

CMS Goes Ahead With National Provider Identifier

BY JOEL B. FINKELSTEIN
Contributing Writer

WASHINGTON — Medicare has stopped accepting claims that contain outdated provider identifying numbers, even if the claims also include a National Provider Identifier, despite concerns voiced by physician groups that many are still not ready.

The original deadline for switching to exclusive use of the National Provider Identifier (NPI) was May 23, 2007, but the Centers

for Medicare and Medicaid Services gave the medical community another year to prepare. According to the agency's statistics, nearly 99% of claims were already being submitted with an NPI. However, a much lower number, about 37%, were being submitted without a legacy number as well.

Just days before the deadline, members of Medicare's Practicing Physicians Advisory Council voiced their own concerns and tribulations in working toward compliance with the NPI requirements.

"The potential of claims not being paid looms large," said Dr. Arthur Snow, a PPAC member and family physician from Shawnee Mission, Kans.

Previous deadlines, such as the March 1 requirement to use an NPI for all primary provider fields, have already created payment backlogs, said several PPAC members, who complained their staffs have spent hours digging up NPI numbers manually because their software has not been updated to meet the new requirements.

"We went through about 2 months of rejections and the same situation you heard about before where our cash flow went down to zilch. It's been a major, major headache in our office and they're still trying to get those numbers," said PPAC member Dr. Jeffrey Ross, a physician and podiatrist from Houston.

The physicians made several recommendations to CMS staff, such as delaying the move to NPI-only or, at the very least, closely monitoring implementation for potential problems.

The American Medical Association, the Medical Group Management Association, and the American Hospital Association delivered a similar message a couple of days later in a letter to Health and Human Services Secretary Mike Leavitt.

"Although we and our members have worked diligently and invested significant time and resources to comply with the NPI deadline, the health care industry is not well served by terminating the 1 year NPI contingency time frame at this time. Doing so will only make what has been a complex undertaking, an exceedingly disruptive transition," the groups wrote.

The letter cites an analysis by Emdeon Business Services, the nation's largest medical claims clearinghouse, suggesting that as of the end of April, 10% of claims were being submitted without an NPI and close to 70% were carrying a legacy number for a secondary provider, potentially affecting billions of dollars' worth of claims.

Although it is still too early to know whether the NPI-only policy will lead to delays in reimbursement, there have been few complaints to Medicare so far, according to a Medicare official.

Preliminary trends suggest that most of the claims being rejected for having legacy identifiers have the outdated numbers for secondary providers. Medicare has been advising physicians to either contact secondary providers for their NPI numbers or to get them off the Web-based registry for the identifiers.

Reference: 1. Weinzimer SA, Ternand C, Howard C, Chang C-T, Becker DJ, Laffel LMB, for the Insulin Aspart Pediatric Pump Study Group. A randomized trial comparing continuous subcutaneous insulin infusion of insulin aspart versus insulin lispro in children and adolescents with type 1 diabetes. *Diabetes Care*. 2008;31(2):210-215.

NovoLog® (insulin aspart [rDNA origin] injection)

Rx only

BRIEF SUMMARY. Please consult package insert for full prescribing information.

INDICATIONS AND USAGE: NovoLog® is an insulin analog indicated to improve glycemic control in adults and children with diabetes mellitus.

CONTRAINDICATIONS: NovoLog® is contraindicated during episodes of hypoglycemia and in patients hypersensitive to NovoLog® or one of its excipients.

