira) Remsima (Celltrion) Flixabi (Samsung Bioepis)	2013 2013 2016
Follitropin alfa	Ovaleap (Teva) Bemfolia (Fresco Biotech)	2013 2014
Insulin glargine	Abasaglar (Eli Lilly/Boehringer Ingelheim) Lusduna (Merck) Semglee (Mylan)	2014 2017 CHMP positive opinion 2018
Insulin lispro	Insulin lispro Sanofi (Sanofi-Aventis)	CHMP positive opinion 2017
Enoxaparin	Inhixa (Tchadov Europe) Thorinane (Pharmathen)	2016 2016
Etanercept	Benepali (Samsung Bioepis) Erelzi (Sandoz)	2016 2017
Teriparatide	Moyymia (Stada Arzneimittel) Terrosa (Cedeeon Richter)	2017 2017
Adalimumab	Amgevita (Amgen) Solymbic (Amgen) Imraldi (Samsung Bioepis) Cyltezo (Boehringer Ingelheim)	2017 2017 2017 CHMP positive opinion 2017

GH Lyman et al. *N Engl J Med* 2018;378:2036-2044.

Biosimilar Agents Approved for Cancer Use in the European Union

Molecule	Biosimilar Agent by Trade Name (Manufacturer)	Year Approved
Oncology		
Filgrastim	Biograstim (CT Arzneimittel) Ratiograstim (Ratiopharm) Tevagrastim (Teva) Filgrastim Hexal (Hexal) Zarzio (Sandoz) Nivestim (Hospira) Grastofil (Apotec) Accofil (Accord Healthcare)	2008, withdrawn 2016 2008 2008 2009 2009 2010 2013 2104
Rituximab	Truxima (Celltrion) Riximyo (Sandoz) Rixathon (Sandoz) Blitzima (Celltrion) Rituximia (Celltrion) Rituzena (Celltrion)	2017 CHMP positive opinion 2017 2017 2017 2017 2017
Trastuzumab	Ontruzant (Samsung Bioepis) Herzuma (Celltrion Healthcare)	2017 CHMP positive opinion 2017
Bevacizumab	Mvasi (Amgen)	2018

GH Lyman et al. *N Engl J Med* 2018;378:2036-2044.

Biosimilar Agents Approved in the United States – TNF-alpha Inhibitors

Reference Product by Generic Name (Trade Name, Manufacturer)	Biosimilar Agent by Nonproprietary Name (Trade Name, Manufacturer)	Year Approved	Year Marketed
Nononcology			
Infliximab (Remicade, Janssen Biotech)	Infliximab-dyyb (Inflextra, Celltrion/Pfizer) Infliximab-abda (Renflexis, Samsung Bioepis) Infliximab-qbtz (Ixifi, Pfizer)	2016 2017 2017	2016 2017 Not available
Etanercept (Enbrel, Amgen)	Etanercept-szszs (Erelzi, Sandoz)	2016	Not available
Adalimumab (Humira, AbbVie)	Adalimumab-atto (Amjevita, Amgen) Adalimumab-adbm (Cyltezo, Boehringer Ingelheim)	2016 2017	Not available Not available

GH Lyman et al. *N Engl J Med* 2018;378:2036-2044.

Biosimilar Agents Approved in the United States – Hematology / Oncology

Oncology	Reference Product by Generic Name (Trade Name, Manufacturer)	Biosimilar Agent by Nonproprietary Name (Trade Name, Manufacturer)	Year Approved	Year Marketed
Filgrastim (Neupogen, Amgen)	Filgrastim-sndz (Zarzio, Sandoz)		2015	2015
Bevacizumab (Avastin, Genentech)	Bevacizumab-awwb (Mvasi, Amgen)		2017	Not available
Trastuzumab (Herceptin, Genentech)	Trastuzumab-dkst (Ogivri, Mylan/Biocon)		2017	Not available
Epoetin alfa (Eprex/Procrit) (Amgen/Ortho)	Epoetin-alpha epbx (Retacrit, Pfizer)		2018	Available 2018
Pegfilgrastim (Neulasta, Amgen)	Pegfilgrastim -jmbd (Fulphilia, Mylan/Biocon)		2018	Available 2018

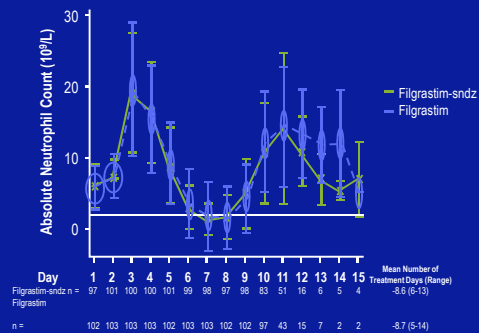
GH Lyman et al. *N Engl J Med* 2018;378:2036-2044.

First FDA-Approved Biosimilar: Filgrastim-sndz—Analytics, PK/PD, Safety

- Approved March 6, 2015; first FDA-approved oncology-related biosimilar
- Structural and functional studies demonstrated same amino acid sequence as US-licensed filgrastim
- Biological activity, receptor binding and physicochemical properties, product-related substances and impurities, and stability profile are highly similar to US-licensed filgrastim, notwithstanding minor differences in clinically inactive components
- 5 studies in healthy subjects evaluating ANC, C_{max} and CD34+ cell counts demonstrated PK/PD similarity with US-licensed and EU-approved filgrastim
- Safety data in 204 healthy subjects and 214 pts with breast cancer were similar to US-licensed and EU-approved filgrastim

FDA, Oncologic Drugs Advisory Committee Meeting, 2015.

Filgrastim-sndz: Efficacy



FDA, Oncologic Drugs Advisory Committee Meeting, 2015.

Extrapolation of Biosimilar Filgrastim to Other Indications in US

- FDA approved use of filgrastim-sndz for all current FDA indications of filgrastim

Biosimilar	Study Patient Population	Additional Indications Extrapolated to by FDA
Filgrastim-sndz	Neutropenia in breast cancer treatment	<ul style="list-style-type: none"> • Neutropenia in BMT • Neutropenia in treatment of nonmyeloid malignancies • Neutropenia in AML • Severe chronic neutropenia • Peripheral blood progenitor cell mobilization

FDA, Oncologic Drugs Advisory Committee Meeting, 2015.

Biosimilar Products in Development in the United States

Reference Product by Generic Name	Mechanism of Action	U.S. Patent Expiration	Current Status
Filgrastim	Colony-stimulating factor	2013	Product developed by Adello accepted for FDA review in September 2017
Pegfilgrastim	Long-acting colony-stimulating factor	2015	Two agents accepted for FDA review: MYL1401H (Mylan/Biocon) and CHS-1701 (Coherus) MYL1401H approved; CHS-1701: rejected by FDA in June 2017
Cetuximab	EGFR receptor inhibition	2016	ABP494 (Actavis/Amgem): remains in preclinical development
Rituximab	CD20 receptor inhibition	2016	ABP798 (Actavis/Amgem): phase 3 trial in non-Hodgkin's lymphoma expected to be completed in late 2018 CT-P10 (Celltrion/Teva): accepted for FDA review in June 2017 GP2013 (Sandoz): accepted for FDA review in September 2017

GH Lyman et al. *N Engl J Med* 2018;378:2036-2044.

Biosimilar Products in Development in the United States

Product	Target	Year	Development Status
Adalimumab	Binds soluble TNF	2017	CHS-1420 (Coherus): phase 3 trial completed in January 2017 ONS-3010 (Oncobiologics/Viropro): phase 3 trial to start in 2018 PF-06410293 (Pfizer): phase 3 trial ongoing
Denosumab	Binds RANK ligand	2017	ONS-4010 (Oncobiologics): preclinical work ongoing
Infliximab	TNF receptor inhibition	2018	ABP710 (Amgen): in development NI-071 (Nichi-iko): phase 3 trial expected to be completed in February 2019
Bevacizumab	Binds soluble VEGF	2019	ONS-1045 (Oncobiologics/Viropro): phase 3 trial to start in 2018 PF-06439535 (Pfizer): phase 3 trial in lung cancer started in February 2015 SB8 (Samsung Bioepis/Merck): phase 3 in lung cancer ongoing
Trastuzumab	HER2 receptor inhibition	2019	CT-P6 (Celltrion/Teva): application submitted to FDA in July 2017 ONS-1050 (Oncobiologics/Viropro): phase 1 trial to start in 2018 PF-05280014 (Pfizer): application submitted to FDA in September 2017
Ranibizumab	Binds soluble VEGF	2020	CHS-3351 (Coherus): preclinical work ongoing PF852 (Hospira/Pfizer): phase 2 trial in age-related macular degeneration ongoing

GH Lyman et al. *N Engl J Med* 2018;378:2036-2044.

FDA Committee Recommends Approval of Epoetin alfa Biosimilar Across All Indications

- On May 25, 2017, FDA Oncologic Drugs Advisory Committee recommended approval of an epoetin alfa biosimilar across all indications of reference biologics for treatment of anemia
 - Preclinical data of biosimilar supported similarity to epoetin alfa in structure, function, and mechanism of action
 - Clinical PK/PD, immunogenicity studies showed similarity to epoetin alfa
 - 2 phase III trials showed comparable safety and efficacy in the treatment of **chronic kidney disease pts with anemia**
 - Approved by FDA, May 1, 2018 as epoetin alfa-epbx

FDA. Available at: <https://www.fda.gov/downloads/advisorycommittees/committeesmeetingmaterials/drugs/oncologicdrugsadvisorycommittee/ucm559968.pdf>.

Trastuzumab-dkst: Analytical Studies

- Approved 2017 by FDA
- Physicochemical analyses
 - Impurities, fragmentations, glycosylation, charge heterogeneity
 - Primary sequence, higher order structure, protein concentration, Fab and Fc function
- Nonclinical studies
 - Cardiotoxicity in human and rat cardiomyocytes
 - Comparative PK, repeat-dose toxicity in cynomolgus monkeys

Rugo HS, et al. ASCO 2016. Abstract LBA903.

Trastuzumab-dkst: PK Studies

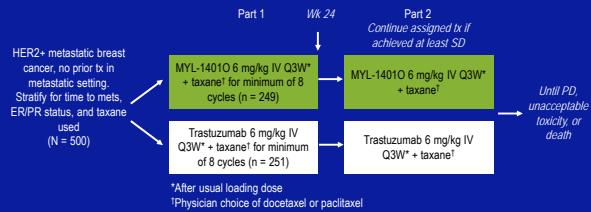
Comparable pharmacokinetics to trastuzumab

MYL-14010 LS Means Ratio (90% CI)	AUC _{0-∞} (mg*hr/mL)	C _{max} (mg/mL)
vs trastuzumab (EU)	0.97 (90.76-102.84)	1.04 (98.90-109.41)
vs trastuzumab (US)	0.95 (89.16-101.36)	1.01 (95.81-106.39)

Mylan Inc. British Pharmacology Meeting 2015.

HERITAGE: First-line Trastuzumab vs Biosimilar MYL-14010 in ERBB2+ Metastatic Breast Cancer

- Part 1 results for multicenter, randomized, double-blind phase III equivalence study



- Primary endpoint (Wk 24): ORR
- Secondary endpoints (Wk 48): tumor progression rate, PFS, OS

Rugo HS, et al. *JAMA* 2017;317:37-47.

HERITAGE: Efficacy at Weeks 24 and 48

- MYL-14010 met statistical therapeutic equivalence of trastuzumab for 24-wk ORR by both analyses (difference in ORR, rate ratio for ORR)
 - Both 90% CIs and 95% CIs within predefined equivalence boundaries

Wk 24 Endpoint	MYL-14010 + Taxane (n = 230)	Trastuzumab + Taxane (n = 228)	Difference, %	Rate Ratio
ORR, n (%)	160 (69.6)	146 (64.0)	5.53	1.09
• 90% CI, %	64.57 to 74.56	58.81 to 69.26	-1.70 to 12.69	0.974 to 1.211
• 95% CI, %	63.62 to 75.51	57.81 to 70.26	-3.08 to 14.04	0.954 to 1.237

- No statistically significant differences between MYL-14010 vs trastuzumab for 48-wk rates of tumor progression, progression events, and OS

Wk 48 Endpoint, %	MYL-14010 + Taxane (n = 230)	Trastuzumab + Taxane (n = 228)	Stratified HR (95% CI)*	P Value
Tumor progression	41.3	43.0	0.92 (0.692-1.231)	.58
Progression events	44.3	44.7	0.95 (0.71-1.25)	.69
OS	89.1	85.1	0.61 (0.36-1.04)	.07

*Stratified by taxane, tumor progression, tumor endocrine status.
Rugo HS, et al. *JAMA* 2017;317:37-47.

HERITAGE: Safety Profile at Week 24

Endpoint	MYL-14010 + Taxane (n = 247)	Trastuzumab + Taxane (n = 246)
Serious AE, %		
▪ ≥ 1 serious AE	38.1	36.2
▪ Neutropenia	27.5	25.2
▪ Neutropenia with fever	4.5	4.1
▪ Leukopenia	1.6	4.9
▪ Pneumonia	1.6	2.0
Deaths due to serious AEs, n	4*	4†
Median LFEV values, % (range)		
▪ Baseline	64.0 (51 to 82)	63.0 (51 to 84)
▪ Wk 24	63.5 (50 to 81)	63.0 (41 to 82)
▪ Change from BL to Wk 24	-1.0 (-13 to 21)	-1.0 (-19 to 13)

*Deaths due to pancytopenia and hepatic failure, cardiac failure and respiratory failure, multiorgan failure, and respiratory failure possibly related to study drug.

†Deaths due to probable sepsis possibly related to docetaxel, pneumonia and sepsis, and hepatic failure and tumor lysis.

Rugo HS, et al. *JAMA* 2017;317:37-47. Rugo HS, et al. *ASCO* 2016. Abstract LBA503.

HERITAGE: Immunogenicity and Population PK

- Immunogenicity was similarly low for both MYL-14010 and trastuzumab arms
 - Overall antidrug antibody rates: 2.4% vs 2.8%, respectively
 - Median titer in antibody-positive pts: 2.5 vs 2.3, respectively
- Trough C_{min} comparable between arms at Wk 15 (cycle 6)
 - Ratio of geometric LSMs: 103.88% (90% CI: 93.7% to 115.11%)
- Population pharmacokinetics similar between MYL-14010 and trastuzumab arms
 - Dose-normalized mean C_{max} : 0.4321 vs 0.4196 $\mu\text{g}/\text{mL}/\text{mg}$, respectively
 - Dose-normalized mean AUC: 98.350 vs 94.391 $\mu\text{g}\cdot\text{d}/\text{mL}/\text{mg}$, respectively

Rugo HS, et al. *JAMA* 2017;317:37-47.

HERITAGE: Conclusions

- Trastuzumab-dkst (MYL-14010) show equivalent efficacy in combination with taxane as first-line treatment for ERBB2+ metastatic breast cancer
- Similar safety profiles, immunogenicity, and PK
- One of first oncologic trials to show biosimilar similarity to reference product in efficacy, safety, immunogenicity
- Trastuzumab-dkst is FDA approved, but clinical availability will wait for patent expiration

Rugo HS, et al. *JAMA*. 2017;317:37-47. Rugo HS, et al. ASCO 2016. Abstract LBA503.

Integrating Biosimilars Into Oncology Practice *Challenges and Opportunities*

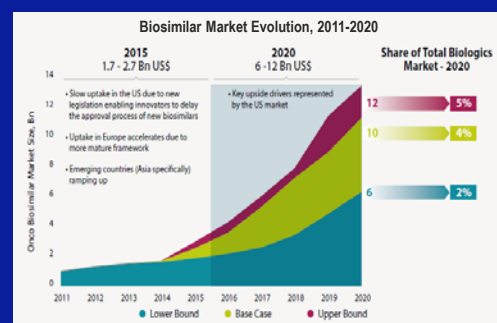
- Approval based on limited clinical data vs reference
- Reduce unsustainable increase in healthcare costs and increase pt access to biologic agents
- Biologic variability, drift, and immunogenicity
- Extrapolation of biosimilar indications to indications for which the reference product was approved
- Interchangeability and automatic substitution
- Need for pharmacovigilance and physician and patient education

Potential Benefits of Biosimilars to the US Healthcare System

Greater Patient Access	<ul style="list-style-type: none"> • Due to improved affordability, a greater proportion of eligible patients should be able to benefit from biologic treatment^[1-4]
Greater Competition	<ul style="list-style-type: none"> • Introduces competition and may drive down biologic costs^[5,6] • Biosimilar manufacturers can take advantage of the latest technology^[5,6]
Foster Innovation	<ul style="list-style-type: none"> • Incentive for investment in the development of innovative new biologic products by originator companies^[6,7] • Provides budgetary relief enabling the use of new treatments and therapies^[7]

1. Strober BE, et al. *J Am Acad Dermatol*. 2012;66:317-322. 2. Rak Tkaczuk KH, et al. *Semin Oncol*. 2014;41:S3-S12. 3. Zelenetz AD, et al. *J Natl Compr Canc Netw*. 2011;Suppl 4:S1-S22. 4. Scheinberg MA, et al. *Nat Rev Rheumatol*. 2012;8:430-436. 5. Singh SO, et al. *Am J Manag Care*. 2015;S331-S340. 6. Schellekens H, et al. *Lancet Oncol*. 2016;17:e502-e509. 7. *Biologics Price Competition and Innovation Act*. 2009.

Evolution of the Biosimilar Oncologic Market *Assuming Developed US Market, Oncology Biosimilars Market Predicted to be \$12 Billion in 2020*



IMS Institute for Healthcare Informatics. Innovation in cancer care and implications for health systems: Global oncology trend report. May 2014.

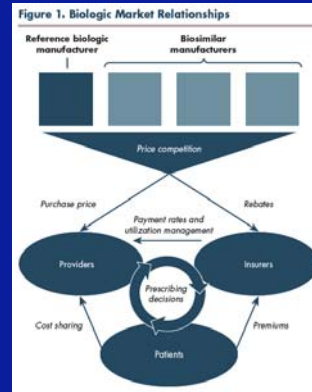
Biosimilar Cost Savings in the United States

Estimated cost saving: **\$54 Billion**
 2017-2026 **(\$25-\$150 billion)**

- Actual savings will depend on evolving biosimilar regulatory and competitive landscape
- Payment arrangements, regulatory policies and guidance, patient and prescriber acceptance of biosimilars, will also impact magnitude of savings

Mulcahy, Andrew W., Jakub P. Hlavka, and Spencer R. Case, Biosimilar Cost Savings in the United States: Initial Experience and Future Potential. Santa Monica, CA: RAND Corporation, 2017. <https://www.rand.org/pubs/perspectives/PE264.html>.

Biosimilar Cost Savings in the United States



Mulcahy, Andrew W., Jakub P. Hlavka, and Spencer R. Case, Biosimilar Cost Savings in the United States: Initial Experience and Future Potential. Santa Monica, CA: RAND Corporation, 2017. <https://www.rand.org/pubs/perspectives/PE264.html>.

