



## President's Message



*Madelaine A. Feldman,  
CSRO President*

As the new year begins, I would like to reflect on the tremendous organizational successes that CSRO achieved in 2018. Over the past couple of years, CSRO made a commitment to deepening its ties with the societies it represents, and its allied patient and provider organizations. This year CSRO traveled to 20 state society meetings to bring increased awareness to the issues impacting practicing rheumatologists and patients in the U.S. We helped to grow our community by assisting in the formation of new state rheumatology societies, and began offering a host of new advocacy resources for member organizations such as our advocacy grant, office tour initiative, and action alert platform.

In particular, I would be remiss not to thank Dr. Michael Stevens, immediate past president, for all of the work he has done in spearheading these initiatives, and helping to lead our organization over the last 3 years. I hope that I will be able to fill his shoes, and those of all the past presidents who have shaped CSRO into the leading rheumatology advocacy organization that it is today.

While much progress has been made in bringing rheumatology's voice to the fore in numerous forums, CSRO anticipates more challenges ahead. We have spearheaded the legislation in Indiana on Non-medical Switching and will continue to support reforms such as step-therapy legislation that respects and enhances the doctor-patient relationship. We also expect accumulator programs to be a growing issue for patients in 2019. In addition to raising awareness about these programs among physicians, we have moved forward in examining solutions alongside interested stakeholders.

CSRO has also been keeping busy at the Federal level, with CMS announcing a slew of policies that affect Rheumatologists and our patients. Independently and alongside coalition efforts, CSRO actively engaged lawmakers and CMS personnel to oppose changes such as implementation of step-therapy in Medicare Advantage, the consolidation of levels 2-5 E&M codes, the current format of proposed changes to Part B drug reimbursement, and more. CSRO remains committed to protecting patients' access to medically necessary treatment, and will continue to prioritize federal advocacy efforts in Washington. I am also pleased to report that CSRO, through the Alliance for Transparent and Affordable Prescriptions, is making significant headway in raising awareness about the role the rebate system plays in inflating the cost of prescription drugs.

We are extremely excited to host our upcoming annual Fellows Conference that will be held on February 9th in San Francisco. Each year participation at this conference grows, and we look forward to this year's program being our most successful to date. I hope you will join CSRO in reaching out to Fellows interested in learning more about the practice issues they will have to navigate that aren't taught in Medical School.

I invite you to take steps in 2019 to increase your advocacy efforts in your home state and utilize the invaluable valuable resources CSRO provides for its membership. Please reach out to CSRO staff if you need any assistance with activating your advocacy efforts.

As our plans for the 2019 Legislative season take shape, we look forward to the continued participation of physicians, advocacy groups, and patients. In collaboration, I look forward to achieving even more successes for CSRO legislative platform in the coming year. As always, you can visit our website, [CSRO.info](http://CSRO.info) for information pertaining to our events and advocacy efforts. I look forward to working with you in 2019.

Sincerely,

Madelaine A. Feldman, MD, FACR  
CSRO President

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### THE COALITION OF STATE RHEUMATOLOGY ORGANIZATIONS

Since it was founded in 2003, CSRO's mission has been to advocate for excellence in the field of rheumatology.

# 2018 State Society Advocacy Conference (SSAC)

CSRO hosted many members of state rheumatology societies and other partners in Chicago on Saturday, September 15, 2018 for the annual State Society Advocacy Conference (SSAC). Each year this conference represents an opportunity for rheumatologists across the country to discuss issues affecting patients and their practices, connect with allies and partners, learn about emergent access issues, and discover useful tools rheumatologists can utilize in their advocacy efforts. The 2018 conference was perhaps the most successful to date with robust attendance and a program covering a diverse array of important topics.