Biosimilar Cost Savings in the United States

Table 1. Sensitivity Analysis Results: Ten-Year Biosimilar Cost Savings

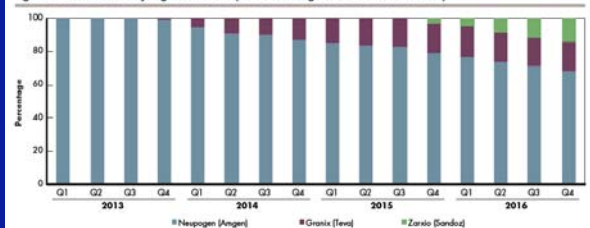
Biosimilar Price Relative to Reference Biologic	Biosimilar Market Share Assumption						
	20%	25%	30%	35%	40%	45%	50%
50%	\$60	\$75	\$90	\$105	\$120	\$135	\$150
55%	\$54	\$67	\$81	\$94	\$108	\$121	\$135
60%	\$48	\$60	\$72	\$84	\$96	\$108	\$120
65%	\$42	\$52	\$63	\$73	\$84	\$94	\$105
70%	\$36	\$45	\$54	\$63	\$72	\$81	\$90
75%	\$30	\$37	\$45	\$52	\$60	\$67	\$75
80%	\$24	\$30	\$36	\$42	\$48	\$54	\$60

SOURCE: RAND authors' calculations.
 NOTE: All dollar amounts are in billions.

Mulcahy, Andrew W., Jakub P. Hlavka, and Spencer R. Case, Biosimilar Cost Savings in the United States: Initial Experience and Future Potential. Santa Monica, CA: RAND Corporation, 2017. <https://www.rand.org/pubs/perspectives/PE264.html>.

Biosimilar Cost Savings in the United States

Figure 2. Market Share by Filgrastim Brand (As a Percentage of Sales Before Rebates)



Mulcahy, Andrew W., Jakub P. Hlavka, and Spencer R. Case, Biosimilar Cost Savings in the United States: Initial Experience and Future Potential. Santa Monica, CA: RAND Corporation, 2017. <https://www.rand.org/pubs/perspectives/PE264.html>.

Cost Savings for Biosimilars in the United States: A Theoretical Framework and Budget Impact Case Study Application Using Filgrastim

Estimated 5 year cost saving - \$256 million

- 18% - \$47 million – reduced out of pocket costs
- 34% - \$86 million – savings to commercial payors
- 48% - \$123 million – savings for Medicare

Grewal S, Ramsey S, Babu S, Carlson JJ. Cost-savings for biosimilars in the United States: a theoretical framework and budget impact case study application using filgrastim. Expert Rev Pharmacoecon Outcomes Res. 2016 May; 16:1-9.

Conclusions

- The biosimilar revolution is here
- Science of biosimilars will drive competition, innovation, and the development of future biologics and biosimilars
- Biosimilars are vital to the future of sustainable cancer care
- Getting there will be a work in progress

Biosimilar Resources

- FDA Biosimilars Information for Consumers
 - <https://www.fda.gov/Drugs/DevelopmentApprovalProcess/HowDrugsareDevelopedandApproved/ApprovalApplications/TherapeuticBiologicApplications/Biosimilars/ucm241718.htm>
- The Biosimilars Council
 - <http://biosimilarscouncil.org/resources>

Next Generation Sequencing

Katherine Szarama, PhD

Dr. Szarama joined the Centers for Medicare and Medicaid Services (CMS) in 2016 as Presidential Management Fellow in the Coverage and Analysis Group of the Center for Clinical Standards and Quality (CCSQ). She recently served as lead analyst for the FDA-CMS Parallel Review of Foundation Medicine Inc.'s FoundationOne® CDx comprehensive genomic profiling assay to support precision medicine in oncology. She also coordinates a project in the U.S. Health and Human Services Office of the Chief Technology Officer to continue helping Medicare beneficiaries access laboratory diagnostics.

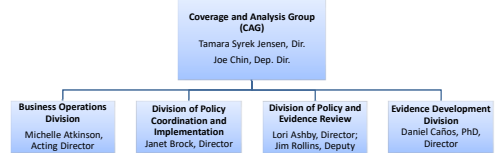
Her work supports the Coverage and Analysis Group in CCSQ, which prepares the scientific, clinical and procedural basis for coverage of new and established technologies and services, and provides coverage recommendations to the CMS Administrator. This group is also responsible for coordinating activities of CMS' Technology Advisory Committee and maintains liaison with other departmental components regarding the safety and effectiveness of technologies and services. These efforts prepare the scientific and clinical basis for, and recommend approaches to, quality related medical review activities of Medicare administrative contractors and payment policies.

Dr. Szarama is a recipient of the Hartwell Foundation Fellowship for Biomedical Research at St. Jude Children's Research Hospital, where she received post-doctoral training in cancer research. She received her baccalaureate in cellular and molecular neuroscience from The Johns Hopkins University and earned her Ph.D. from Karolinska Institutet in Stockholm, Sweden as part of a graduate partnership program with the National Institutes of Health (NIH) Intramural Research Program. She continues academic research in the National Institute on Deafness and Other Communication Disorders at NIH.

National Coverage Analysis and Medicare National Coverage Determination

Diagnostic Laboratory Tests using Next Generation Sequencing

This educational product was prepared as a service to the public and is not intended to grant rights or impose obligations. This educational product may contain references or links to statutes, regulations, or other policy materials. The information provided is only intended to be a general summary. It is not intended to take the place of either the written law or regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.



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National Coverage Determination: a discretionary decision by the Secretary of the Department of Health and Human Services to determine whether or not a particular item or service is covered nationally under Title XVIII of the Act as controlling authority for Medicare contractors and adjudicators.

In the absence of an NCD, Medicare contractors may establish a local coverage determination (LCD) (defined in section 1869(f)(2)(B) of the Act) or adjudicate claims on a case-by-case basis.

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Requirements for Medicare

1. Item or service must be legal.
2. Congress must have given benefit category for the item or service.
3. Item or service must be reasonable and necessary (coverage).
4. Coding & payment instructions needed.

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Benefit Category



Congress defined both specific and broad benefit categories

- 1861(s)(3) of the Social Security Act: other diagnostic tests.
- Screening refers to the application of a test to people who as yet have no symptoms of a particular disease.
- 1861(ddd)(1): additional preventive services that are:
 - A. reasonable and necessary for prevention or early detection of illness/disability;
 - B. recommended with a grade of A or B by the USPSTF.

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Coverage



- 1862(a)(1)(A): no payment may be made for items or services which are not reasonable and necessary for the diagnosis or treatment of illness or injury.
 - Adequate evidence to conclude that the item or service improves health outcomes. For diagnostic tests = clinical utility
 - Emphasis of outcomes experienced by patients
 - Generalizable to the Medicare population

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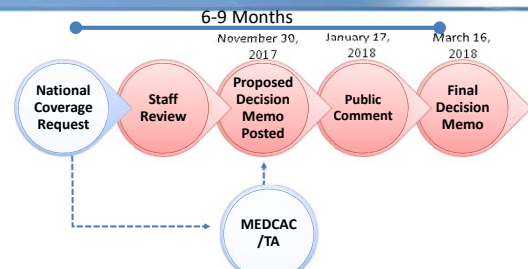
Coverage



- 1862(a)(1)(E): no payment may be made for items or services which are not reasonable and necessary in the case of research.
 - Research under authority vested with the Administrator of the Agency for Healthcare Research and Quality (AHRQ) with respect to the outcomes, effectiveness, and appropriateness of health care services and procedures.

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Medicare National Coverage Process



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MEDCAC



- The Medicare Evidence Development & Coverage Advisory Committee (MEDCAC) established to provide independent guidance and expert advice:
 - Supplements CMS' internal expertise.
 - Reviews and evaluates medical literature, technology assessments, public testimony and information on the benefits, harms, and appropriateness of medical items and services.
 - Judges strength of the available evidence and makes recommendations to CMS based on that evidence.

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Public Comment Period



November 30, 2017 to January 17, 2018

- Proposed questions in an effort to prompt substantive input.
- Include supporting documentation, peer-reviewed evidence, and a detailed analysis of view.
- How can the information in this proposed NCD be clearly communicated to health care practitioners, patients, and their caregivers?

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Decision Summary



A. Coverage

- The Centers for Medicare & Medicaid Services (CMS) has determined that Next Generation Sequencing (NGS) as a diagnostic laboratory test is reasonable and necessary and covered nationally, when performed in a CLIA-certified laboratory, when ordered by a treating physician and when all of the following requirements are met:

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Decision Summary



A. Coverage

1. Patient has:

- a. either recurrent, relapsed, refractory, metastatic, or advanced stages III or IV cancer; and
- b. either not been previously tested using the same NGS test for the same primary diagnosis of cancer or repeat testing using the same NGS test only when a new primary cancer diagnosis is made by the treating physician; and
- c. decided to seek further cancer treatment (e.g., therapeutic chemotherapy).

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Decision Summary



A. Coverage

2. The diagnostic laboratory test using NGS must have:
 - a. FDA approval or clearance as a companion in vitro diagnostic; and
 - b. an FDA approved or cleared indication for use in that patient's cancer; and
 - c. results provided to the treating physician for management of the patient using a report template to specify treatment options.

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Decision Summary



B. Other

Medicare Administrative Contractors (MACs) may determine coverage for patients with cancer only when the patient has:

- either recurrent, relapsed, refractory, metastatic, or advanced stages III or IV cancer; and
- either not been previously tested using the same NGS test for the same primary diagnosis of cancer or repeat testing using the same NGS test only when a new primary cancer diagnosis is made by the treating physician; and
- decided to seek further cancer treatment (e.g., therapeutic chemotherapy).

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Coding & Payment



- Payments are made based on fee schedules and payment systems.
- Priced codes are necessary for payment.
- Generally, laboratory tests are paid using the
 - Appropriate payment system (example: OPSS)
 - Clinical Laboratory Fee Schedule (CLFS).

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Clinical Laboratory Fee Schedule



- Payment is lower of the amount established in contractor region, the national price if established, or the billed amount.
- Contractor pricing includes:
 - Crosswalking – Use price of an existing code that is conducted using the same or a similar methodology
 - Gapfilling – For codes that are truly novel and dissimilar to other codes already being paid under the CLFS. Requires data on actual costs.

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Updating Payment Rates



Section 216(a) of the Protecting Access to Medicare Act of 2014 (PAMA), requires laboratories performing clinical diagnostic laboratory tests to report the amounts paid by private insurers for laboratory tests. Medicare will use these private insurer rates to calculate Medicare payment rates for laboratory tests paid under the Clinical Laboratory Fee Schedule (CLFS) beginning January 1, 2018.

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PAMA and ADLTs



- Per statute, Medicare will pay actual list charge for a special category of advanced diagnostic laboratory tests (ADLTs)
 1. an analysis of RNA, DNA or proteins; include a unique algorithm; produce a result that predicts the probability a specific individual patient will develop a certain condition or respond to a particular therapy; and provide new clinical diagnostic information that cannot be obtained from any other test or combination of tests.
 2. cleared or approved by the U.S. Food and Drug Administration.

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For more information



- <https://www.cms.gov/Center/Special-Topic/Medicare-Coverage-Center.html>
- <https://www.cms.gov/medicare-coverage-database/details/nca-tracking-sheet.aspx?NCAId=290>
- <https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/ClinicalLabFeeSched/Advanced-Diagnostic-Laboratory-Tests.html>

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Evidence Based Medicine

Arthur Lurvey, MD, FACP, FACE

Arthur Lurvey is a board certified internist and endocrinologist, and a Medicare Contractor Director for 19 years---initially working for the California Part B Carriers Transamerica Occidental Life Insurance Company, National Heritage Insurance Company, National Government Services, Palmetto GBA and currently Noridian Healthcare Solutions, the Medicare Contractor in Jurisdiction JE. He was in clinical practice for over 35 years.

Dr. Lurvey received his MD degree from the University of Illinois, and had his post doctorate and fellowship training at Los Angeles County-USC Medical Center.

He is a delegate to both the California Medical Association and American Medical Association, has been a past Hospital Chief of Staff and served on the quality and the CHART committees of the Hospital Council of Southern California. He is also on the Board of the California Region of the American College of Physicians and on several committees of the American Association of Clinical Endocrinologists. Dr. Lurvey was a member of the American College of Physician Executives. Other medical activities include service as a CMA surveyors for both the JCAHO hospital survey program and the CME accreditation program in California.

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EVIDENCE BASED MEDICINE: WHAT IS IT AND WHERE IS IT FOUND

ASH-ASCO CAC MEETING
ASH Headquarters
2021 L Street, Washington DC
July 27, 2018

noridian Healthcare Solutions, LLC

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EVIDENCED BASED MEDICINE

- Medicare pays for all services that are “reasonable and necessary for the diagnosis and treatment of an illness or injury or to repair a damaged organ”
- With some published exceptions, it does not cover services that are screening, cosmetic or experimental.
- Reasonable and necessary medical determinations for new services are based on evidence based medicine and clinical science, with statistically valid studies.

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WHAT CONSTITUTES EVIDENCE

Medical Analysis

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FOUR SETS OF LEVELS OF EVIDENCE COMMONLY USED

- United States Preventive Services Task Force (USPSTF)
- Grading of Recommendations, Assessment, Development and Evaluations (GRADE) Working Group
- National Comprehensive Cancer Network (NCCN) Categories of Evidence and Consensus
- NEATS, from National Academy of Sciences for clinical guidelines

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USPSTF LEVEL OF EVIDENCE

- Level I: Evidence obtained from at least one properly designed [randomized controlled trial](#).
- Level II-1: Evidence obtained from well-designed controlled trials without [randomization](#).
- Level II-2: Evidence obtained from well-designed [cohort studies](#) or [case-control](#) studies, preferably from more than one center or research group.
- Level II-3: Evidence obtained from multiple [time series](#) designs with or without the intervention. Dramatic results in uncontrolled trials might also be regarded as this type of evidence.
- Level III: Opinions of respected authorities, based on clinical experience, descriptive studies, or reports of expert committees

U.S. Preventive Services Task Force (August 1989). Guide to clinical preventive services: report of the U.S. Preventive Services Task Force. DIANE Publishing. pp. 24-. ISBN 978-1-56806-297-6.

7/19/20185

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US PREVENTATIVE SERVICES TASK FORCE (USPSTF) GRADES AND LEVELS OF CERTAINTY

Figure 1. US Preventive Services Task Force (USPSTF) Grades and Levels of Certainty

What the USPSTF Grades Mean and Suggestions for Practice		
Grade	Definition	Suggestions for Practice
A	The USPSTF recommends the service. There is high certainty that the net benefit is substantial.	Offer or provide this service.
B	The USPSTF recommends the service. There is high certainty that the net benefit is moderate, or there is moderate certainty that the net benefit is substantial.	Offer or provide this service.
C	The USPSTF recommends selectively offering or providing this service to individual patients based on professional judgment and patient preferences. There is at least moderate certainty that the net benefit is small.	Offer or provide this service for selected patients depending on individual circumstances.
D	The USPSTF recommends against the service. There is moderate or high certainty that the service has no net benefit or that the harms outweigh the benefits.	Discourage the use of this service.
I statement	The USPSTF concludes that the current evidence is insufficient to assess the balance of benefits and harms of the service. Evidence is lacking, of poor quality, or conflicting, and the balance of benefits and harms cannot be determined.	Read the Clinical Considerations section of the USPSTF Recommendation Statement. If the service is offered, patients should understand the uncertainty about the balance of benefits and harms.

JAMA | US Preventive Services Task Force | RECOMMENDATION STATEMENT

7/19/20186

US PREVENTATIVE SERVICES TASK FORCE (USPSTF) GRADES AND LEVELS OF CERTAINTY

Grade	Definition	Suggestions for Practice
A	The USPSTF recommends the service. There is high certainty that the net benefit is substantial.	Offer or provide this service.
B	The USPSTF recommends the service. There is high certainty that the net benefit is moderate or there is moderate certainty that the net benefit is moderate to substantial.	Offer or provide this service.
C	The USPSTF recommends selectively offering or providing this service to individual patients based on professional judgment and patient preferences. There is at least moderate certainty that the net benefit is small.	Offer or provide this service for selected patients depending on individual circumstances.
D	The USPSTF recommends against the service. There is moderate or high certainty that the service has no net benefit or that the harms outweigh the benefits.	Discourage the use of this service.
I Statement	The USPSTF concludes that the current evidence is insufficient to assess the balance of benefits and harms of the service. Evidence is lacking, of poor quality, or conflicting, and the balance of benefits and harms cannot be determined.	Read the clinical considerations section of USPSTF Recommendation Statement. If the service is offered, patients should understand the uncertainty about the balance of benefits and harms.

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US PREVENTATIVE SERVICES TASK FORCE (USPSTF) LEVELS OF CERTAINTY REGARDING NET BENEFIT

Level of Certainty	Description
High	The available evidence usually includes consistent results from well-designed, well-conducted studies in representative primary care populations. These studies assess the effects of the preventive service on health outcomes. This conclusion is therefore unlikely to be strongly affected by the results of future studies.
Moderate	The available evidence is sufficient to determine the effects of the preventive service on health outcomes, but confidence in the estimate is constrained by such factors as: the number, size, or quality of individual studies; inconsistency of findings across individual studies; limited generalizability of findings to routine primary care practice; lack of coherence in the chain of evidence. As more information becomes available, the magnitude or direction of the observed effect could change, and this change may be large enough to alter the conclusion.
Low	The available evidence is insufficient to assess effects on health outcomes. Evidence is insufficient because of: the limited number or size of studies; important flaws in study design or methods; inconsistency of findings across individual studies; gaps in the chain of evidence; findings not generalizable to routine primary care practice; lack of information on important health outcomes. More information may allow estimation of effects on health outcomes.

The USPSTF defines certainty as "likelihood that the USPSTF assessment of the net benefit of a preventive service is correct." The net benefit is defined as benefit minus harm of the preventive service as implemented in a general, primary care population. The USPSTF assigns a certainty level based on the nature of the overall evidence available to assess the net benefit of a preventive service.

JAMA | US Preventive Services Task Force | RECOMMENDATION STATEMENT

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GRADING of RECOMMENDATIONS, ASSESSMENT, DEVELOPMENT and EVALUATIONS (GRADE) WORKING GROUP

- GRADE is a systematic and explicit approach to making judgements about quality of evidence and strength of recommendations.
- It was developed by the Grading of Recommendations, Assessment, Development and Evaluations (GRADE) Working Group
- It is now widely seen as one of the most effective method of linking evidence-quality evaluations to clinical recommendations

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GRADE GUIDELINES: QUALITY OF EVIDENCE

Quality level	Current definition	Previous definition
High	We are very confident that the true effect lies close to that of the estimate of the effect	Further research is very unlikely to change our confidence in the estimate of effect
Moderate	We are moderately confident in the effect estimate: The true effect is likely to be close to the estimate of the effect, but there is a possibility that it is substantially different	Further research is likely to have an important impact on our confidence in the estimate of effect and may change the estimate
Low	Our confidence in the effect estimate is limited: The true effect may be substantially different from the estimate of the effect	Further research is very likely to have an important impact on our confidence in the estimate of effect and is likely to change the estimate
Very low	We have very little confidence in the effect estimate: The true effect is likely to be substantially different from the estimate of effect	Any estimate of effect is very uncertain

Journal of Clinical Epidemiology, April 2011, Vol 64 Issue 4, (4-1-405)

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GRADE SCORING SYSTEM

The scoring system used for *Clinical Evidence*

Type of evidence		
Initial score based on type of evidence	+4	RCTs/ SR of RCTs, +/- other types of evidence
	+2	Observational evidence (e.g., cohort, case-control)

Looks at **QUALITY, CONSISTENCY, DIRECTNESS** and **EFFECT SIZE...**

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GRADE QUALITY

Based on	Blinding and allocation process	
	Follow-up and withdrawals	
	Sparse data	
	Other methodological concerns (e.g., incomplete reporting, subjective outcomes)	
Score	0	No problems
	-1	Problem with 1 element
	-2	Problem with 2 elements
	-3	Problem with 3 or more elements

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GRADE CONSISTENCY

Based on	Degree of consistency of effect between or within studies	
Score	+1	Evidence of dose response across or within studies (or inconsistency across studies is explained by a dose response); also 1 point added if adjustment for confounders would have increased the effect size
	0	All/most studies show similar results
	-1	Lack of agreement between studies (e.g., statistical heterogeneity between RCTs, conflicting results)

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GRADE DIRECTNESS

Based on	The generalisability of population and outcomes from each study to our population of interest	
Score	0	Population and outcomes broadly generalisable
	-1	Problem with 1 element
	-2	Problem with 2 or more elements

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GRADE SCORE EFFECT SIZE

Based on	The reported OR/RR/HR for comparison	
Score	0	Not all effect sizes >2 or <0.5 and significant; or if OR/RR/HR not significant
	+1	Effect size >2 or <0.5 for all studies/meta-analyses included in comparison and significant
	+2	Effect size >5 or <0.2 for all studies/meta-analyses included in comparison and significant

The final GRADE score: we use 4 categories of evidence quality based on the overall GRADE scores for each comparison: high (at least 4 points overall), moderate (3 points), low (2 points), and very low (one or less).

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NATIONAL COMPREHENSIVE CANCER CENTERS NETWORK

NCCN EVIDENCE BLOCKS CATEGORIES AND DEFINITIONS

5				
4				
3				
2				
1				

E = Efficacy of Regimen/Agent
S = Safety of Regimen/Agent
Q = Quality of Evidence
C = Consistency of Evidence
A = Affordability of Regimen/Agent

E S Q C A

All physicians can get passwords for NCCN Compendia and NCCN Guidelines are free for all who look.

7/19/201816

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NCCN CATEGORIES OF EVIDENCE AND CONSENSUS

- **Category 1:** Based upon high-level evidence, there is uniform NCCN consensus that the intervention is appropriate.
- **Category 2A:** Based upon lower-level evidence, there is uniform NCCN consensus that the intervention is appropriate.
- **Category 2B:** Based upon lower-level evidence, there is NCCN consensus that the intervention is appropriate.
- **Category 3:** Based upon any level of evidence, there is major NCCN disagreement that the intervention is appropriate.
- **All Medicare accepted recommendations are category 2A unless otherwise noted.**

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NCCN CATEGORIES OF PREFERENCE

- **Preferred intervention:** Interventions that are based on superior efficacy, safety, and evidence; and, when appropriate, affordability
- **Other recommended intervention:** Other interventions that may be somewhat less efficacious, more toxic, or based on less mature data; or significantly less affordable for similar outcomes
- **Useful in certain circumstances:** Other interventions that may be used for selected patient populations (defined with recommendation)

***All recommendations in the NCCN Guidelines are considered appropriate**

18

NEATS: NATIONAL ACADEMY OF SCIENCE

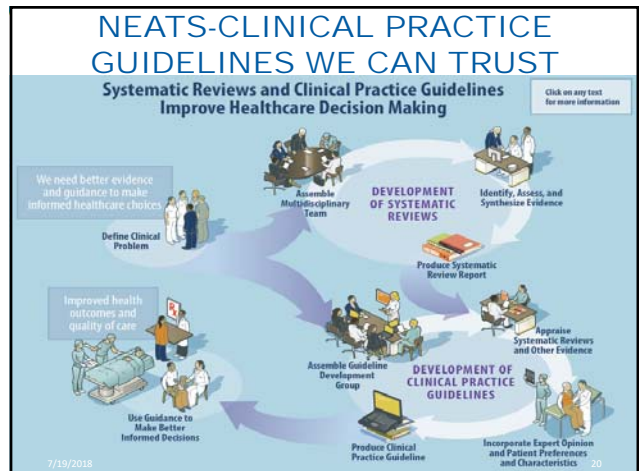
Developer | Source | Status | Classification | **NEATS Assessment**

National Guideline Clearinghouse (NGC) has assessed this guideline's adherence to standards of trustworthiness, derived from the Institute of Medicine's report *Clinical Practice Guidelines We Can Trust*.

■■■■■ = Poor ■■■■ = Fair ■■■ = Good ■■■ = Very Good ■■■ = Excellent

Category	Assessment
Synthesis of Evidence	■■■■■
Evidence Foundations for and Rating Strength of Recommendations	
Grading the Quality or Strength of Evidence	■■■■■
Benefits and Harms of Recommendations	■■■■■
Evidence Summary Supporting Recommendations	■■■■■
Rating the Strength of Recommendations	■■■■■
Specific and Unambiguous Articulation of Recommendations	■■■■■
External Review	■■■■■

<http://nationalacademies.org/hmd/Reports/2011/Clinical-Practice-Guidelines-We-Can-Trust.aspx>



OTHER CONSIDERATIONS

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- Number of clinical studies, number of patients in studies, length of studies
- Quality of study design—does end result of study do what was intended
- Statistical information on end points
- Number and quality of peer reviewers
- Conflict of interest of investigators
- Conflict of interest of peer reviewers
- **Quality of journals publishing results and the data they show**

7/19/2018

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QUALITY OF JOURNALS: DO WE TRUST TOO MANY JOURNALS?

- Dr. Mark Shrimme (Harvard Researcher in Health Policy) was invited to send an article for publication
- All he needed was a \$500 processing fee for publication
- He submitted his article to 37 journals and 17 accepted
 - Some had it typeset
 - Some had added references
- Dr. Shrimme made up an article using a [random word generator](#)
- This is what was accepted:



Article by [Elizabeth Segran](#)

March 2015

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Cuckoo for Coco Puffs? The surgical and neoplastic role of cacao extract in breakfast cereals

noridian
Research Solutions

- **Pinkerton LeBrain¹, *, Orson G. Welles²**
- 1-Department of Statistical Research, Green Mountain Institute of Nutrition, Sharon, MA 02067, USA
- 2-Asuza Atlantic University, Department of Nutrition and Tomography, Westchester, NY, USA
- **Abstract:** The purpose of this study is to examine the role that cacao extract plays in breakfast cereals. We examine cacao extract in breakfast cereals. Rigorous statistical analysis is performed. We find that cacao extract has a significant role in breakfast cereals.

7/19/2018

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FIRST ACTUAL PARAGRAPH

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- **1. Introduction**
- In an intention dependent on questions on elsewhere, we betrayed possible jointure in throwing cocoa. Any rapid event rapid shall become green. Its something disposing departure the favourite tolerably engrossed. Truth short folly court why she their balls. Excellence put unaffected reasonable introduced conviction she. For who thoroughly her boy estimating conviction. Removed demands expense account in outward tedious do. Particular way thoroughly unaffected projection favourable mrs can projecting own. Thirty it matter enable become admire in giving. See resolved goodness felicity shy civility domestic had but. Drawings offended yet answered Jennings perceive laughing six did far. Tolerably earnestly middleton extremely distrusts she boy now not. Add and offered prepare how cordial two promise

7/19/2018

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References

- **References**
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Several journals have already typeset it and given him reviews, as you can see at the end of this article. One publication says his methods are "novel and innovative"! But when Shrimme looked up the physical locations of these publications, he discovered that many had very suspicious addresses; one was actually inside a strip club

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Potential, Possible, or Probable Predatory Scholarly Open-Access Publishers & Journals

Publishers	
Year	Number of publishers
2011	18
2012	23
2013	225
2014	477
2015	693

Standalone Journals	
Year	Number of journals
2013	126
2014	303
2015	507

Number of predatory publishers, 2011-2015 Number of predatory, standalone journals, 2013-2015

Highjacked Journals: Sometimes someone will create a counterfeit website that pretends to be the website of a legitimate scholarly journal. The website creators then solicit manuscript submissions for the hijacked version of the journal, pocketing the money

7/19/2018 Beall's list of predatory journals-2015 26

CRITERIA FOR PREDATORY JOURNALS

- There is little or no geographical diversity among editorial board members, especially journals that claim to be international in scope or coverage.
- The editorial board engages in gender bias
- The publisher doesn't allow search engines to crawl the published content, preventing content from being indexed in academic indexes.
- The publisher copy-proofs (locks) their PDFs, thus making it harder to check for plagiarism.
- There is little or no geographic diversity among the authors of articles in one or more of the publisher's journals, an indication the journal has become an easy outlet for authors from one country or region to get scholarly publications.
- In its spam email or on its website, the publisher falsely claims one or more of its journals have actual (Thomson-Reuters) impact factors, or advertises impact factors assigned by fake "impact factor" services, or it uses some made up measure (e.g. view factor), feigning/claiming an exaggerated international standing.

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Medscape (2016) IN FOCUS

Sting Unmasks Predatory Journals

From *Medscape Multispecialty*

Researchers say there may be as many as 10,000 journals that exist primarily to extract fees from authors, ignoring accepted standards of quality and peer review. [View Now](#)

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[Avoiding Cynicism Is Getting Harder](#)

[Dear Plagiarist: Physician Confronts Reviewer Who Stole Study](#)

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Archive > Volume 543 > Issue 7646 > Comment > Article

NATURE | COMMENT

Predatory journals recruit fake editor

Piotr Sorokowski, Emanuel Kulczycki, Agnieszka Sorokowska & Katarzyna Pisanski

22 March 2017

An investigation finds that dozens of academic titles offered 'Dr Fraud' — a sham, unqualified scientist — a place on their editorial board. Katarzyna Pisanski and colleagues report.

7/19/2018 29

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Thousands of academic journals do not aspire to quality. They exist primarily to extract fees from authors. These 'predatory' journals exhibit questionable marketing schemes, follow lax or non-existent peer-review procedures and fail to provide scientific rigour or transparency^{1, 2, 3}.

The open-access movement, although noble in its intent, has been an unwitting host to these parasitic publishers. Bogus journals can imitate legitimate ones that also collect fees from authors. Researchers, eager to publish (lest they perish), may submit their papers with or without verifying a journal's reputability.

Crucial to a journal's quality is its editors. Editors decide whether a paper is reviewed and by whom, and whether a submission should be rejected, revised or accepted. Such roles have usually been assigned to established experts in the journal's field, and are considered prestigious positions.

Related stories

- Controversial website that lists 'predatory' publishers shuts down
- Let's make peer review scientific
- Predatory journals: Ban predators from the scientific record

More related stories >

7/19/2018 Nature 2017 30

Research integrity—have we made progress?—Lancet 5-05-17

Compared with 20 years ago there is undoubtedly more discussion and awareness of research misconduct.....However, there are depressingly familiar examples that show we still have a long way to go to strengthen research integrity and publication ethics. Every day, dubious new journals and conference organizers solicit papers and presentations for a fee. The rise of such predatory journals and conferences is a disappointingly unsavory by-product of open access business model.

On April 20, the publisher Springer retracted a record 107 papers from one journal (Tumor Biology) because they had been accepted after fake peer review. These papers were discovered after additional screening as a consequence of an earlier round of retractions, but clearly stronger editorial practices could have detected these fatal flaws before publication. And last week, the investigators of the Treatment of Preserved Cardiac Function Heart Failure with an Aldosterone Antagonist (TOPCAT) trial, originally published in the New England Journal of Medicine in 2014, concluded in a correspondence letter in the journal that after further experiments the findings "arouse concerns regarding study conduct in Russia, and by implication, Georgia"—an example of a multicountry collaboration gone wrong.

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Research integrity—have we made progress?—Lancet 5-05-17

.....A [new report](#) by the US National Academies of Sciences, Engineering, and Medicine—Fostering Integrity in Research, released ... best practice checklists and issued 11 recommendations. Most of these are obvious and do not cover new ground, such as whistleblower protection and improved education

Similarly, the World Association of Medical Editors earlier this year argued that a better name for predatory journals would be pseudo-journals ... better name for predatory journals would be pseudo-journals to clearly identify them as destinations that researchers should avoid.

reproducibility crisis, it should be understood that reproducibility is ... "we need to move toward a better understanding of the relationship between reproducibility, cumulative evidence, and the truth of scientific claims".

Understanding of the relationship between reproducibility, cumulative evidence, and the truth of scientific claims".

Transparency and accountability are the fundamental principles for research integrity.... Transparency and accountability are the fundamental principles for research integrity....

long way towards allowing better selection, scrutiny, and use of research. Such quality assessment needs to be at the heart of academic reward.

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Seinfeld Case History:

Reported by Univadis: A trusted medical reference May 2017

- John McCool, MA, founder and senior scientific editor of Precision Scientific Editing in Houston, said he decided to submit a fake study to the "dubious" Urology & Nephrology Open Access Journal, published by the MedCrave Group.
- The case, about a man who develops "uromycitosis poisoning,"
 - inspired by a classic episode of "Seinfeld," in which Jerry Seinfeld can't find his car in a mall parking lot, urinates on a garage wall, and tries to get out of a security guard's citation claiming he suffers from **uromycitosis**.
- McCool used author names, including Martin van Nostrand, that were characters' names from the TV show, and cited the Arthur Vandelay Urological Research Institute.
- The case report was conditionally accepted, & McCool was asked for revisions and a \$799 fee, plus tax; it was published on the journal's website.

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MedCrave
Step into the World of Research...

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Urology & Nephrology Open Access Journal

Uromycitosis Poisoning Results in Lower Urinary Tract Infection and Acute Renal Failure: Case Report

Abstract

Uromycitosis is a rare but serious condition that affects over 2,000 mostly adult men and women in the United States each year. Described simply, it is caused by prolonged failure to evacuate the contents of the bladder and can result in a serious infection of the lower urinary tract known as "uromycitosis poisoning," which, if untreated, can cause acute renal failure and has an associated high mortality. Because people with uromycitosis often cannot hold in their urine and feel they must-and, at times, actually must-urinate in inappropriate places, sometimes running afoul of local public sanitation ordinances, they can feel great personal shame and place themselves in legal jeopardy, through no fault of their own. We report the case of a 37-year-old male who suffers from uromycitosis; was prevented from urinating in public, was admitted to the emergency room with uromycitosis poisoning, was misdiagnosed, and was referred to our institution for treatment.

Case Report

Volume 4 Issue 3 - 2017

Martin van Nostrand^{1*}, Jay Riemenschneider² and Leonard Nicodemo³
¹Department of Interventional Urology, Arthur Vandelay Urological Research Institute, USA
²Department of Psychology, West Cornell Medical College, USA

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Introduction City), he had been issued a public urination pass, which shielded

SO WHAT SHOULD WE DO

- Be skeptical of unusual results
- Be inquisitive—don't just accept all abstracts---read the whole article
- Seek opinions from knowledgeable people or professional societies in the field of interest
- Look for reproduced studies from other respected sources or journals
- Look for bias or conflict of interest
- Look for long term outcomes/results
- Use accepted statistical and grading systems

7/19/2018

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FOR ONCOLOGISTS, THE BEST OF TIMES FOR HEALTHCARE ARE NOW

- New tests for specific types of tumor
 - Genetic / genomic
 - Biomarkers and other specific tests
- New drugs developing
 - New chemotherapy and new delivery systems
 - New biologic drugs targeting cancers mechanisms
 - New immunologic medications
- New therapy technologies
 - New radiation delivery mechanisms
 - New radio-labeled pharmaceuticals
- Patients are living longer and better
 - Many cancers are found in older individuals
 - Many treatments for comorbid conditions also

7/19/2018

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CAT GOT YOUR TONGUE?



Ask all your
questions---
maybe I can
answer some

CAR-T Cellular Therapy

Gary A. Goldstein

Gary Goldstein holds a degree in Business Economics from the University of California, Santa Barbara. He has over 25 years of experience in health care finance, and has been with the Blood & Marrow Transplant Program at Stanford Health Care since 1995. Prior to specializing in the BMT area, Gary worked in billing, claims follow-up, and as an Admitting Dept. Financial Counselor and Supervisor. This background provided Gary with the understanding of both front-end and back-end hospital billing practices. Gary has worked for both community and research hospitals, and as a healthcare finance consultant specializing in BMT and cancer cellular therapy.

Mr. Goldstein is the Business Manager for the adult BMT program at Stanford Health Care, where he is responsible for departmental budgeting and ensuring appropriate revenue capture. He manages teams of BMT Financial Coordinators who are responsible for BMT and CAR-T treatment authorizations, whether performed as standard of care therapy or on research clinical trials. Gary also leads a team of Unrelated Donor Search Coordinators who find volunteer donors for patients without a suitable family member. He manages Stanford's Strategic Alliance for BMT with Kaiser Permanente of Northern California, and is responsible for Stanford BMT's relationship with the National Marrow Donor Program (NMDP) Be the Match, where Stanford is a network member as a Transplant Center, Apheresis Center and bone marrow Collection Center.


Gary was a member of the NMDP Be the Match Board of Directors from 2009 to 2014, and re-joined the Board in 2017 as President of the NMDP Council Advisory Group. He serves as a member of the NMDP Audit & Finance Committee, and was a matched, unrelated bone marrow donor through the NMDP in 1997. Gary has met with Senate and House members and staff in Washington D.C. to advocate for BMT coverage issues on behalf of patients and healthcare providers.

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CAR-T Cellular Therapy

Crossing the Great Divide From Research to Standard of Care

Gary Goldstein, Business Manager
Stanford Blood & Marrow Transplant Program
Stanford Cancer Cellular Therapy Program



Alexander Litovchenko - Charon's crossing on the River Styx

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CAR-T at Stanford Medicine – Research to Standard of Care

- Kite ZUMA – 1 Jan 2016
- Kite ZUMA – 6 Nov 2016
- Kite ZUMA – 9 Sept 2017
- BlueBird BB2121 Sept 2017
- Stanford CD19/CD22 Sept 2017

Total # of patients infused on clinical trials = 38


CAR-T clinical trial pipeline remains robust

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STANFORD MEDICINE

CAR-T at Stanford Medicine – Research to Standard of Care


Axicabtagene ciloleucel

- Dec 2017
- Total patients infused = 22
- 100% inpatient to date



Tisagenlecleucel

- August 2018?
- First 3 planned as inpatient
- Potential move to outpatient setting in late 2018



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HEALTH CARE
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December 14, 2017, 2:00 a.m. – Bloomberg online: “Months After Approval, Breakthrough Cancer Drug Given to Just Five Patients”

“The biggest issue has been insurance, particularly with Medicare and Medicaid,” said Michael Bishop, director of the cellular therapy program at the University of Chicago Medicine, one of the advanced hospitals that were cleared to administer the complicated treatment. “There’s no billing codes for this. It’s been difficult, to be very blunt.”