Attendees got a behind the scenes glimpse into utilization management and pharmacy benefit manager related legislation from state lawmakers, heard the latest on federal regulatory and payment issues, and parsed the future landscape for biosimilars with perspectives from the FDA and the medical community, and more. CSRO was extremely excited to host Charlie Cook, editor of the nationally renowned Cook Political Report, to deliver the conference's keynote address.

CSRO thanks everyone who traveled to Chicago for this year's conference and hopes to see you again next year on September 13th and 14th back at the Westin Chicago O'Hare.

For those that missed this year's conference, you're not out of luck. Presentations and videos from our past State Society Advocacy Conferences can be found on the [CSRO website](#).

## Alliance for Transparent and Affordable Prescriptions: Year in Review & Looking Ahead



2018 was a remarkably successful year for the Alliance for Transparent and Affordable Prescriptions. ATAP helped to spearhead a national conversation regarding transparency in the pharmaceutical supply chain.

The awareness that ATAP helped raise translated into action across the country. Numerous bills were passed that banned "gag clauses" in Statehouses across the country. As a result of ATAP's efforts, two federal measures ATAP advocated for were signed into law in October. The *Know the Lowest Price Act* and *Patients' Right to Know Drug Prices Act* aim to improve consumer access to drug price information by banning gag clauses for Medicare and commercial beneficiaries. While these bills are undeniably beneficial for patients, more legislation is needed to ensure that greater transparency is brought to the pharmaceutical rebate system, allowing policymakers to act appropriately.

To that end, ATAP supported legislation across the states requiring pharmacy benefit managers to register with a relevant state agency. These measures serve as an excellent starting point for state government to ensure that PBMs do not engage in anticompetitive practices that harm patients.

As we look to 2019, ATAP plans to build on momentum built from media attention and legislative success by working directly in select states to implement more stringent definitions and transparency requirements for the rebate system. ATAP's previous success raising the profile of problems within the pharmaceutical supply chain has set the stage for this more direct approach. Our efforts will not be without their challenges, but we hope to significantly advance the conversation on these issues.

### STAY CONNECTED

Stay connected with CSRO online  
via our website at [CSRO.info](#)

# CSRO Attends the American College of Rheumatology 2018 Annual Meeting



Every year the American College of Rheumatology Annual Meeting (ACR) represents the largest gathering of rheumatology physicians and professionals, making it an outstanding opportunity for CSRO to speak to and hear from the rheumatology community.

To take advantage of the opportunity, CSRO hosted a booth in the ACR exhibit hall. Attendees that stopped by the booth were able to get details about their state societies next meeting, learn more about CSRO's advocacy initiatives, and tell us what they advocate for at our photo booth (pictured right).



CSRO also hosted a breakfast for state society leaders during the conference. Attendees heard CSRO's latest intel on upcoming legislative initiatives and how they can get connected, received details on the new resources CSRO is offering, and heard from a speaker who discussed compliance and implementation issues for patient access legislation.



CSRO board members also used this opportunity to discuss some of the new resources that the organization offers to its members. CSRO is now offering a grant to state societies seeking to build their advocacy capacity, and will help members set up meetings with their state legislators as part of the news tours initiative. More info can be found on the [CSRO website](#), or you may email [info@csro.info](mailto:info@csro.info) with any inquiries.

## CSRO Grant Program

Earlier this year, CSRO launched an initiative to formalize its membership process. Our hope is that this effort will strengthen the relationship between CSRO and its members and also prompt state organizations to participate more actively within CSRO. CSRO is made up of state and regional rheumatology societies and our mission is to support you in turn.

We would like to thank the 27 states societies who have formalized their relationship with us thus far. We are pleased to offer these member societies a wealth of resources to help support their individual society mission and goals. CSRO monitors state and federal legislation, works with state societies to submit comments and provide testimony on key issues, and provides its members informational materials for both patients and legislators. Beginning immediately, CSRO will also offer grants to member societies to help fund their own advocacy initiatives.