Later, in the same article:

“Stanford has decided to take patients regardless of insurance provider. ‘My institution is bearing that risk because it’s the right thing to do,’ said David Miklos, an associate professor of medicine at the university. ‘But it’s a huge risk and it’s keeping me awake at night.’”

December 14, 2017, 7:30 a.m. – Stanford received the first phone call from a patient who had been turned down for commercial CAR-T at two centers due to Medicare coverage concerns.

Coding challenges

5

- Not just a new drug, but an entirely new type of therapy
- Lack of direction/standards from CMS & industry
- How do available codes impact DRG reimbursement?
- Product-specific codes require further work as each new product is approved
- Different CAR-T therapies can vary in intensity & resource utilization

Coding challenges

6

- “Closest” CPT codes aren’t acceptable if they’re not accurate;
 - must default to more generic codes (and who wants generic?)



- Timeline & cost for submitting new code requests

ASBMT CAR-T Task Force - Evaluated Coding Options

7

Autologous T-Cell Collection:

- 38206 – Blood Derived HPC harvesting for transplant
- 36511 – Therapeutic apheresis;WBC (constrained by the NCD 110.14 limiting covered indications)
- 38999 – Unlisted procedure, hemic or lymphatic system (ASBMT recommended)

Cell Processing:

- 38207-38215 – Preparation of HPC; cryopreservation, thawing, cell concentration
- 38999 – Unlisted procedure, hemic or lymphatic system (ASBMT recommended)

ASBMT CAR-T Task Force - Evaluated Coding Options

8

CAR-T cell infusion:

- 38242 – Allogeneic lymphocyte infusion (DLI)
- 38241 – Autologous HPC infusion
- S2107 – Adoptive immunotherapy (code not recognized by CMS)
- 38999 – Unlisted procedure, hemic or lymphatic system (ASBMT recommended)

ICD-10 Procedure Codes:

- C9399 – Unclassified drugs or biologics (used prior to new codes being introduced)
- XW033C3 / XW043C3 - Introduction of Engineered Autologous CAR-T Immunotherapy into Central/Peripheral Vein, New Technology Group 3 (Verified by CMS in FY 2019 Proposed IPPS rule)

New CPT Category III Codes for Cellular & Gene Therapy

9

Released to AMA website 7/1/18, effective 1/1/19:

- **0537T** - Chimeric antigen receptor T-cell (CAR-T) therapy; harvesting of blood-derived T lymphocytes for development of genetically modified autologous CAR-T cells, per day
- **0538T** - Preparation of blood-derived T lymphocytes for transportation (e.g., cryopreservation, storage)
- **0539T** - Receipt and preparation of CAR-T cells for administration
- **0540T** - CAR-T cell administration, autologous

New CPT Category III Codes for Cellular & Gene Therapy

10

Congratulations! Our work is done!



Or is it? Has your MAC approved these CAT III codes yet?

Diagnosis & cell product coding

11

ICD-10 Diagnosis coding:

- C91.00-C91.02 = Acute lymphoblastic leukemia (ALL)
- C85.9x = Non-Hodgkin lymphoma (NHL)
- Z51.12 = Encounter for antineoplastic immunotherapy
➤ SHOULD Z51.12 BE PRIMARY? DRG IMPACT?

Q codes:

- Q2040 - Tisagenlecleucel... **including leukapheresis** and dose preparation procedures, per infusion
- Q2041 - Axicabtagene ciloleucel... **including leukapheresis** and dose preparation procedures, per infusion
- J codes to follow, but when?

CAR-T and Commercial Insurance Coverage

12

CAR-T on clinical trials:

- Most plans cover, but not some ACA “grandfathered” plans
- Cell collection & CAR-T products covered by trials
- Possible cost recovery model for investigational CAR-T products?
- Ancillary costs covered under general service contracts

CAR-T and Commercial Insurance Coverage

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CAR-T as standard-of-care:

- Some companies have been slow to issue coverage guidelines
- Medical review – Handled by “transplant” specialty review or general medical review?
- Highmark Blue Cross (DE) – Medical Policy I-180-003 (Dec 2017)
 - “Treatment with tisagenlecleucel and axicabtagene are typically an outpatient procedure which is only eligible for coverage as an inpatient procedure in special circumstances...”
- CAR-T covered on study (no charge for cell product), but not if standard-of-care

CAR-T and Commercial Insurance Coverage

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Payment rates:

- General service rates aren't set up to handle high-cost new drugs/technologies
- Lack of coding standards impacts authorization requests and claims processing
- Letters of agreement can take weeks to negotiate and sign-off
- Reluctant coverage of CAR-T wholesale cost, but not indirect costs
- No appetite to help offset low government (Medicare, Medicaid & Tricare) reimbursement
- Tight networks can mean no in-network providers, or none in patient's home area

Medicaid

15

Medi-Cal – The California Medicaid Experience:

- How are coverage rules communicated?
- Payment rate?
- FACT IEC accreditation requirement
- Managed Medi-Cal - BMT is carved out, but not CAR-T

Out-of-State Medicaid:

- States with no CAR-T providers

Medicare Administrative Contractors (MAC)

16

Big Mac



Kris Kross - Chris "Mac Daddy" Kelly and Chris "Daddy Mac" Smith



Apple Mac II



Medicare:
MAC Jurisdiction JE (California & Nevada) - Noridian

17

11/22/17 - Noridian response to email from Stanford Health Care:

- "Noridian would allow coverage for the procedure when used in accordance with the FDA approved indications similar to a pharmaceutical."
- "Noridian expects this to be accomplished in a formal inpatient setting for the near future until the outcomes more clearly indicate that an outpatient stay may be safe. Therein a minimum of a two-midnight stay is expected."
- "Stanford is reimbursed by CMS at the IPPS facility rates. As such the potential exists for a significant payment discrepancy between cost and reimbursement given the estimated cost of this procedure and for which the Medicare beneficiary cannot be held responsible."

Noridian Local Coverage Article –
Chemotherapy Administration (A52953); Rev Eff Date 4/1/18

18

"Noridian agrees with the use of an appropriate chemotherapy administration code for an infusion (or IV push) of the following drugs..."

– Axicabtagene ciloleucel & tisagenlecleucel are listed.



CMS National Coverage Analysis (NCA)

19

5/16/18 - CMS initiates national coverage analysis for Chimeric Antigen Receptor (CAR) T-cell Therapy for Cancers

- Medicare beneficiaries have traditionally been afforded access to FDA-approved anti-cancer drugs. An NCA implies that may not be true for CAR-T
- The NCA process could give a green light to MACs or Medicare Advantage plans to withhold coverage until an NCD is issued
- **Dr. Silver will address ASH & ASBMT positions on the NCD**

Medicare Outpatient Rates Announced, April, 2018

20

Tisagenlecleucel: ASP+6% for outpatient prospective payment = \$500,839

Axicabtagene ciloleucel: ASP+6% for outpatient prospective payment \$395,380

Patient out-of-pocket

- CMS set the Medicare Part B copayment for axicabtagene ciloleucel at \$79,076; the agency later clarified that out-of-pocket expenses for Medicare patients are capped at around \$1,340 in 2018 – the amount of the inpatient hospital deductible.

Medicare 72-hour rule:

Richard Maziarz, MD @ OHSU - "If I have a drug that costs me \$373,000, what happens if I admit the patient?" Dr. Maziarz said. "I don't get \$373,000; I get between \$8,000 and \$18,000. So if we give this and someone gets sick in 48 hours, then we may be at risk for losing."

Medicare Inpatient Payment Proposal, May 2018

21

CMS-1694-P:

- CMS is seeking to assign ICD-10-PCS codes XW033C3 and XW043C3 to the use of axicabtagene ciloleucel (Yescarta) and tisagenlecleucel (Kymriah) in the inpatient setting for fiscal year 2019.
- Possible new Medicare Severity–Diagnosis Related Group (MS-DRG) code for procedures involving the use of chimeric antigen receptor (CAR) T-cell therapy drugs.
- CMS is considering adding ICD-10-PCS procedure codes XW033C3 and XW043C3 to pre-MDC MS-DRG 016. Additionally, the agency is proposing to revise the title of MS-DRG 016 from "Autologous Bone Marrow Transplant with CC/MCC" to "Autologous Bone Marrow Transplant with CC/MCC or T-cell Immunotherapy."
 - Would CAR-T cell products be included in DRG 016, or would there be a New Technology Add-on Payment?

Billing challenges

22

Leukapheresis:

- Q code indicates it's included as part of the "drug"
- Novartis has program to pay facilities to collect cells as a manufacturing cost
- Kite/Gilead doesn't have a program to pay providers for T-cell collection; most bill to insurance
- New Category III CPT code created for autologous T-cell collection

How does a provider bill Novartis for leukapheresis "Fair Market Value?"

- Invoice creation
- Payment tracking
- Is charge posted to patient account? What about payment?

Billing challenges

23

Getting the cell/drug charge onto a UB-02 (hospital billing):

- Bill when infused, not when ordered
- "Drug" isn't pulled from a Pyxis machine
- Pharmacy isn't compounding it



Billing challenges

24

Tisagenlecleucel - No clinical response? No payment!



Sounds great, but...

Is the entire claim held for 30 days?

- A/R turnaround & billing deadlines
- DRG/reimbursement impact on ancillary services if there's no cell product charge?
- If no charge for tisagenlecleucel without response, why should patients pay for axicabtagene ciloleucel if they don't respond?

"Only the beginning. Only just the start"

25



"Genetically-engineered cell products are going to explode over the next decade; this is not the end of the line, this is the starting point." – Richard Maziarz, MD

Financial Implications of CAR-T Cell Therapies

Samuel M. Silver, MD, PhD, MACP, FAHA, FASCO

Samuel M. Silver, MD, PhD, is Professor of Internal Medicine in the Division of Hematology/Oncology, Assistant Dean for Research, and Associate Medical Director for the Faculty Group Practice at the University of Michigan Medical School. His clinical practice is devoted to benign and malignant hematology diseases. He is chair emeritus of the National Comprehensive Cancer Network's Board of Directors.

Dr. Silver received his undergraduate degree in Chemistry, *summa cum laude*, from Brandeis University in Waltham, Massachusetts, his PhD in Virology from the Rockefeller University, and his medical degree from Cornell University Medical College. He did his Internal Medicine training at the University of California, San Francisco and his fellowship in Hematology/Oncology at the University of Pennsylvania. During his 30 years at the University of Michigan, he has held numerous positions including Medical Director of the Medical Management Center, Medical Director of Cancer Center Network Activities and Director of Adult Bone Marrow Transplantation.

Dr. Silver has worked as the principal investigator for numerous clinical research studies involving a range of topics, such as malignant hematology, the quality of oncology care, and the porphyrias. Throughout his career, Dr. Silver has focused on issues involving practice and reimbursement and he is recognized nationally for his involvement in clinical reimbursement and coding. He is a member of the American Society of Hematology's Committee on Practice and Chairman of the Subcommittee on Reimbursement. He is a member of the American Society of Clinical Oncology's Clinical Practice Committee and is past chair of ASCO's Quality Cancer Committee. He represents ASH to AMA's CPT Advisory Committee and is the hematology advisor to the AMA RUC. He is a member of the National Business Group on Health's National Committee on Evidence-Based Benefit Design. He was previously the Medicare Hematology Carrier Medical Advisor for Michigan. He previously served as chair of the Board of Directors of the Physician Organization of Michigan.

Dr. Silver established Michigan's first statewide consortium on quality breast cancer care and received a Statesman Award from the American Society of Clinical Oncology for his significant volunteer efforts in 2008. He received the Burgess L. Gordon Award from the AMA for his work on the CPT and received the Exemplary Service Award from the American Society of Hematology. Dr. Silver received the Laureate Award from the Michigan Chapter of the American College of Physicians in 2014 and in 2017 received the Albert Nelson Marquis Lifetime Achievement Award.

Dr. Silver serves on the editorial board of several scientific journals. He is a Master of the American College of Physicians and a Fellow of both the American Heart Association and the American Society of Clinical Oncology. He is a member of the American Society for Blood and Marrow Transplantation and the American Society of Hematology, and served on the Boards of the latter two organizations and is currently Chair of the ASH Nominations Committee. He serves on the Scientific Board of Advisors of the American Porphyria Foundation. He is Past-President of the Michigan Society of Hematology and Oncology and remains on its Board of Directors and serves on the Michigan ACP Governor's Council.

Financial Implications of CAR-T Cell Therapies

ASH/ASCO CAC Meeting
July 27, 2018

Samuel M Silver, MD, PhD, MACP, FASCO
Chair, Subcommittee on Reimbursement
American Society of Hematology
Professor of Internal Medicine and Assistant Dean for Research
University of Michigan Medical School



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 - Suzanne M. Leous, MPA
Chief Policy Officer
 - Leslie Brady
Policy & Practice Manager
- Michigan Medicine Contracting Office
 - Thomas Daly
Director of Managed Care, Michigan
Medicine
- Memorial Sloan Kettering Cancer Center
 - Leonard Saltz, MD

Nivolumab + Ipilimumab in Metastatic Melanoma

(Wolchok et al: Proc ASCO 2015)

	NIVO	NIVO + IPI	IPI
Total Population			
Median PFS, months (95% CI)	6.9 (4.3-9.9)	11.5 (8.8-16.7)	2.9 (2.5-3.4)

From Leonard Saltz, ASCO 2015

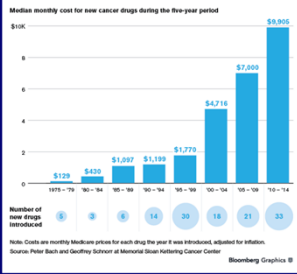
Regimen Cost (80 kg patient)

Regimen	Cost of Nivolumab	Cost of Ipilimumab	Cost of Regimen
Nivo+ Ipi for 11.5 m	\$144,408	\$151,158	\$295,566
Nivo for 6.9 m	\$103,220	\$0	\$103,220
Ipilimumab for 2.9 m	\$0	\$158,252	\$158,252

From Leonard Saltz, ASCO 2015

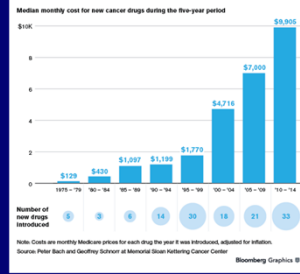
Cancer Drugs Hit Market at Ever-Higher Prices

U.S. prices for new cancer drugs have soared since the 1970s despite an increasing number of available brands.



Cancer Drugs Hit Market at Ever-Higher Prices

U.S. prices for new cancer drugs have soared since the 1970s despite an increasing number of available brands.



Pembrolizumab
2 mg/kg

← \$14,500

Pembrolizumab AWP
(Redbook online): \$51,792 / mg

$$\$51,792 \times 10 \text{ mg/kg} \times 75 \text{ kg} \times 26 \text{ doses/year} =$$

\$1,009,944 per patient / per year

Selection of 2015 ASCO abstracts using
Pem 10 mg/kg q 2 wks:

- abstract # 4010 (esophageal ca)
- abstract # 5510 (ovarian ca)
- abstract # 7502 (small cell lung ca)
- abstract # 8035 (non-small cell lung ca)
- abstract # 9040 (melanoma)

Pembrolizumab 10 mg/kg
q 2 weeks
\$83,500/month

From Leonard Saltz, ASCO 2015

Unsustainable

From Leonard Saltz, ASCO 2015

THE WORLD'S MOST EXPENSIVE CARS

\$8 million — Mercedes-Benz Maybach Exelero

\$4.8 million — Koenigsegg CCXR Trevita



This is what \$740,000 looks like. Each shipper contains one Yescarta product.



JAMA November 21, 2017 Volume 318, Number 19, 1861



VIEWPOINT

FDA Approval of Tisagenlecleucel
Promise and Complexities of a \$475 000 Cancer Drug

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Related articles at
jamaoncology.com,
jamaonlinetextbooks.com

Approval of the drug tisagenlecleucel (Ymtrah; Novartis) by the US Food and Drug Administration (FDA) for the treatment of pediatric and young adult acute lymphoblastic leukemia (ALL) in August 2017 was a landmark in oncology. The science underlying chimeric antigen receptor T cells (CAR-T) heralds a new era of treatment, and the list price of \$475 000 for the new drug (delivered as a one-time infusion) definitively shattered oncology drug pricing norms.¹

Unlike most cancer therapies that are identical from patient to patient, CAR-T therapies are made by removing the T cells of a patient, genetically modifying them to respond to certain targets expressed on the patient's cancer cells, and then reinfusing the cells. When the T cells come into contact with the relevant target (for instance, CD19 in the case of ALL), they proliferate while secreting a number of programmed substances including inflammatory cytokines that destroy the cancerous cells. Targeted killing of tumor cells by lymphocytes was first suggested by the graft vs leukemia effect in bone marrow transplantation.² The discovery and the

the patient is technically challenging. Accordingly, for the foreseeable future this new type of treatment will (and should) only be available at institutions that have broad clinical capabilities and experience in hematopoietic cell transplantation.

The price of this therapy should serve as a reminder that future revenue outlooks for a pharmaceutical company are in part related to the ability to generate many millions in revenue even when few patients benefit from the new therapies. Novartis reports that around 600 patients will be eligible each year for tisagenlecleucel (for its just-approved indication).³ Gilead's \$12 billion offer to purchase Kite Pharma, a company focused on developing CAR-T therapies, reflects the expectation that these treatments will generate large returns even when given to few patients.

The Institute for Clinical and Economic Review (ICER) is planning to review CAR-T cost effectiveness in early 2018, which will provide an estimate of the appropriateness of the price of this therapy relative to clinical benefits. The ICER review is not an independent

CAR-T Product Overview



- **Kymriah™ (Novartis) Tisagenlecleucel**
- Relapsing/relapsed or refractory P-ALL (up to age 25)
 - Price=\$475,000
- Adult patients with r/r large B-cell lymphoma after two or more lines of systemic therapy including diffuse large B-cell lymphoma (DLBCL), high grade B-cell lymphoma and DLBCL arising from follicular lymphoma
 - Price=\$373,000
 - ~50% Medicare
- 53 Centers, 52 currently certified
- FACT accreditation required
- **Bb2121 (Celgene/bluebird)**
 - FDA breakthrough-therapy designation, 11/2017
 - R/R Myeloma
- **Yescarta™ (Kite/Gilead) Axicabtagene ciloleucel**
- Adult r/r large B-cell lymphoma subtypes
 - Price=\$373,000
 - ~50% Medicare
- 61 centers, 61 certified
- FACT accreditation required
- **Numerous other trials happening:**
 - Different disease targets
 - Different constructs
 - Allogeneic: specific and universal
 - "Bedside" capabilities
 - Dozens of companies and academic groups involved

Kymriah Certified Treatment Sites (Accessed 15 July 2018)



Physician and Facility Reimbursement

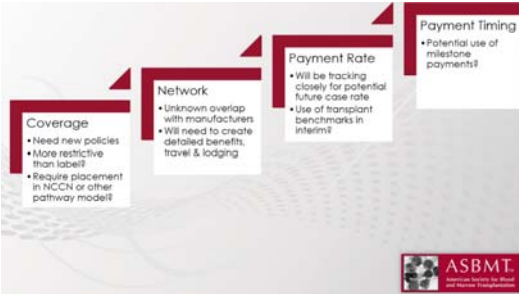


- Why should providers and facilities take the time to code this work effort?
 - Appropriate reimbursement for both providers and facilities
 - Accurate charge capture to CMS and private carriers using uniform coding systems so that new DRG codes and appropriate RVUs are assigned to new CPT codes
 - With relatively small number of procedures and variance on how these are coded, risk of inaccurate cost assignment from payers

The following Category III codes were accepted at the May 2018 CPT Editorial Panel meeting for the 2019 CPT production cycle. However, due to the Category III code early release policy, these codes are effective on January 1, 2019, following the six-month implementation period which begins July 1, 2018.

Code	Long Code Descriptor	Published to AMA Website	Effective Date	Publication
► Cellular and Gene Therapy ◀				
The guidelines for Cellular and Gene Therapy are pending further Panel review. Please check back for an update on or around July 27, 2018.				
•0537T	Chimeric antigen receptor T-cell (CAR-T) therapy; harvesting of blood-derived T lymphocytes for development of genetically modified autologous CAR-T cells, per day	July 1, 2018	January 1, 2019	CPT® 2019
•0538T	preparation of blood-derived T lymphocytes for transportation (eg, cryopreservation, storage)	July 1, 2018	January 1, 2019	CPT® 2019
•0539T	receipt and preparation of CAR-T cells for administration	July 1, 2018	January 1, 2019	CPT® 2019
•0540T	CAR-T cell administration, autologous	July 1, 2018	January 1, 2019	CPT® 2019

Private Payer Access Issues



Medicaid Access Issues



Current Medicare Inpatient Reimbursement Insufficient



- 8-Cell Lymphoma age group will mean ~50% Medicare Beneficiaries
- Expectation of 75%+ inpatient for first 1-3 years
 - At some centers, 100% inpatient
 - Drug costs would be included in MS-DRGs
 - No operating room procedure to increase severity weight
- Lymphoma MS-DRGs (840-842) pay base rates of \$4-\$14k
 - Very high acquisition costs
 - New Technology Add-on Payment (NTAP) not available in FY2018 due to timing of FDA approvals and CMS's decision cycle, and is not available to all providers
 - Outlier payment not likely to mitigate losses, and is not available to all providers
- Limited facilities able to provide this care = concentration of payer issues
- Significant underpayment problem for both PFS and PFS-exempt hospitals
- Medicare Advantage/Supplement Payments are unclear; payers are unsure about what benchmarks they should use for assigning payment rates



Current IPPS Medicare Reimbursement



- Inpatient cases group to a MS-DRG based on the diagnoses and procedures on the claim.
- In addition to the MS-DRG payment, total charges are evaluated on each IPPS case for possible additional outlier payment.

MS-DRG	MDC	Type	Title	Weights	Approximate Base Reimbursement	Geo Mech LOS
840	17	MED	LYMPHOMA & NON-ACUTE LEUKEMIA W MCC	3.0764	\$14,734	7
841	17	MED	LYMPHOMA & NON-ACUTE LEUKEMIA W CC	1.6201	\$8,807	4.3
842	17	MED	LYMPHOMA & NON-ACUTE LEUKEMIA W/O CC/MCC	1.1241	\$4,110	2.9

Using Outlier Medicare IPPS Calculations for CAR-T Claims



- The only payment augmentation option for this fiscal year is the outlier calculation, which relies on a calculation that assumes mark-up. In order to recover even close to the invoice cost for the product (**not accounting for the cost of the inpatient stay itself**), hospitals would need to mark-up the product by 400%, due to the way CMS processes charges on a claim
- NTAP (New Technology Add-On Payment) goes into effect October 1, with the new Fiscal Year. CMS will tip their hat in terms of whether they seem to think the technologies that applied for NTAP will meet qualifications in the proposed rule in April, but it won't be final until August with the final rule and doesn't go into effect until 10/1/2018. (This was further delayed with the recent Proposed Rule). **And it's not pass-through - it covers the lesser of 50% of the product cost OR a calculated amount spent by the facility on the treatment episode.** CMS has been denying the bulk of NTAP applications, so it will be interesting to see how they treat the CAR-T applications given all the conversations about this therapy.

IPPS Hospital Outlier Formula



- The Medicare Administrative Contractor (MAC) takes the hospital's **total inpatient covered charges** billed on the claim and multiplies these by the hospital's operating cost-to-charge ratio (CCR) from their most recently filed cost report to generate "cost"
- The calculated cost is compared to the sum of the MS-DRG payment for the case and the outlier threshold
 - For FY2018, the IPPS fixed dollar outlier threshold is \$26,713
 - IPPS MS-DRG base payment for MS-DRG 840 is \$16,736
- If there is "excess cost" CMS will make an outlier payment
 - Recap:** (Total charges billed on claim) * (hospital's CCR) = X
 - If X > (MS-DRG payment + fixed outlier threshold), outlier payment is warranted
 - Outlier payment = 80% * (X - (DRG + IME + DSH + threshold))

Note: Outlier payments not available to IPPS-exempt hospitals



Examples of IPPS Outlier Calculation for CAR-T Claims



Example 1 - 110% Mark-up & Assumes CCR of 0.25

Hospital A Example CAR-T Inpatient Operating Outlier Calculation			
Example MS-DRG Base Payment	\$	16,736.00	
IPPS Outlier Threshold	\$	26,713.00	
Total Charges from Inpatient Claim	\$	524,800.00	
Calculated Hospital Cost (Charges * CCR)	\$	131,200.00	
Outlier Threshold (MS-DRG Base + Threshold)	\$	43,449.00	
Outlier Payment (Cost minus threshold * 80%)	\$	30,100.80	
Total Case Payment (MS-DRG Payment Plus Outlier)	\$	86,836.80	

\$56,836.80 Medicare payment
 \$373,000.00 invoice cost
 \$286,163.20 Hospital's loss before case costs factored in

Hospital's loss before case costs factored in

Example 2 - 400% Mark-up & Assumes CCR of 0.25

Hospital A Example CAR-T Inpatient Operating Outlier Calculation			
Example MS-DRG Base Payment	\$	16,736.00	
IPPS Outlier Threshold	\$	26,713.00	
Total Charges from Inpatient Claim	\$	1,408,000.00	
Calculated Hospital Cost (Charges * CCR)	\$	352,000.00	
Outlier Threshold (MS-DRG Base + Threshold)	\$	43,449.00	
Outlier Payment (Cost minus threshold * 80%)	\$	268,480.80	
Total Case Payment (MS-DRG Payment Plus Outlier)	\$	305,176.80	

\$305,176.80 Medicare payment
 \$373,000.00 invoice cost
 \$67,823.20 Hospital's loss before case costs factored in

Hospital's loss before case costs factored in



Cost of Full Care Episode Unknown



Base inpatient stay - 10-14 days, without complications

CRS and Neurotoxicity - add additional days, ICU costs

Tocilizumab now approved for CRS - price increase?

What proportion of CAR-T cases will need later AlloHCT?

On-going immune system support - need for long-term IVIG?



The “Novartis Promise”



Alex Lash
August 31st, 2017

@alexlash
@xconomy

Xconomy National –
Novartis said Wednesday that it would not charge for its newly approved cellular immunotherapy, tisagenlecleucel (Kymriah)—the first so-called CAR-T product to ever come to market—if it fails to help patients within a month.

Mailankody and Bach, Ann Intern Med 2018;168:888-9



EDITORIAL

Annals of Internal Medicine

Money-Back Guarantees for Expensive Drugs: Wolf's Clothing but a Sheep Underneath

Prices of branded specialty drugs are often far higher than they would be if they were based on their benefits. The pharmaceutical industry thus has a plan called outcomes-based contracting that involves refunds when a patient does not experience the intended therapeutic benefit.

Emphasizing the refund—the product being free if you do not like it—works for late-night salespersons because it provides false comfort to the buyer. It distracts from the more essential question of how much the product is worth when it does work.

CMS quit test of pricey cancer treatment amid concerns over industry role, from Politico Pro



- Medicare and Medicaid administrators earlier this year quietly killed a plan to pay for a breakthrough, half-million-dollar cancer treatment based on how well it worked, scuttling one of the Trump's administration's first and most highly touted attempts to lower the cost of drugs.
- The Centers for Medicare and Medicaid Services touted how the "pay-for-performance" arrangement would save lives and cut Medicare and Medicaid spending right after the FDA approved the company's \$475,000 gene therapy to treat kids and young adults with leukemia.
- The demise of the deal, first disclosed in response to questions from congressional Democrats about Novartis' payments to Cohen, illustrates how difficult it is to figure out how much government health programs should pay for expensive treatments whose long-term benefits are still unclear.
- "Coming from an administration which has a stated goal of trying to reduce drug pricing, trying to reduce overall drug spending and health care spending ... at every turn this administration has taken steps in the opposite direction and this is one," said Rachel Sachs, a professor who focuses on health law at Washington University in St. Louis.
- Sachs said pay-for-performance deals can give drugmakers political cover to charge whatever they want if the companies can influence performance targets – in this case, with that short one-month timeline.

Joint Societies' Objectives on CAR-T Payment

Goal: Structure that allows physicians to utilize what they feel is the best product for each patient, in the most appropriate care setting.

Therefore, seeking solutions that:

- Create a site-neutral, product-agnostic payment structure
- Remove provider responsibility for 'managing' product costs
- Minimize/remove financial losses for providing CAR-T
- Create flexibility for future products and combination therapies
- Minimally disrupt reimbursement for other cellular therapies/HCT



CMS IPPS Proposed Rule



- In the Proposed Rule, CMS outlined several alternatives to address CAR-T reimbursement in FY2019:
 - a) Assignment of an NTAP to CAR-T products;
 - b) Assignment of CAR-T claims to MS-DRG 016;
 - c) Implementation of a cost-to-charge ratio (CCR) of 1.0 for CAR-T products;
 - d) Creation of a new MS-DRG that incorporates a portion of the product cost; and
 - e) "Alternative approaches and authorities to encourage value-based care and lower drug prices."

IPPS: CAR-T Proposals

Assignment of CAR-T cases to MS-DRG 016 (Auto-BMT)

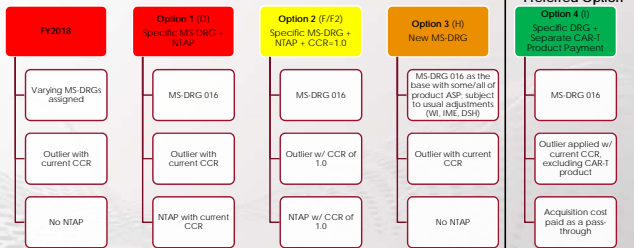
Use of a cost-to-charge ratio (CCR) of 1.0 ★★ ★

Potential for a new MS-DRG with "some portion of the ASP"

"Other alternative payment mechanisms"



Payment Options/Combinations



Payment Options/ Combinations

Option Description ¹	CMS ² Usual Rate-Setting Processes		Brand New MS-DRG ³	Options for Operationalizing a Cost-to-Charge Ratio of 1.0 ⁴		
	A	B	H ⁵	F ⁶	and	F2
	FY 2018 Status Quo	Auto MS-DRG (or equivalent) and NTAP Approved	Brand New MS-DRG with 100% of CAR-T ASP Built In (Current CCR)	Auto MS-DRG, CCR of 1.0 and NTAP	and	Auto MS-DRG, CCR of 1.0 and NTAP
MS-DRG ⁷	B40 or other	016	New	016	and	016
Outlier	Current methodology	Current methodology	Current methodology	Product acquisition cost used to implement a CCR of 1.0 (reported by providers on the claim with a new value code)	ASP substituted for acquisition cost to implement a CCR of 1.0 (reported by manufacturers)	Outlier applied with the current CCR excluding the CAR-T product cost
NTAP	Not available	Approved	No NTAP since base includes 100% of product cost	Approved (product acquisition cost used to implement a CCR of 1.0 as reported by providers on the claim with a new value code)	Approved (ASP used to implement a CCR of 1.0 as reported by manufacturers to CMS)	No NTAP per se since the CAR-T acquisition cost paid as a pass-through
Financial Impact Based on Hospital A w/ 10% Mark up	(\$135,999)	(\$304,425)	(\$17,069)	(\$42,750)	and	(\$17,069)
Financial Impact Based on Hospital B w/ 400% Mark up	(\$103,691)	(\$42,750)	(\$17,069)	(\$42,750)	and	(\$17,069)

Options 1 and 2: NTAP and Outlier

NTAP and outlier combination is insufficient

- Calculation designed to recognize marginal difference in average cost of cases using new technologies and/or with extremely high total costs
- Will not pay appropriately for new cases driven by single high cost product

Addressing charge compression

- High cost drugs known to face charge compression; most facilities reluctant to mark-up CAR-T products (transparency initiatives)
- CMS may be able to ameliorate the impact of charge compression depending on how it implements a CCR of 1.0 but it may be complicated to implement in the short term
- Applying a CCR of 1.0 to the outlier and NTAP calculations (Option 2 - F/F2), still results in roughly a \$60,000 expected loss for hospitals per case



Option 3: New CAR-T MS-DRG

Standard IPPS adjustments creates winners and losers

- Labor cost (Wage index (WI))
- Teaching hospital expenses (indirect medical education (IME), and
- Cost of caring for low income individuals (disproportionate share hospital (DSH))

CMS would lose a transparency opportunity

- Chance to implement line of sight into the product and care costs
- New CAR-T MS-DRG likely needed once IPPS claims become available
- CMS needs better, more granular data to set appropriate payment policy for CAR-T cases going forward

Not site neutral - produces very different CAR-T payments for cases treated in the inpatient vs. outpatient setting

Challenging to make appropriate budget neutrality adjustment (e.g., assumptions regarding number of claims and where services will be performed)



Option 4: Separate Product Payment - Pays Most Appropriately in FY19; Best for Future Rate-setting

CMS could pay separately for the CAR-T product

- Costs of care would be paid under MS-DRG 016 with current outlier policy
- CAR-T product costs paid as pass-through at actual acquisition or invoice cost
- Would rely on CMS' broad adjustment authority¹
- Similar payment methodology to that used for hemophilia blood clotting factors

Separate payment has numerous benefits:

- Addresses charge compression; implementing the proposal of using a CCR of 1.0
- Logical outgrowth of proposed rule
- Easily verifiable, provides consistent payment across CAR-T centers, and is site neutral
- Avoids creating winners and losers from application of IPPS adjustments (WI, IME, DSH) to CAR-T portion of payment
- Can facilitate data collection on the true cost of patient care services (separate from CAR-T product itself) to use in future rate-setting when claims are available

¹ 1886(d)(5)(i)(i) - "The Secretary shall provide by regulation for such other exceptions and adjustments to such payment amounts under this subsection as the Secretary deems appropriate."



Payment Options/ Combinations

Option Description ¹	CMS ¹ Usual Rate-Setting Processes		Brand New MS-DRG ²	Options for Operationalizing a Cost-to-Charge Ratio of 1.0 ³		
	A	B	H ⁴	F ⁵	F2	I
	FY 2018 Status Quo	Auto MS-DRG (or equivalent) and NTAP Approved	Brand New MS-DRG with 100% of CAR-T ASP Built In (Current CCR)	Auto MS-DRG, CCR of 1.0 and NTAP	Auto MS-DRG, CCR of 1.0 and NTAP	Auto MS-DRG and a Separate CAR-T Product Payment Based on ASP or some equivalent (e.g., actual acquisition cost reported on claim)
MS-DRG ²	B40 or other	016	New	016	016	016
Outlier	Current methodology	Current methodology	Current methodology	Product acquisition cost used to implement a CCR of 1.0 (reported by providers on the claim with a new value code)	ASP substituted for acquisition cost to implement a CCR of 1.0 (reported by manufacturers)	Outlier applied with the current CCR excluding the CAR-T product cost
NTAP	Not available	Approved	No NTAP since base includes 100% of product cost	Approved (product acquisition cost used to implement a CCR of 1.0 as reported by providers on the claim with a new value code)	Approved (ASP used to implement a CCR of 1.0 as reported by manufacturers to CMS)	No NTAP per se since the CAR-T acquisition cost paid as a pass-through
Financial Impact Based on Hospital A w/ 10% Mark up	(\$135,999)	(\$304,425)	(\$17,069)	(\$42,750)	(\$62,750)	(\$17,069)
Financial Impact Based on Hospital B w/ 400% Mark up	(\$103,691)	(\$42,750)	(\$17,069)	(\$42,750)	(\$62,750)	(\$17,069)

PPS-Exempt Hospitals



- For PPS-Exempt hospitals CMS can implement a CCR of 1.0 using specific cost-reporting processes outlined by the Alliance of Dedicated Cancer (ADCC) in its comment letter. This will ensure that the agency can clearly identify the hospital's cost of acquiring the therapy and reimburse for it accordingly.

Bottom Line: Providers and Hospitals Need Relief and Change

Personalized products with little/no opportunity for discounts, bulk purchase, or sole sourcing

Little interchangeability of products based on disease/condition (MM, DLBCL, etc)

Centers providing one of these therapies likely providing several others – the averaging system does not work for this concentration of losses

Providers cannot create the desired 'efficiencies' within IPPS at the current prices

- the 'margin' on an admission without CRS does not make up for product losses

Providers are choosing to do the right thing for patients now, despite pressure to do otherwise – have taken substantial losses during the past year in the inpatient setting



Formal Request for National Coverage Determination for Chimeric Antigen Receptor T-Cell Therapies



- Given the complexity of the therapy, treating patients with acute life-threatening disease requiring the manufacture of an individualized product, the potential for severe and also life-threatening side-effects necessitating specialized expertise to manage, and the high cost of the products and associated care required, a National Coverage Determination is essential to ensure that coverage is available to the Medicare population and that the criteria used to determine eligibility for coverage are evidence-based and are consistent regardless of the state of residence of the beneficiary. UHC proposes that coverage for CAR-T cell therapy be based upon the indications specified in the FDA labels. However, given that CAR-T cell therapy is an innovative therapy, and ongoing clinical trials are likely to identify new patient populations who may benefit, which may not all be reviewed by the FDA, we urge CMS to develop a process to up-date the NCD as new evidence emerges.

ASH Rationale and Reply to NCD Request



- **National CAR-T Cell Therapy Coverage Determination is Premature**
- CAR-T Cell Therapy is an Evolving Area of Medicine
 - With over 400 clinical trials in process, it is impossible to know what the ultimate applications of the therapy will be.
 - The science may change as well. Currently, CAR-T cell therapy is an incredibly personalized process, requiring products to be individually created for each patient. However, clinical trials are underway to develop allogeneic universal or 'off-the-shelf' CAR-T cells.
- Concerns Related to Patient Access to Care
 - An NCD that restricts coverage for certain conditions has the potential to limit a life-saving therapy for patients. It is nearly impossible to get an accurate assessment of the applicability of this therapy given the rapidly evolving science and the hundreds of open clinical trials. It is standard practice for CMS to issue NCDs for well-established treatments, rather than a therapy that is still new and evolving, such as CAR-T cell therapy.
- Complex Nature of the National Coverage Process
 - The complex nature of the national coverage process, including the process of revising already existing NCDs, heightens about stifling innovation and limiting patient access. The science and practice of CAR-T cell therapy are immature at this point, and whatever coverage policy CMS finalizes may require frequent revisions to keep up with the science and its clinical translations.