CSRO has set aside funding for member societies to assist with advocacy efforts at the state level. Funds may be used for specific advocacy activities including, but not limited to:

- Sponsored advocacy day at the state capitol
- Advocacy training for member rheumatologists
- Conference registration fees
- Specific issue webinar development

To be considered for a CSRO Advocacy Grant, member societies must complete an application and submit to the CSRO Executive Office. Member societies may submit an application to fund any activities that support advocacy for issues that affect rheumatologist members.

Make sure to attend the CSRO Annual Business Meeting at the 2018 State Society Advocacy Conference to learn more about the grant process and the criteria for receiving a grant. Applications and more information can also be found on the [CSRO website](#).



# United Health Group Downcoding for Administration of Certain Biologics

This fall, United Health Group announced changes to its Injection and Infusion Services Policy for commercial plans that would reduce reimbursement for the administration services provided in conjunction with certain biologic response modifiers. Prior to the announced downcoding, these administration services were reimbursed as “complex” under chemotherapy administration codes. United Health’s intent to reimburse these services as “simple” was inconsistent with the additional resources rheumatology providers dedicate to preparation and monitoring when administering the drugs in question.

**Table 1: UHC Coordinated Commercial Reimbursement Policy Announcement**

POLICY	EFFECTIVE DATE	MEMBERSHIP PLANS IN SCOPE	SUMMARY OF CHANGE
Injection and Infusion Services	Dec. 1, 2018	Commercial	<p>The Injection and Infusion Services Policy will be updated to require that therapeutic infusion codes (96365 and 96366) be reimbursed instead of chemotherapy codes (96413 and 96415) when reported with specific medications.</p> <p>Initially, the change will apply to the following four medications:</p> <ul style="list-style-type: none"> <li>▪ J3380 Injection, vedolizumab, 1 mg (Entyvio)</li> <li>▪ J0129 Injection, abatacept, 10 mg (Orencia)</li> <li>▪ J3262 Injection, tocilizumab, 1 mg (Actemra)</li> <li>▪ J1602 Injection, golimumab, 1 mg (Simponi)</li> </ul>

Table 1 contains a summary of the change to UnitedHealthcare’s Injection and Infusion Services Policy.<sup>1</sup>

CSRO is opposed to the arbitrary downcoding of administration services for certain biologic response modifiers because it would limit physicians’ financial ability to provide these drugs in office, therein posing a threat to patients’ access to critical treatments.

In October, CSRO was joined by many of the state societies on a letter to United Health opposing the change. This letter was sent alongside letters from many of CSRO’s allies and partners who shared CSRO’s concerns.

As a direct result of this advocacy United Health announced that the policy had been placed under further review and would not be implemented on December 1st as previously announced. This success reaffirms the importance of our mission to give voice to rheumatologists across the country.

CSRO will continue to oppose unwarranted reductions in reimbursement for the administration of intravenous biologics and will continue to monitor the situation for its membership. Our full comments can be accessed on the [CSRO website](#).

## CHLI Congressional Briefing Policy Series

CSRO President, Dr. Madelaine Feldman, was a panelist at the Congressional Hispanic Leadership Institute (CHLI)’s Value of Medicine Briefing held on Capitol Hill on November 14th. The briefing was part of a series that features national and international leaders and experts from all sectors to provide input on a number of pressing national issues. Dr. Feldman contributed to the in-depth discussion by discussing how the rheumatology practice provides value to individuals and society as a whole, and how that impact can be quantified moving forward.



## CSRO Attends NORM Conference



In October, CSRO enjoyed the networking opportunities provided at the National Organization of Rheumatology Managers Conference (NORM) in Tampa, FL. The theme for this year’s conference was “The Hidden Treasures of Rheumatology: Charting a New Course in Rheumatology.” Enhancing advocacy in rheumatology is a shared mission of NORM and CSRO. Many physician and rheumatology management professional attendees visited our table to learn more about how to get involved in meaningful ways to impact health policies that affect patient care.