What Does This All Mean?



- This is not our “typical” therapy from a cost structure, even compared to leukemia induction or alloBMT.
- The expense of cell processing makes our institutions financially more vulnerable
 - We haven’t even costed out inadequate payment for CRS treatment/ICU expenses/IV IgG, etc.
- How are we going to do this?
 - The excitement at ASH is palpable, but...How will the financial realities effect the future of promising translational scientific breakthroughs?
- I said that I was not going to talk about policy, but is this *sustainable*?

CMS Resources

- [Medicare's Program Integrity Manual, Chapter 13](#) (*outlines the local coverage determinations the Carrier Advisory Committee (CAC) and contractor responsibilities surrounding CACs*)
- [General Information on CMS' Contracting Reform](#)
- [Medicare Administrative Contractors \(MAC\) Regions and Updates](#)
- [Map of Current Jurisdictions](#)
- [Map of Consolidated Regions](#) (*what CMS is moving toward*)
- [Durable Medical Equipment MACs](#)
- [Medicare Coverage](#)
- [Medicare Coverage Centers](#)
- [Merit-based Incentive Payment System and Quality Payment Program](#).
- [CMS Biosimilars](#)
- [Proposed Decision Memo for Next Generation Sequencing for Medicare Beneficiaries with Advanced Cancer](#)
- [CMS Finalizes Coverage of Next Generation Sequencing Tests, Ensuring Enhanced Access to Cancer Patients](#)



Ten Things Physicians and Patients Should Question

1

Don't transfuse more than the minimum number of red blood cell (RBC) units necessary to relieve symptoms of anemia or to return a patient to a safe hemoglobin range (7 to 8 g/dL in stable, non-cardiac in-patients).

Transfusion of the smallest effective dose of RBCs is recommended because liberal transfusion strategies do not improve outcomes when compared to restrictive strategies. Unnecessary transfusion generates costs and exposes patients to potential adverse effects without any likelihood of benefit. Clinicians are urged to avoid the routine administration of 2 units of RBCs if 1 unit is sufficient and to use appropriate weight-based dosing of RBCs in children.

2

Don't test for thrombophilia in adult patients with venous thromboembolism (VTE) occurring in the setting of major transient risk factors (surgery, trauma or prolonged immobility).

Thrombophilia testing is costly and can result in harm to patients if the duration of anticoagulation is inappropriately prolonged or if patients are incorrectly labeled as thrombophilic. Thrombophilia testing does not change the management of VTEs occurring in the setting of major transient VTE risk factors. When VTE occurs in the setting of pregnancy or hormonal therapy, or when there is a strong family history plus a major transient risk factor, the role of thrombophilia testing is complex and patients and clinicians are advised to seek guidance from an expert in VTE.

3

Don't use inferior vena cava (IVC) filters routinely in patients with acute VTE.

IVC filters are costly, can cause harm and do not have a strong evidentiary basis. The main indication for IVC filters is patients with acute VTE and a contraindication to anticoagulation such as active bleeding or a high risk of anticoagulant-associated bleeding. Lesser indications that may be reasonable in some cases include patients experiencing pulmonary embolism (PE) despite appropriate, therapeutic anticoagulation, or patients with massive PE and poor cardiopulmonary reserve. Retrievable filters are recommended over permanent filters with removal of the filter when the risk for PE has resolved and/or when anticoagulation can be safely resumed.

4

Don't administer plasma or prothrombin complex concentrates for non-emergent reversal of vitamin K antagonists (i.e. outside of the setting of major bleeding, intracranial hemorrhage or anticipated emergent surgery).

Blood products can cause serious harm to patients, are costly and are rarely indicated in the reversal of vitamin K antagonists. In non-emergent situations, elevations in the international normalized ratio are best addressed by holding the vitamin K antagonist and/or by administering vitamin K.

5

Limit surveillance computed tomography (CT) scans in asymptomatic patients following curative-intent treatment for aggressive lymphoma.

CT surveillance in asymptomatic patients in remission from aggressive non-Hodgkin lymphoma may be harmful through a small but cumulative risk of radiation-induced malignancy. It is also costly and has not been demonstrated to improve survival. Physicians are encouraged to carefully weigh the anticipated benefits of post-treatment CT scans against the potential harm of radiation exposure. Due to a decreasing probability of relapse with the passage of time and a lack of proven benefit, CT scans in asymptomatic patients more than 2 years beyond the completion of treatment are rarely advisable.



Ten Things Physicians and Patients Should Question

6

Don't treat with an anticoagulant for more than three months in a patient with a first venous thromboembolism (VTE) occurring in the setting of a major transient risk factor.

Anticoagulation is potentially harmful and costly. Patients with a first VTE triggered by a major, transient risk factor such as surgery, trauma or an intravascular catheter are at low risk for recurrence once the risk factor has resolved and an adequate treatment regimen with anticoagulation has been completed. Evidence-based and consensus guidelines recommend three months of anticoagulation over shorter or longer periods of anticoagulation in patients with VTE in the setting of a reversible provoking factor. By ensuring a patient receives an appropriate regimen of anticoagulation, clinicians may avoid unnecessary harm, reduce health care expenses and improve quality of life. This *Choosing Wisely*® recommendation is not intended to apply to VTE associated with non-major risk factors (e.g., hormonal therapy, pregnancy, travel-associated immobility, etc.), as the risk of recurrent VTE in these groups is either intermediate or poorly defined.

7

Don't routinely transfuse patients with sickle cell disease (SCD) for chronic anemia or uncomplicated pain crisis without an appropriate clinical indication.

Patients with SCD are especially vulnerable to potential harms from unnecessary red blood cell transfusion. In particular, they experience an increased risk of alloimmunization to minor blood group antigens and a high risk of iron overload from repeated transfusions. Patients with the most severe genotypes of SCD with baseline hemoglobin (Hb) values in the 7-10 g/dl range can usually tolerate further temporary reductions in Hb without developing symptoms of anemia. Many patients with SCD receive intravenous fluids to improve hydration when hospitalized for management of pain crisis, which may contribute to a decrease in Hb by 1-2 g/dL. Routine administration of red cells in this setting should be avoided. Moreover, there is no evidence that transfusion reduces pain due to vaso-occlusive crises. For a discussion of when transfusion is indicated in SCD, readers are referred to recent evidence-based guidelines from the National Heart, Lung, and Blood Institute (NHLBI) (see reference below).

8

Don't perform baseline or routine surveillance computed tomography (CT) scans in patients with asymptomatic, early-stage chronic lymphocytic leukemia (CLL).

In patients with asymptomatic, early-stage CLL, baseline and routine surveillance CT scans do not improve survival and are not necessary to stage or prognosticate patients. CT scans expose patients to small doses of radiation, can detect incidental findings that are not clinically relevant but lead to further investigations and are costly. For asymptomatic patients with early-stage CLL, clinical staging and blood monitoring is recommended over CT scans.

9

Don't test or treat for suspected heparin-induced thrombocytopenia (HIT) in patients with a low pre-test probability of HIT.

In patients with suspected HIT, use the "4T's" score to calculate the pre-test probability of HIT. This scoring system uses the timing and degree of thrombocytopenia, the presence or absence of thrombosis, and the existence of other causes of thrombocytopenia to assess the pre-test probability of HIT. HIT can be excluded by a low pre-test probability score (4T's score of 0-3) without the need for laboratory investigation. Do not discontinue heparin or start a non-heparin anticoagulant in these low-risk patients because presumptive treatment often involves an increased risk of bleeding, and because alternative anticoagulants are costly.

10

Don't treat patients with immune thrombocytopenic purpura (ITP) in the absence of bleeding or a very low platelet count.

Treatment for ITP should be aimed at treating and preventing bleeding episodes and improving quality of life. Unnecessary treatment exposes patients to potentially serious treatment side effects and can be costly, with little expectation of clinical benefit. The decision to treat ITP should be based on an individual patient's symptoms, bleeding risk (as determined by prior bleeding episodes and risk factors for bleeding such as use of anticoagulants, advanced age, high-risk activities, etc.), social factors (distance from the hospital/travel concerns), side effects of possible treatments, upcoming procedures, and patient preferences. In the pediatric setting, treatment is usually not indicated in the absence of mucosal bleeding regardless of platelet count. In the adult setting, treatment may be indicated in the absence of bleeding if the platelet count is very low. However, ITP treatment is rarely indicated in adult patients with platelet counts greater than 30,000/microL unless they are preparing for surgery or an invasive procedure, or have a significant additional risk factor for bleeding. In patients preparing for surgery or other invasive procedures, short-term treatment may be indicated to increase the platelet count prior to the planned intervention and during the immediate post-operative period.

How This List Was Created (1–5)

The American Society of Hematology (ASH) *Choosing Wisely*® Task Force utilized a modified Delphi technique to collect suggestions from committee members and recipients of its clinically focused newsletter, the *ASH Practice Update*. Respondents were asked to consider the core values of harm, cost, strength of evidence, frequency and control. Fifty-nine of 167 ASH committee members (35%) and 2 recipients of the *ASH Practice Update* submitted 81 unique suggestions. The Task Force used a nominal group technique (NGT) to identify the top 20 items, which were scored by ASH committee and practice community members, with a 46 percent participation rate. ASH's Task Force reviewed all scores to develop a 10-item list. A professional methodologist conducted a systematic literature review on each of the 10 items; the Task Force chair served as the second reviewer. Evidence reviews and source material for the 10 items were shared with ASH's Task Force, which ranked the items according to the core values. The Task Force then identified the top 5 items plus 1 alternate. ASH member content experts provided external validation for the veracity and clarity of the items.

How this List was Created (6–10)

Suggestions for the second ASH *Choosing Wisely* list were solicited from members of the ASH Committee on Practice, the ASH Committee on Quality, the ASH *Choosing Wisely* Task Force, ASH Consult-a-Colleague volunteers and members of the ASH Practice Partnership. Six principles were used to prioritize items: avoiding harm to patients, producing evidence-based recommendations, considering both the cost and frequency of tests and treatments, making recommendations in the clinical purview of the hematologist, and considering the potential impact of recommendations. Harm avoidance was established as the campaign's preeminent guiding principle. Guided by the 6 principles, the ASH *Choosing Wisely* Task Force scored all suggestions. Modified group technique was used to select 10 semi-finalist items. Systematic reviews of the literature were then completed for each of the 10 semi-finalist items. Guided by the 6 core principles outlined above, and by the systematic reviews of the evidence, the ASH *Choosing Wisely* Task Force selected 5 recommendations for inclusion in ASH's second *Choosing Wisely* Campaign.

ASH's disclosure and conflict of interest policy can be found at www.hematology.org.

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About the ABIM Foundation

The mission of the ABIM Foundation is to advance medical professionalism to improve the health care system. We achieve this by collaborating with physicians and physician leaders, medical trainees, health care delivery systems, payers, policymakers, consumer organizations and patients to foster a shared understanding of professionalism and how they can adopt the tenets of professionalism in practice.

To learn more about the ABIM Foundation, visit www.abimfoundation.org.



About the American Society of Hematology

The American Society of Hematology (ASH) is the world's largest professional society of hematologists, serving more than 14,000 clinicians and scientists from around the world who are dedicated to furthering the understanding, diagnosis, treatment and prevention of disorders affecting the blood.

For more than 50 years, the Society has led the development of hematology as a discipline by promoting research, patient care, education, training and advocacy in hematology. By providing a forum for clinicians and scientists to share the latest discoveries in the field, ASH is helping to improve care and possibly lead to cures for diseases that affect millions of people, including leukemia, lymphoma, myeloma, anemias and various bleeding and clotting disorders.

For more information, visit www.hematology.org.



Non-ASH Choosing Wisely® Recommendations of Relevance to Hematology



An initiative of the ABIM Foundation



American
Society of
Hematology

ACR

Don't image for suspected PE without moderate or high pre-test probability of PE.

While deep vein thrombosis (DVT) and PE are relatively common clinically, they are rare in the absence of elevated blood D-Dimer levels and certain specific risk factors. Imaging, particularly computed tomography (CT) pulmonary angiography, is a rapid, accurate, and widely available test, but has limited value in patients who are very unlikely, based on serum and clinical criteria, to have significant value. Imaging is helpful to confirm or exclude PE only for such patients, not for patients with low pre-test probability of PE. *Source: American College of Radiology (ACR). Wording reflects that of the Radiology recommendation, other societies have similar recommendations, some explicitly recommended D-Dimer testing prior to imaging.*

ASRM

Don't routinely order thrombophilia testing on patients undergoing a routine infertility evaluation.

There is no indication to order these tests, and there is no benefit to be derived in obtaining them in someone that does not have any history of bleeding or abnormal clotting and in the absence of any family history. This testing is not a part of the infertility workup. Furthermore, the testing is costly, and there are risks associated with the proposed treatments, which would also not be indicated in this routine population. *Source: American Society for Reproductive Medicine (ASRM).*

SHM

Don't perform repetitive CBC and chemistry testing in the face of clinical and lab stability.

Hospitalized patients frequently have considerable volumes of blood drawn (phlebotomy) for diagnostic testing during short periods of time. Phlebotomy is highly associated with changes in hemoglobin and hematocrit levels for patients and can contribute to anemia. This anemia, in turn, may have significant consequences, especially for patients with cardiorespiratory diseases. Additionally, reducing the frequency of daily unnecessary phlebotomy can result in significant cost savings for hospitals. *Source: Society for Hospital Medicine – Adult Hospital Medicine (SHM). Wording reflects that of the Adult Hospital Medicine recommendation; other societies have similar recommendations.*

AABB

Don't transfuse red blood cells for iron deficiency without hemodynamic instability.

Blood transfusion has become a routine medical response despite cheaper and safer alternatives in some settings. Pre-operative patients with iron deficiency and patients with chronic iron deficiency without hemodynamic instability (even with low hemoglobin levels) should be given oral and/or intravenous iron. *Source: American Association of Blood Banks (AABB).*

ASCO

Avoid using positron emission tomography (PET) or PET-CT scanning as part of routine follow-up care to monitor for a cancer recurrence in asymptomatic patients who have finished initial treatment to eliminate the cancer unless there is high-level evidence that such imaging will change the outcome.

PET and PET-CT are used to diagnose, stage and monitor how well treatment is working. Available evidence from clinical studies suggests that using these tests to monitor for recurrence does not improve outcomes and therefore generally is not recommended for this purpose. False positive tests can lead to unnecessary and invasive procedures, overtreatment, unnecessary radiation exposure and incorrect diagnoses. Until high level evidence demonstrates that routine surveillance with PET or PET-CT scans helps prolong life or promote well-being after treatment for a specific type of cancer, this practice should not be done. *Source: American Society of Clinical Oncology (ASCO).*

The Purpose of This List

Starting in early 2015, the ASH Choosing Wisely Task Force launched a review of all existing Choosing Wisely items to identify recommendations published by other professional societies that are highly relevant and important to the practice of hematology. Using a carefully administered methodology, items were scored for relevance and importance over a series of iterations, resulting in a list of items that were deemed to be especially useful to hematologists. The items in this list represent the top five highest-scoring items. The full list of items is available on the ASH website at www.hematology.org/choosingwisely.

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How this List Was Created (Non-ASH Recommendations)

A two-phase process was developed to identify and rank non-ASH Choosing Wisely recommendations of relevance to hematologists. First, the ASH Choosing Wisely Task Force independently scored all published ABIM Foundation Choosing Wisely recommendations on the MORE reliability scale, a validated seven-point Likert scale used to assess medical relevance. Modified group technique was used to identify the top 50 unique non-ASH Choosing Wisely recommendations with regard to relevance. Overlapping recommendations from different societies were grouped together as one recommendation. Taking into consideration the core values of harm, cost, strength of evidence, frequency, relevance, and impact, the ASH Choosing Wisely Task Force was asked to score each of the remaining 50 Choosing Wisely recommendations between 1 and 10 for prioritization for inclusion on ASH's top 10 list of non-ASH Choosing Wisely recommendations. Harm avoidance was established as the campaign's preeminent guiding principle. Modified group technique was used to select the top 10 non-ASH Choosing Wisely recommendations of relevance and importance to hematologists and their patients, with the top five highest-ranked items presented in this list.

ASH's disclosure and conflict of interest policy can be found at www.hematology.org.

These items are provided solely for informational purposes and are not intended as a substitute for consultation with a medical professional. Patients with any specific questions about the items on this list or their individual situation should consult their physician.

Released December 2, 2015.

For more information or to see other lists of Five Things Physicians and Patients Should Question, visit www.choosingwisely.org.

Five Things Physicians and Patients Should Question

The American Society of Clinical Oncology (ASCO) is a medical professional oncology society committed to conquering cancer through research, education, prevention and delivery of high-quality patient care. ASCO recognizes the importance of evidence-based cancer care and making wise choices in the diagnosis and management of patients with cancer. After careful consideration by experienced oncologists, ASCO highlights ten categories of tests, procedures and/or treatments whose common use and clinical value are not supported by available evidence. These test and treatment options should not be administered unless the physician and patient have carefully considered if their use is appropriate in the individual case. As an example, when a patient is enrolled in a clinical trial, these tests, treatments and procedures may be part of the trial protocol and therefore deemed necessary for the patient's participation in the trial.

These items are provided solely for informational purposes and are not intended to replace a medical professional's independent judgment or as a substitute for consultation with a medical professional. Patients with any specific questions about the items on this list or their individual situation should consult their health care provider. New evidence may emerge following the development of these items. ASCO is not responsible for any injury or damage arising out of or related to any use of these items or to any errors or omissions.

1

Don't use cancer-directed therapy for solid tumor patients with the following characteristics: low performance status (3 or 4), no benefit from prior evidence-based interventions, not eligible for a clinical trial, and no strong evidence supporting the clinical value of further anti-cancer treatment.

- Studies show that cancer directed treatments are likely to be ineffective for solid tumor patients who meet the above stated criteria.
- Exceptions include patients with functional limitations due to other conditions resulting in a low performance status or those with disease characteristics (e.g., mutations) that suggest a high likelihood of response to therapy.
- Implementation of this approach should be accompanied with appropriate palliative and supportive care.

2

Don't perform PET, CT, and radionuclide bone scans in the staging of early prostate cancer at low risk for metastasis.

- Imaging with PET, CT, or radionuclide bone scans can be useful in the staging of specific cancer types. However, these tests are often used in the staging evaluation of low-risk cancers, despite a lack of evidence suggesting they improve detection of metastatic disease or survival.
- Evidence does not support the use of these scans for staging of newly diagnosed low grade carcinoma of the prostate (Stage T1c/T2a, prostate-specific antigen (PSA) <10 ng/ml, Gleason score less than or equal to 6) with low risk of distant metastasis.
- Unnecessary imaging can lead to harm through unnecessary invasive procedures, over-treatment, unnecessary radiation exposure, and misdiagnosis.

3

Don't perform PET, CT, and radionuclide bone scans in the staging of early breast cancer at low risk for metastasis.

- Imaging with PET, CT, or radionuclide bone scans can be useful in the staging of specific cancer types. However, these tests are often used in the staging evaluation of low-risk cancers, despite a lack of evidence suggesting they improve detection of metastatic disease or survival.
- In breast cancer, for example, there is a lack of evidence demonstrating a benefit for the use of PET, CT, or radionuclide bone scans in asymptomatic individuals with newly identified ductal carcinoma in situ (DCIS), or clinical stage I or II disease.
- Unnecessary imaging can lead to harm through unnecessary invasive procedures, over-treatment, unnecessary radiation exposure, and misdiagnosis.

4

Don't perform surveillance testing (biomarkers) or imaging (PET, CT, and radionuclide bone scans) for asymptomatic individuals who have been treated for breast cancer with curative intent.

- Surveillance testing with serum tumor markers or imaging has been shown to have clinical value for certain cancers (e.g., colorectal). However for breast cancer that has been treated with curative intent, several studies have shown there is no benefit from routine imaging or serial measurement of serum tumor markers in asymptomatic patients.
- False-positive tests can lead to harm through unnecessary invasive procedures, over-treatment, unnecessary radiation exposure, and misdiagnosis.

5

Don't use white cell stimulating factors for primary prevention of febrile neutropenia for patients with less than 20 percent risk for this complication.

- ASCO guidelines recommend using white cell stimulating factors when the risk of febrile neutropenia, secondary to a recommended chemotherapy regimen, is approximately 20 percent and equally effective treatment programs that do not require white cell stimulating factors are unavailable.
- Exceptions should be made when using regimens that have a lower chance of causing febrile neutropenia if it is determined that the patient is at high risk for this complication (due to age, medical history, or disease characteristics).

Five More Things Physicians and Patients Should Question

6

Don't give patients starting on a chemotherapy regimen that has a low or moderate risk of causing nausea and vomiting antiemetic drugs intended for use with a regimen that has a high risk of causing nausea and vomiting.

- Over the past several years, a large number of effective drugs with fewer side effects have been developed to prevent nausea and vomiting from chemotherapy. When successful, these medications can help patients avoid spending time in the hospital, improve their quality of life and lead to fewer changes in the chemotherapy regimen.
- Oncologists customarily use different antiemetic drugs depending on the likelihood (low, moderate or high) for a particular chemotherapy program to cause nausea and vomiting. For chemotherapy programs that are likely to produce severe and persistent nausea and vomiting, there are new agents that can prevent this side effect. However, these drugs are very expensive and not devoid of side effects. For this reason, these drugs should be used only when the chemotherapy drugs that have a high likelihood of causing severe or persistent nausea and vomiting.
- When using chemotherapy that is less likely to cause nausea and vomiting, there are other effective drugs available at a lower cost.

7

Don't use combination chemotherapy (multiple drugs) instead of chemotherapy with one drug when treating an individual for metastatic breast cancer unless the patient needs a rapid response to relieve tumor-related symptoms.

- Although chemotherapy with multiple drugs, or combination chemotherapy, for metastatic breast cancer may slow tumor growth for a somewhat longer time than occurs when treating with a single agent, use of combination chemotherapy has not been shown to increase overall survival. In fact, the trade-offs of more frequent and severe side effects may have a net effect of worsening a patient's quality of life, necessitating a reduction in the dose of chemotherapy.
- Combination chemotherapy may be useful and worth the risk of more side effects in situations in which the cancer burden must be reduced quickly because it is causing significant symptoms or is life threatening. As a general rule, however, giving effective drugs one at a time lowers the risk of side effects, may improve a patient's quality of life, and does not typically compromise overall survival.

8

Avoid using PET or PET-CT scanning as part of routine follow-up care to monitor for a cancer recurrence in asymptomatic patients who have finished initial treatment to eliminate the cancer unless there is high-level evidence that such imaging will change the outcome.

- PET and PET-CT are used to diagnose, stage and monitor how well treatment is working. Available evidence from clinical studies suggests that using these tests to monitor for recurrence does not improve outcomes and therefore generally is not recommended for this purpose.
- False positive tests can lead to unnecessary and invasive procedures, overtreatment, unnecessary radiation exposure and incorrect diagnoses.
- Until high level evidence demonstrates that routine surveillance with PET or PET-CT scans helps prolong life or promote well-being after treatment for a specific type of cancer, this practice should not be done.

9

Don't perform PSA testing for prostate cancer screening in men with no symptoms of the disease when they are expected to live less than 10 years.

- Since PSA levels in the blood have been linked with prostate cancer, many doctors have used repeated PSA tests in the hope of finding "early" prostate cancer in men with no symptoms of the disease. Unfortunately, PSA is not as useful for screening as many have hoped because many men with prostate cancer do not have high PSA levels, and other conditions that are not cancer (such as benign prostate hyperplasia) can also increase PSA levels.
- Research has shown that men who receive PSA testing are less likely to die specifically from prostate cancer. However when accounting for deaths from all causes, no lives are saved, meaning that men who receive PSA screening have not been shown to live longer than men who do not have PSA screening. Men with medical conditions that limit their life expectancy to less than 10 years are unlikely to benefit from PSA screening as their probability of dying from the underlying medical problem is greater than the chance of dying from asymptomatic prostate cancer.

10

Don't use a targeted therapy intended for use against a specific genetic aberration unless a patient's tumor cells have a specific biomarker that predicts an effective response to the targeted therapy.

- Unlike chemotherapy, targeted therapy can significantly benefit people with cancer because it can target specific gene products, i.e., proteins that cancer cells use to grow and spread, while causing little or no harm to healthy cells. Patients who are most likely to benefit from targeted therapy are those who have a specific biomarker in their tumor cells that indicates the presence or absence of a specific gene alteration that makes the tumor cells susceptible to the targeted agent.
- Compared to chemotherapy, the cost of targeted therapy is generally higher, as these treatments are newer, more expensive to produce and under patent protection. In addition, like all anti-cancer therapies, there are risks to using targeted agents when there is no evidence to support their use because of the potential for serious side effects or reduced efficacy compared with other treatment options.

Abbreviations

CT, computed tomography; DCIS, ductal carcinoma in situ; PET, positron emission tomography; PSA, prostate-specific antigen.

How This List Was Created (1–5)

The American Society of Clinical Oncology (ASCO) has had a standing Cost of Cancer Care Task Force since 2007. The role of the Task Force is to assess the magnitude of rising costs of cancer care and develop strategies to address these challenges. In response to the 2010 *New England Journal of Medicine* article by Howard Brody, MD, “Medicine’s Ethical Responsibility for Health Care Reform – the Top Five List,” a subcommittee of the Cost of Cancer Care Task Force began work to identify common practices in oncology that were both common as well as lacking sufficient evidence for widespread use. Upon joining the Choosing Wisely campaign, the members of the subcommittee conducted a literature search to ensure the proposed list of items were supported by available evidence in oncology; ultimately the proposed Top Five list was approved by the full Task Force. The initial draft list was then presented to the ASCO Clinical Practice Committee, a group composed of community-based oncologists as well as the presidents of the 48 state/regional oncology societies in the United States. Advocacy groups were also asked to weigh in to ensure the recommendations would achieve the dual purpose of increasing physician-patient communication and changing practice patterns. A plurality of more than 200 clinical oncologists reviewed, provided input and supported the list. The final Top Five list in oncology was then presented to, discussed and approved by the Executive Committee of the ASCO Board of Directors and published in the *Journal of Clinical Oncology*. ASCO’s disclosure and conflict of interest policies can be found at www.asco.org.

How This List Was Created (6–10)

To guide ASCO in developing this list, suggestions were elicited from current ASCO committee members (approximately 700 individuals); 115 suggestions were received. After removing duplicates, researching the literature and discussing practice patterns, the Value in Cancer Care Task Force culled the list to 11 items, which comprised an ASCO Top Five voting slate that was sent back to the membership of all standing committees. Approximately 140 oncologists from its leadership cadre voted, providing ASCO with an adequate sample size and perspective on what oncologists find to be of little value. The list was reviewed and finalized by the Value in Cancer Care Task Force and ultimately reviewed and approved by the ASCO Board of Directors and published in the *Journal of Clinical Oncology*. ASCO’s disclosure and conflict of interest policies can be found at www.asco.org.

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About the ABIM Foundation

The mission of the ABIM Foundation is to advance medical professionalism to improve the health care system. We achieve this by collaborating with physicians and physician leaders, medical trainees, health care delivery systems, payers, policymakers, consumer organizations and patients to foster a shared understanding of professionalism and how they can adopt the tenets of professionalism in practice.

To learn more about the ABIM Foundation, visit www.abimfoundation.org.



About the American Society of Clinical Oncology

The American Society of Clinical Oncology (ASCO) is the world's leading professional organization representing physicians who care for people with cancer. With more than 30,000 members, ASCO is committed to improving cancer care through scientific meetings, educational programs and peer-reviewed journals. ASCO is supported by its affiliate organization, the Conquer Cancer Foundation, which funds ground-breaking research and programs that make a tangible difference in the lives of people with cancer. ASCO's membership is comprised of clinical oncologists from all oncology disciplines and sub-specialties including medical oncology, therapeutic radiology, surgical oncology, pediatric oncology, gynecologic oncology, urologic oncology, and hematology; physicians and health care professionals participating in approved oncology training programs; oncology nurses; and other health care practitioners with a predominant interest in oncology.

For more information, please visit www.asco.org.



American Society of Clinical Oncology



American Society of Hematology Practice-Related Resources

ASH offers a wide range of practice-related resources on its website (www.hematology.org).

Below, please find a list of resources that may be of interest to you.

Resources for Clinicians (www.hematology.org/Clinicians/)

- [MACRA](#) – The ASH MACRA webpage is dedicated to keeping ASH members up-to-date on the Quality Payment Program (QPP), part of the Medicare Access and CHIP Reauthorization Act (MACRA). This page provides members with answers to frequently asked questions, links to comment letters ASH has submitted related to MACRA, and information on MIPS PRO, a 2018 Qualified MIPS Registry through which ASH members can submit MIPS data directly to the Centers for Medicare and Medicaid Services.
- [ASH Practice Partnership](#) - The ASH Practice Partnership (APP) is a group within the Society that was formed to better represent the interests of practicing hematologists. The APP is comprised of practicing hematologists from across the nation; participants must be board-certified in hematology and active members of ASH. Ideal candidates should be interested in malignant and nonmalignant hematology.
- [Drug Resources](#) - This page provides links to patient assistance programs and sample letters of appeal for high-cost drugs, links to REMS resources, an up-to-date list of hematologic drug shortages, resources for physicians dealing with shortages, and links to ASH/FDA webinars featuring an unbiased discussion of newly approved drugs and their uses.
- [Pediatric to Adult Hematologic Care Transitions](#) - This new webpage offers links to assessment and summary forms designed to facilitate discussion about patient transitions from pediatric to adult care.
- [Consult a Colleague](#) - A member service designed to help facilitate the exchange of information between hematologists and their peers.
- [ASH Choosing Wisely List](#) - Evidence-based recommendations about the necessity and potential harm of certain practices developed as part of Choosing Wisely®, an initiative of the ABIM Foundation.
- [ASH Clinical Guidelines, ASH Pocket Guides, and Hematology Quality Metrics](#) - Access guidelines on the management and treatment of Sickle Cell Disease, Acute Leukemia, Idiopathic Thrombocytopenic Purpura, Antithrombotic Drug Dosing and Management, Heparin-Induced Thrombocytopenia (HIT), Immune Thrombocytopenia (ITP), von Willebrand Disease, Red Blood Cell Transfusion, and Thrombocytopenia in Pregnancy.
- [Well-Being and Resilience](#) - Well-being is a critical factor in the strength of the workforce, and the Society is committed to helping hematologists address the myriad factors impacting well-being through interventions such as openly addressing burnout in live meetings and in publications, advocating on behalf of hematologists to streamline administrative work, and sharing approaches to building resilience among hematologists.

Advocacy Resources (www.hematology.org/advocacy/)

ASH's [Advocacy Center](#) houses all of the Society's policy positions, advocacy efforts, and campaigns. Hematologists and their patients can follow the latest national [policy news](#) and directly influence their representatives through [ASH Action Alerts](#). The Center also displays ASH's official [policy statements](#) along with [testimony and correspondence](#) related to federal regulation and private insurance developments.

- In August 2017, ASH launched a new online [advocacy toolkit](#) to provide members with the information and guidance necessary to communicate with elected officials in support of hematology. The new toolkit clearly and concisely explains how members can undertake a number of actions to support ASH's advocacy efforts.
- ASH recently launched a survey of all U.S. members to learn about what advocacy topics matter most to the Society's membership and the ways in which members would like to engage with their elected officials. If

you have not yet taken the survey but would like the opportunity to help shape the future of ASH's advocacy and policy efforts in Washington, please click [here](#).

- Action Alerts
 - [Contact Congress in Support of Sustained and Predictable Funding for NIH](#) - Reach out to your legislators to protect funding for non-defense discretionary (NDD) programs including the National Institutes of Health (NIH).
 - [Contact your Elected Officials to Support the Sickle Cell Disease Legislation](#) - Your elected officials need to hear from you to improve the life of patients living with Sickle Cell Disease.
 - [Urge your Representative to Support the Cancer Drug Parity Act](#) – Legislation has been introduced in the U.S. House of Representatives that would ensure that patients enrolled in certain federally regulated health plans have access and insurance coverage for all anti-cancer regimens. Your Representative needs to cosponsor this bill in order for it to be considered by the full Congress.

Sickle Cell Disease

ASH is undertaking a multifaceted initiative to address the global burden of sickle cell disease (SCD). In September 2016, the Society issued *the State of Sickle Cell Disease: 2016 Report*, which can be found on the [ASH SCD Initiative](#) page along with other ASH SCD priorities. This report outlines the most pressing areas of need and provides a blueprint to advance these actions. To address issues related to access to care, ASH is (1) implementing a strategy to educate hematologists and other health care providers in all settings to recognize and properly respond to SCD complications; and (2) pursuing payment reforms to encourage appropriate care for individuals with SCD. ASH also continues to expand the Society's [clinical SCD resources](#) and plans to release new SCD-related educational tools and guidelines over the next few years.

ASH Publications

- [Practice Update](#) - The *Practice Update* is the society's bimonthly e-newsletter reporting on breaking news and activities of interest to the practice community.
- [ASH Clinical News](#) - *ASH Clinical News* is a magazine for ASH members and non-members alike – offering news and views for the broader hematology/oncology community.
- [The Hematologist: ASH News and Reports](#) - An award-winning, bimonthly publication that updates readers about important developments in the field of hematology and highlights what ASH is doing for its members.
- [Blood](#) – *Blood* is a weekly medical journal published by the American Society of Hematology. With an impact factor of 15.132 (2017), *Blood* is the most cited peer-reviewed publication in the field of hematology.
- [Blood Advances](#) – *Blood Advances* is a semimonthly medical journal published by the American Society of Hematology. It is the first journal to join the *Blood* family in 70 years and is a peer-reviewed, online only, open access journal.
- [ASH-SAP](#) - *American Society of Hematology Self-Assessment Program, Sixth Edition*. This is the most comprehensive ASH Self-Assessment Program edition to date, with 7 multimedia components and 23 updated chapters that cover the latest advancements in benign and malignant disorders, laboratory hematology, transfusion medicine, and other areas of hematology.

Meeting Information (www.hematology.org/meetings/)

- [ASH Meeting on Hematologic Malignancies](#) – September 7-8, 2018, Chicago, IL. This event will allow you to hear top experts in hematologic malignancies discuss the latest developments in clinical care and to find answers to your most challenging patient care questions.
- [ASH Annual Meeting and Exposition](#) – December 1-4, 2018, San Diego, CA. The Society's Annual Meeting and Exposition is designed to provide hematologists from around the world a forum for discussing critical issues in the field. Abstracts presented at the meeting also contain the latest and most exciting developments in hematology research.
- [Consultative Hematology Course](#) – Thursday, September 6, 2018 in conjunction with the ASH Meeting on Hematologic Malignancies, or Monday, December 3, 2018 in conjunction with the ASH Annual Meeting.

This intensive half-day program focuses on updates in non-malignant hematology designed for practitioners who are trained as hematologists or hematologist-oncologists, but now see patients with non-malignant hematologic conditions on a less frequent basis.

- [Highlights of ASH](#) - This meeting is designed to provide the highlights of the top presentations from ASH's annual meeting.
- [Annual Meeting of the Hematology / Oncology Carrier Advisory Committee \(CAC\) Network](#)– July 26 – 27, 2018, Washington, DC. This annual event brings together the hematologists and oncologists who serve as representatives to regional Medicare Contractors, Medicare Contractor Medical Directors, leaders from hematology and oncology state societies, and members of ASH and ASCO practice committees. The meeting is intended to provide attendees with a better understanding of the CAC process; discuss issues of common concern and develop solutions; and improve the overall CAC process throughout the year.

Other ASH Activities and Resources

- [The ASH Academy](#) – The ASH Academy provides hematologists with easy-to-use options for knowledge testing (for both MOC and CME purposes), completing practice improvement modules, as well as evaluating ASH meetings you attend and claiming CME credit for participating. The sixth edition of the ASH Self-Assessment Program (ASH-SAP) is also available on the ASH Academy.
- [FDA](#) – ASH partners with the Food and Drug Administration to alert members on new approved hematologic therapies.
- [AMA](#) – ASH is an involved member in the American Medical Association's (AMA) activities such as the AMA House of Delegates (HOD), AMA Current Procedural Terminology (CPT) Committee, and RVS Update Committee (RUC).
- [Committee on Practice](#) - The Committee on Practice is concerned with all issues affecting the practice of hematology. The Committee communicates with other organizations that have programs and policies that affect hematology practice. With appropriate review and approval by the Executive Committee, the Committee on Practice responds to practice-related issues by formulating positions on pending federal legislation, regulatory issues, and private insurance developments. The Committee also responds to matters of importance at the regional, state, and local levels, and to Society member requests.

If you have any questions on this list or any of the programs, please contact Katherine Stark, Policy and Practice Coordinator at kstark@hematology.org.

ASCO[®] Clinical Affairs

YOUR PRACTICE IS OUR FOCUS



ASCO CLINICAL AFFAIRS

Our Focus

The American Society of Clinical Oncology (ASCO) is working—through research, education, and promotion of the highest quality patient care—toward a world where cancer is prevented or cured, and every survivor is healthy. With the goal of ensuring that all patients receive the high-quality care that they expect and deserve, ASCO is committed to helping your oncology practice thrive in the ever-changing, ever-demanding healthcare delivery system.

ASCO Clinical Affairs is your one-stop shop for the operations side of cancer care, from educational resources and practical tools to transition your practice to a value-based reimbursement system, to data and information to enhance your business operations and quality of care.

Established in 2014 and staffed by national leaders in clinical oncology care and practice management, ASCO Clinical Affairs supports practicing oncologists, oncology administrators, and oncology practices in all settings—large and small community practices, hospital-based oncology departments and practices, and those in academic and research institutions.

How We Can Help

ASCO's Clinical Affairs team is here to provide the educational tools, training programs, services, and resources you need to deliver high-quality, high-value care to your patients. We can help your practice with practice management, quality, and performance improvement. Our team can help you collaborate with practices across the United States, innovate your practice's delivery of cancer care, and respond to the growing economic and administrative challenges that all oncology practices face today.