# FDA's Public Hearing on "Facilitating Competition and Innovation in the Biological Products Marketplace"

CSRO President, Dr. Madelaine Feldman, was afforded the opportunity at this hearing to address what would engender confidence in physicians when prescribing biologic and biosimilar medications, and how the FDA could contribute to the effort. Dr. Feldman suggested that with the reduction of regulatory emphasis on clinical studies - real world evidence was needed to demonstrate biosimilarity, drug efficiency, and safety. Furthermore, Dr. Feldman pointed out that the problem with access to medications is really occurring after FDA approval. Availability and market penetration has lagged behind the FDA's review process. Feldman proposed that the FDA clarify its policy with respect to the alternating and switching between products; citing the example of how Biosimilar A and B are not interchangeable with each other despite the fact that these drugs are interchangeable with the reference product.

## Accumulator Adjustment Program Update



Accumulator Adjustment Programs have become an increasingly prevalent issue since CSRO was first made aware of them in late 2017. Since then, the programs have been progressively crossing over from the employer to commercial space.

Accumulator Adjustment Programs, also known as "out-of-pocket protection" or "coupon adjustment" programs, are a new utilization management tool being used by insurers and pharmacy benefit managers. These alternative cost-sharing structures prevent the value of co-pay assistance from being applied towards a patient's deductible as an out-of-pocket expense. In the past, once the value of a patient's co-pay assistance was depleted, a patient's deductible had been met, ensuring they could afford otherwise financially inaccessible drugs.

Due to the move towards high deductible health plans, and the inherent costliness of the drugs used to treat complex chronic conditions, most patients will not be able to afford their medication once the co-pay card benefit is exhausted, and they are forced to start paying off untenable deductible amounts. This will result in otherwise stable patients discontinuing their treatments, allowing for irreversible disease progression, flares, loss of effectiveness for their original therapy, and other adverse effects.

Most recently CSRO's President, Dr. Madelaine Feldman, presented at the CBI Copay Accumulator Summit in Philadelphia. Her presentation focused on how stakeholders can address patient adherence concerns resulting from accumulator programs. Dr. Feldman's presentation to the conference provides an extremely comprehensive overview of the current landscape for accumulator programs and potential solutions that stakeholders can examine. One of the particular difficulties identified by Dr. Feldman was the many different names for these programs. Some plans refer to the program as an "Out-of-Pocket Protection Program," others by "Coupon Adjustment Programs," and some refer to them as something else entirely. This makes it difficult for patients to know whether they are subject to an accumulator program. Selecting coverage for these patients becomes a minefield that potentially exposes them to surprise bills.

Dr. Feldman stressed that it was important for physicians to speak with their patients about this emergent access issue that could impact their adherence so that they can make decisions that ensure they continue receiving the highest quality care possible. Among other methods, Dr. Feldman recommended posting information about the programs on waiting room television monitors, making handouts available to patients, or directing them to CSRO's website. If you would like assistance putting together information to disseminate to your patients on accumulator adjustment programs, please contact CSRO at [info@csro.info](mailto:info@csro.info). You can also find out more information on the [CSRO website](#).

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# REGISTER TODAY! CSRO 2019 Fellows Conference

Saturday, February 9, 2019

Sheraton Fisherman's Wharf Hotel | San Francisco, CA

Register online for the **CSRO 2019 Fellows Conference**, Saturday, February 9, 2019, at the Sheraton Fisherman's Wharf Hotel in San Francisco!

The annual Fellows Conference is developed to help fellows-in-training successfully transition into their future roles as practicing rheumatologists. The conference focuses on critical issues and skills not taught in training and will be useful for anyone pursuing a career in academics, large medical groups, or solo practices.

We offer a scholarship of up to \$1,250 for travel and board to all fellows in attendance. For instructions and to download the Fellows Expense Form, visit our **Expense Reimbursement page**.

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