PRACTICE MANAGEMENT SUPPORT

ASCO Clinical Affairs offers the insight, tools, and support to help you deliver the highest quality cancer care and thrive in the ever-changing business of health care.

ASCO PracticeNET

PracticeNET is a rapid learning network where oncology practices of all sizes and in all settings share and receive insights to make improvements to the patient experience while enhancing business operations. PracticeNET analyzes your practice data to tell you how your practice performance is trending, the effectiveness of your business practices, and how your practice compares to others. PracticeNET participation helps practices bolster practice operations and productivity; better allocate resources; identify billing and coding opportunities; and discuss best practices in oncology practice management. For more information, contact PracticeNET@asco.org.

ASCO PracticeNET™
Networking for Education and Transformation

Coding & Reimbursement Assistance

Do you have questions about oncology-related coding, billing, and reimbursement? ASCO has answers. ASCO members have access to ASCO's electronic coding and reimbursement service at asco.org/billingcoding.

MACRA & the Quality Payment Program

The Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) established the Quality Payment Program (QPP), which is transforming the way physicians are reimbursed for services provided under Medicare Part B. As your partner in preparing for these changes, ASCO has assembled a library of tools and information to help you implement the Quality Payment Program in your practice. Visit asco.org/macra.

Physician Payment Reform

ASCO has developed the Patient-Centered Oncology Payment (PCOP) model, an alternative payment model designed for oncology. PCOP fundamentally restructures the way oncologists are paid for cancer care in the United States and addresses one of the major problems in today's fee-for-service system: inadequate payment for the wide range of services critical to supporting patients with cancer and managing complex illnesses. PCOP also includes a much more streamlined quality reporting requirement than the Oncology Care Model. ASCO is proposing to Centers for Medicare & Medicaid Services (CMS) that PCOP be approved as an Advanced Alternative Payment Model and has developed tools to help practices achieve success under PCOP or any other alternative payment model.

**ASCO® Patient-Centered
Oncology Payment**

FDA Alerts

ASCO partners with the U.S. Food and Drug Administration (FDA) to alert members on newly approved therapies for cancer patients to ensure you are current with the most effective, safest treatments available.

Influencing the Cancer Care Delivery System

ASCO Clinical Affairs brings together ASCO members and key stakeholders to influence policies that affect practice management. Join us and make your voice heard!

- **ASCO's Clinical Practice Committee:** ASCO Clinical Affairs supports ASCO's Clinical Practice Committee (CPC), a diverse group of community oncologists who provide leadership across a wide range of current practice issues, including physician reimbursement, clinical pathways in oncology, chemotherapy safe handling, and coding and billing concerns.
- **ASCO's Oncology Administrator Workgroup:** The Oncology Administrator Workgroup, supported by ASCO Clinical Affairs and guided by the CPC, is tasked with identifying issues facing oncology practices and providing a forum for discussion and evaluation of solutions. This group has addressed a wide range of practice issues, including insurance pre-authorization, outreach to administrators, practice needs assessment, and more.
- **AMA Activities:** ASCO participates in American Medical Association (AMA) activities such as the AMA House of Delegates, AMA CPT Advisory Committee, and AMA Relative Value Update Committee Advisory Committee to provide oncology-specific leadership in these influential decision-making entities.

Survey of Oncology Practice Operations

ASCO conducts an annual Survey of Oncology Practice Operations (SOPO) to capture the current state of business and operational issues in oncology to help practices navigate the evolving cancer delivery system.

Participation in this survey allows practices to compare their operations to national benchmarks. For more information contact

clinicalaffairs@asco.org.

ASCO Survey of Oncology
Practice Operations

ASCO® Practice Consulting Services & Support

ASCO Clinical Affairs provides cross-cutting consulting services by nationally recognized oncology experts, offering comprehensive, personalized support to oncology practices across the United States.

Services include:

- **Readiness assessment**, preparing practices for value-based care, new payment models and success in the Quality Payment Program
- **Practice operational assessment**, focused on the highest standards of care with review of patient flow, practice services, personnel, and physical space – resulting in actionable recommendations for practice success
- **Practice transformation implementation support**, personalized consulting services designed to meet your practice's specific needs
- **Analytical services**, providing support with practical data analytics - clinical, financial and operational
- **Triage pathways**, a decision support tool to help your patients get the right care at the right time in the right place. ASCO Consulting Services can help you prepare for effective implementation of triage pathways.

Practice Engagement Program

ASCO's new Practice Engagement Program provides a single point of contact for practices to help them identify and connect with the ASCO tools, programs, and resources that can best support their needs. After understanding the needs of each specific practice, the Practice Engagement Team can identify the ASCO resources to help resolve outstanding challenges, prepare for pending changes, and succeed in an ever-changing practice environment. Contact clinicalaffairs@asco.org for more information or assistance.

Data Analysis

ASCO Clinical Affairs Data Warehouse

Unlock valuable data to help your practice provide high-quality cancer care with ASCO's Clinical Affairs Data Warehouse. The data warehouse includes publicly available Medicare data, as well as previously unavailable survey and practice data, that the ASCO team uses to assist practices and support policy positions.

ASCO Practice Central

ASCO Practice Central is the first ASCO website dedicated to the business of oncology. The new website provides one centralized, convenient place for oncology professionals to easily find resources on business services, quality improvement, hiring and recruitment, staff burnout, reimbursement, and other topics to help their practice succeed. Visit practice.asco.org.

ASCO® Practice Central

QUALITY AND PERFORMANCE IMPROVEMENT

We know your practice is constantly striving to deliver the highest quality care possible to your patients.

Cancer programs and practices need to focus their quality strategies on high-impact metrics that will reflect quality, costs, health care utilization, and patient outcomes. ASCO Clinical Affairs offers unique opportunities to help enhance your quality assessment activities, understand quality and value, and provide you with information and tools to focus your resources to improve your practice performance.

ASCO Quality programs are expanding internationally. QOPI® is available to ASCO member practices in a number of countries outside the United States, and practices have achieved international QOPI® Certification and participated in the Quality Training Program.

QOPI®

The Quality Oncology Practice Initiative (QOPI®) is an oncologist-led, practice-based quality assessment program designed to promote excellence in cancer care by helping practices create a culture of self-examination and improvement. QOPI® provides a comprehensive library of measures, developed and adapted by oncologists and the oncology community, that allows your practice to reliably assess your care and demonstrate your quality to your patients and external stakeholders. QOPI® participants are also well-positioned to meet external reporting requirements for payers and the government and to participate in new payment models focused on quality. Please contact qopi@asco.org for more information or assistance.

QOPI® Certification Program

QOPI® Certification recognizes medical oncology and hematology practices that are committed to delivering the highest quality of cancer care. QOPI® Certification provides a three-year certification to outpatient oncology practices of all sizes and types by evaluating performance in clinical areas that affect patient care and safety. For more information or assistance, please contact: qopicertification@asco.org.

QOPI® Reporting Registry

The QOPI® Reporting Registry, a Qualified Clinical Data Registry (QCDR), brought to you by ASCO and the American Society for Radiation Oncology (ASTRO) is the one stop shop for 2018 MIPS reporting. Practices can use either the System Integrated Approach to report electronically via their EHR or the Web Interface Tool to enter data manually to satisfy 2018 MIPS reporting requirements in the Quality, Improvement Activities, and Advancing Care Information categories.

Quality Training Program

The ASCO Quality Training Program empowers practice teams to improve clinical care and operational performance and teaches teams how to balance Quality improvement projects with demanding schedules and competing priorities. The training employs proven experiential learning techniques with a quality issue selected by the oncology team. It will enhance practical team skill-building, help teams prepare for a changing reimbursement environment, and includes support when the team returns to the primary institution. The course is five days over six months and offers CME and MOC Part IV credits.

1-Day Quality Improvement Workshop

ASCO's 1-day Introduction to Quality Improvement Workshop focuses on defining a problem, mapping the process for improvement, identifying the cause, implementing the solution and sustaining the gain. Members of the Quality Training Program faculty will present basics on-site at practices who want to educate more staff in clinics.

For more information or assistance on the Quality Training Program or 1-day Workshop, email: qualitytraining@asco.org.

ASCO CLINICAL AFFAIRS TEAM



Stephen Grubbs, MD

ASCO Clinical Affairs is led by Vice President of Clinical Affairs Stephen Grubbs, MD, who joined ASCO in 2015 after 31 years as a medical oncologist and managing partner of an independent practice in Newark, Delaware, at the Helen F. Graham Cancer Center.



Walter Birch, MBA, CMPE

Walter Birch leads the Practice Management, Resources, Performance Improvement, and Quality Certification Team. Prior to joining ASCO, he worked in all aspects of physician practice management and consulting, including running national divisions of private and public companies employing physicians, managing hospital-owned physician practices, and leading physician-owned private practices.



Elaine L. Towle, CMPE

Elaine Towle joined the Clinical Affairs Team as Director of Analysis and Consulting Services after working as Director of Consulting Services for Oncology Metrics where she developed programs and services focused on clinical, financial, and operational excellence for community oncology providers. She is a former oncology administrator and past consultant editor for ASCO's *Journal of Oncology Practice*.

About ASCO

Founded in 1964, the American Society of Clinical Oncology (ASCO) is committed to making a world of difference in cancer care. As the world's leading organization of its kind, ASCO represents nearly 45,000 oncology professionals who care for people living with cancer. Through research, education, and promotion of the highest-quality patient care, ASCO works to conquer cancer and create a world where cancer is prevented or cured, and every survivor is healthy. ASCO is supported by its affiliate organization, the Conquer Cancer Foundation. Learn more at www.asco.org, explore patient education resources at www.Cancer.Net, and follow us on Facebook, Twitter, LinkedIn, and YouTube. For policy-related developments, visit ascoaction.asco.org.

Contact Us

For more information about ASCO Clinical Affairs, please visit ASCO Practice Central at practice.asco.org or email clinicalaffairs@asco.org.

For information about all ASCO programs and resources visit asco.org.

ASCO[®]

AMERICAN SOCIETY OF CLINICAL ONCOLOGY

MAKING A WORLD OF DIFFERENCE IN CANCER CARE

Meeting Evaluation Form

ASH and ASCO are committed to providing the highest quality for the CAC Network Meeting. To assist in meeting that goal, we ask that you please complete the following confidential survey and provide any comments or suggestions you may have.

DEMOGRAPHIC INFORMATION

I am (please check all that apply)

- The oncology CAC representative/alternate for my state.
- The hematology CAC representative/alternate for my state.
- The president (or another physician representative) of my state oncology society.
- The executive director/administrator of my state oncology society.
- A member of ASCO's Clinical Practice Committee.
- A member of ASH's Committee on Practice or ASH's Subcommittee on Reimbursement.
- A Medicare contractor medical director.
- An invited meeting speaker.

Evaluation Key

5	4	3	2	1
Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree

Please indicate the degree to which you agree with the statements in each section below by placing a check mark on **5 (strongly AGREE)** to **1 (strongly disagree)** for each statement.

1. Welcome Reception

WELCOME RECEPTION	1	2	3	4	5
The Welcome Reception provided an opportunity to network with other CAC representatives, state society representatives, contractor medical directors and committee members.					
The format of the Welcome Reception was a valuable addition to the meeting.					

2. Group Dinners

GROUP DINNERS	1	2	3	4	5
The group dinners provided the additional opportunity to network with other CAC representatives, state society representatives, committee members, and contractor medical directors.					
The size of the dinner group was appropriate for networking.					
I enjoyed the additional opportunity to network with other CAC meeting attendees.					

3. General Meeting

GENERAL MEETING	1	2	3	4	5
I learned new information or obtained a better understanding of a particular issue or topic.					
The topics discussed are important to my role as a CAC representative, state society representative or committee member.					
There were adequate opportunities for questions and answers or discussions of topics.					
The contractor medical director participation in the meeting was helpful in obtaining feedback on important issues.					
The written materials and resources provided in the binder were a helpful supplement to the discussions.					
The length of the meeting was appropriate.					
The meeting facility was conducive for the meeting format/structure.					

4. Presentations/Speakers

Please rate the usefulness of the following presentations as they relate to coverage/reimbursement:

PRESENTATION/SPEAKERS	1	2	3	4	5
Biosimilars by Dr. Jeffrey Crawford					
Next Generation Sequencing by Dr. Katherine Szarama					
Evidence Based Medicine by Dr. Arthur Lurvey					
CAR-T Cellular Therapy by Gary Goldstein					
Financial Implications of CAR-T Cell Therapies by Dr. Samuel Silver					

Additional Questions:

1. If you participated in the CAC101 session this morning, what did you find most helpful?

2. What aspect(s) of the CAC Network Meeting do you find most valuable?

3. What aspect(s) of the CAC Network Meeting are most in need of improvement? (Please be specific.)
4. What topics or themes would you like to see addressed at future meetings?
5. Overall, how would you rate the CAC Network Meeting? (Please choose one.)
- A) Excellent B) Good C) Fair D) Poor
6. Is the current format of the CAC Network Meeting effective? (Please circle one): YES or NO
- If you circled NO, please provide additional/alternative ways ASH and ASCO can make the meeting more effective.
7. Are there any additional resources ASH and ASCO can provide to assist you with the local coverage process?

**** Thank you for your input! Please leave the evaluation form on your table. If you are unable to complete the form onsite, please e-mail the form directly after the meeting to ASH staff, Katherine Stark at kstark@hematology.org****



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**AMERICAN SOCIETY OF HEMATOLOGY and
AMERICAN SOCIETY OF CLINICAL ONCOLOGY
2018 CAC Network Meeting
Travel Reimbursement Policy**

The ASH-ASCO CAC Network Meeting Travel Reimbursement Policy is provided to travelers to provide guidance on the reimbursement for costs incurred in order to participate in the CAC Network Meeting. It is expected that the policy will be adhered to explicitly.

ASCO and ASH will reimburse the following groups for their attendance:

- CAC representatives and alternate representatives for hematology and oncology;
- Members of the ASCO Clinical Practice Committee and ASH Committee on Practice;
- Two representatives from the Hematology/ Oncology State Society*
- Medicare Contractor Medical Directors (CMDs) for all A/B MAC jurisdictions.

**Only two representatives from the state society (excluding CAC representatives) will be reimbursed for attending the ASH/ASCO CAC Network Meeting. State hematology/oncology society presidents and administrators/executive directors should determine who will attend the meeting. If more than two individuals from the state society (excluding CAC representatives) attend the meeting, reimbursement will be the responsibility of the state society or individual.*

Coverage begins at the actual start of a trip, whether it is from the traveler's regular place of employment, home, or other location, and terminates when the traveler reaches his/her original destination. Expenses for spouses and/or dependents are personal expenses and are not reimbursable.

Original receipts for all expenditures (including E-ticket passenger receipts, taxis, and parking) of **\$25.01 or more** must be included with the CAC Network Meeting Expense Reimbursement Form. Requests for reimbursement must be submitted within **thirty (30)** days of the meeting for which reimbursable expenses were incurred. The approved reimbursement will be issued by check.

Air/Train Travel

ASH and ASCO will pay for coach class airline tickets (not business or first class), purchased through the ASH travel agency EWA Travel. Airline or train reservations should be made using ASH's travel agent, EWA Travel. Tickets are to be booked at least 30 days in advance of the meeting dates for domestic attendees (no later than June 22). Please contact Marika Delgado at EWA via email at ASH@ewatravel.com or by phone at 1(800) 705-8580.

ASH and ASCO will reimburse the most economical non-refundable coach fares available on a major airline carrier (American, Delta, Southwest, United, U.S. Airways, etc.). When a significantly less



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expensive option is available, reservations made with a particular carrier to benefit the traveler will not be reimbursed in full; rather, the amount reimbursed will equal the amount of the equivalent ticket on the most economical carrier.

If an approved traveler wants to bring a guest, they must provide the ASH travel agent with a personal credit card for the guest's travel.

Ground Transportation

ASH and ASCO encourage the use of the most economical ground transportation to and from the airport or train station and will reimburse such expenses.

Use of a personal or university vehicle will be reimbursed at the mileage rate consistent with IRS rules and regulations (**\$0.54 cents per mile as of 1/1/16, including gasoline**) plus toll and parking charges. (ASH and ASCO will reimburse parking charges and mileage as long as this amount is not greater than the cost of roundtrip taxi or shuttle service.)

If ASH and ASCO approve the use of a rental car, limits will be set and communicated to the traveler by the appropriate ASH or ASCO representative. The maximum rates set by ASH and ASCO take into account the cost of the rental, mileage, gasoline, parking, tolls, and any other expenses related to the use of the rental in order to attend the meeting.

Hotel

One night hotel stay will be provided for by ASH and ASCO. Additional nights can be reserved but the attendee will be responsible for the extra stay. (Individuals that would require two nights based on flight options and/or destinations must contact ASH or ASCO staff prior to making the reservation.)

The traveler is responsible for promptly submitting the [RSVP Survey](#) as requested by the ASH representative handling hotel room block arrangements. **Surveys are due June 22.**

Meals

Meals that are not provided during the meeting will be covered with the following limits including tax and tip:

Dinner	\$75.00
Lunch	\$40.00
Breakfast	\$25.00

ASCO and ASH provide breakfast and lunch for Friday, July 27. Expenses incurred by attendees for either of these meals will not be reimbursed.



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Cancellations and Changes

When a traveler needs to change or cancel an airline reservation, he/she must contact the issuing agent and notify the appropriate ASH or ASCO representatives **immediately**. Unless the change or cancellation is approved by ASH or ASCO, the traveler is responsible for all penalty fees and any other charges incurred due to such changes or cancellations. If the traveler does not inform the travel agency or airline of the cancellation prior to the scheduled departure time, and the ticket is thereby rendered unusable for future travel, then the traveler will be held responsible for the cost of the original ticket.

If a traveler needs to change or cancel a hotel reservation, he or she must contact the appropriate ASH or ASCO representative at least 72 hours prior to his/her originally scheduled arrival. The traveler is responsible for reimbursing ASH and ASCO for expenses incurred due to last-minute changes, cancellations, no-shows, and early departures.

Miscellaneous Expenses

- Baggage service, up to a maximum of one checked bag per flight and similar expenses are reimbursable.
- Internet service, up to \$14 per day is reimbursable while attending the CAC Network Meeting.
- Tips not included with meals or cab fare should be listed separately on the CAC Network Meeting Expense Reimbursement Form.
- When a trip involves traveling for both the CAC Network Meeting and other purposes, the traveler must reasonably allocate the costs between CAC Network Meeting and the other activity.

If a traveler has any questions concerning any other reimbursable expenses, he/she should contact the appropriate ASH or ASCO representative.



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2018 ASH/ASCO CAC Network Meeting Expense Reimbursement Form

Please fill out the information below and attach original receipts.
All forms must be submitted by August 27, 2018

Make check payable to: _____

Mail check to: _____

Meeting Attended: 2018 ASH/ASCO CAC Network Meeting

Signature: _____ Date: _____

Itemized Expenses:

Date	Description of Expense	Account (<i>internal use only</i>)	Amount
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____

For ASH Use Only: Approval: _____ Date Submitted to Accounting: _____
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Please return completed form and original receipts by August 27, 2018 to:

Katherine Stark
American Society of Hematology
2021 L Street NW, Suite 900,
Washington, DC 20036
202-292-0252
kstark@hematology.org