WARNINGS AND PRECAUTIONS: Administration: NovoLog® has a more rapid onset of action and a shorter duration of activity than regular human insulin. An injection of NovoLog® should immediately be followed by a meal within 5-10 minutes. Because of NovoLog®'s short duration of action, a longer acting insulin should also be used in patients with type 1 diabetes and may also be needed in patients with type 2 diabetes. Glucose monitoring is recommended for all patients with diabetes and is particularly important for patients using external pump infusion therapy. Any change of insulin dose should be made cautiously and only under medical supervision. Changing from one insulin product to another or changing the insulin strength may result in the need for a change in dosage. As with all insulin preparations, the time course of NovoLog® action may vary in different individuals or at different times in the same individual and is dependent on many conditions, including the site of injection, local blood supply, temperature, and physical activity. Patients who change their level of physical activity or meal plan may require adjustment of insulin dosages. Insulin requirements may be altered during illness, emotional disturbances, or other stresses. Patients using continuous subcutaneous insulin infusion pump therapy must be trained to administer insulin by injection and have alternate insulin therapy available in case of pump failure. **Hypoglycemia:** Hypoglycemia is the most common adverse effect of all insulin therapies, including NovoLog®. Severe hypoglycemia may lead to unconsciousness and/or convulsions and may result in temporary or permanent impairment of brain function or death. Severe hypoglycemia requiring the assistance of another person and/or parenteral glucose infusion or glucagon administration has been observed in clinical trials with insulin, including trials with NovoLog®. The timing of hypoglycemia usually reflects the time-action profile of the administered insulin formulations [see *Clinical Pharmacology*]. Other factors such as changes in food intake (e.g., amount of food or timing of meals), injection site, exercise, and concomitant medications may also alter the risk of hypoglycemia [see *Drug Interactions*]. As with all insulins, use caution in patients with hypoglycemia unawareness and in patients who may be predisposed to hypoglycemia (e.g., patients who are fasting or have erratic food intake). The patient's ability to concentrate and react may be impaired as a result of hypoglycemia. This may present a risk in situations where these abilities are especially important, such as driving or operating other machinery. Rapid changes in serum glucose levels may induce symptoms of hypoglycemia in persons with diabetes, regardless of the glucose value. Early warning symptoms of hypoglycemia may be different or less pronounced under certain conditions, such as longstanding diabetes, diabetic nerve disease, use of medications such as beta-blockers, or intensified diabetes control [see *Drug Interactions*]. These situations may result in severe hypoglycemia (and, possibly, loss of consciousness) prior to the patient's awareness of hypoglycemia. Intravenously administered insulin has a more rapid onset of action than subcutaneously administered insulin, requiring more close monitoring for hypoglycemia. **Hypokalemia:** All insulin products, including NovoLog®, cause a shift in potassium from the extracellular to intracellular space, possibly leading to hypokalemia that, if left untreated, may cause respiratory paralysis, ventricular arrhythmia, and death. Use caution in patients who may be at risk for hypokalemia (e.g., patients using potassium-lowering medications, patients taking medications sensitive to serum potassium concentrations, and patients receiving intravenously administered insulin). **Renal Impairment:** As with other insulins, the dose requirements for NovoLog® may be reduced in patients with renal impairment [see *Clinical Pharmacology*]. **Hepatic Impairment:** As with other insulins, the dose requirements for NovoLog® may be reduced in patients with hepatic impairment [see *Clinical Pharmacology*]. **Hypersensitivity and Allergic Reactions: Local Reactions:** As with other insulin therapy, patients may experience redness, swelling, or itching at the site of NovoLog® injection. These reactions usually resolve in a few days to a few weeks, but in some occasions, may require discontinuation of NovoLog®. In some instances, these reactions may be related to factors other than insulin, such as irritants in a skin cleansing agent or poor injection technique. Localized reactions and generalized myalgias have been reported with injected metacresol, which is an excipient in NovoLog®. **Systemic Reactions:** Severe, life-threatening, generalized allergy, including anaphylaxis, may occur with any insulin product, including NovoLog®. Anaphylactic reactions with NovoLog® have been reported post-approval. Generalized allergy to insulin may also cause whole body rash (including pruritus), dyspnea, wheezing, hypotension, tachycardia, or diaphoresis. In controlled clinical trials, allergic reactions were reported in 3 of 735 patients (0.4%) treated with regular human insulin and 10 of 1394 patients (0.7%) treated with NovoLog®. In controlled and uncontrolled clinical trials, 3 of 2341 (0.1%) NovoLog®-treated patients discontinued due to allergic reactions. **Antibody Production:** Increases in anti-insulin antibody titers that react with both human insulin and insulin aspart have been observed in patients treated with NovoLog®. Increases in anti-insulin antibodies are observed more frequently with NovoLog® than with regular human insulin. Data from a 12-month controlled trial in patients with type 1 diabetes suggest that the increase in these antibodies is transient, and the differences in antibody levels between the regular human insulin and insulin aspart treatment groups observed at 3 and 6 months were no longer evident at 12 months. The clinical significance of these antibodies is not known. These antibodies do not appear to cause deterioration in glycemic control or necessitate increases in insulin dose. **Mixing of Insulins:** Mixing NovoLog® with NPH human insulin, NovoLog® should be drawn into the syringe first, and the mixture should be injected immediately after mixing. The efficacy and safety of mixing NovoLog® with insulin preparations produced by other manufacturers have not been studied. Insulin mixtures should not be administered intravenously. **Subcutaneous continuous insulin infusion by external pump: When used in an external subcutaneous insulin infusion pump, NovoLog® should not be mixed with any other insulin or diluent.** When using NovoLog® in an external insulin pump, the NovoLog®-specific information should be followed (e.g., in-use time, frequency of changing infusion sets) because NovoLog®-specific information may differ from general pump manual instructions. Pump or infusion set malfunctions or insulin degradation can lead to a rapid onset of hyperglycemia and ketosis because of the small subcutaneous depot of insulin. This is especially pertinent for rapid-acting insulin analogs that are more rapidly absorbed through skin and have a shorter duration of action. Prompt identification and correction of the cause of hyperglycemia or ketosis is necessary. Interim therapy with subcutaneous injection may be required [see *Dosage and Administration, Warnings and Precautions, How Supplied/Storage and Handling, and Patient Counseling Information*]. NovoLog® is recommended for use in pump systems suitable for insulin infusion as listed below. **Pumps:** MiniMed 500 series and other equivalent pumps. **Reservoirs and infusion sets:** NovoLog® is recommended for use in reservoir and infusion sets that are compatible with insulin and the specific pump. In-vitro studies have shown that pump malfunction, loss of metacresol, and insulin degradation, may occur when NovoLog® is maintained in a

pump system for longer than 48 hours. Reservoirs and infusion sets should be changed at least every 48 hours. NovoLog® should not be exposed to temperatures greater than 37°C (98.6°F). **NovoLog® that will be used in a pump should not be mixed with other insulin or with a diluent** [see *Dosage and Administration, Warnings and Precautions and How Supplied/Storage and Handling, Patient Counseling Information*].

ADVERSE REACTIONS: Clinical Trial Experience: Because clinical trials are conducted under widely varying designs, the adverse reaction rates reported in one clinical trial may not be easily compared to those rates reported in another clinical trial, and may not reflect the rates actually observed in clinical practice. **Hypoglycemia:** Hypoglycemia is the most commonly observed adverse reaction in patients using insulin, including NovoLog® [see *Warnings and Precautions*]. **Insulin initiation and glucose control intensification:** Intensification or rapid improvement in glucose control has been associated with a transitory, reversible ophthalmologic refraction disorder, worsening of diabetic retinopathy, and acute painful peripheral neuropathy. However, long-term glycemic control decreases the risk of diabetic retinopathy and neuropathy. **Lipodystrophy:** Long-term use of insulin, including NovoLog®, can cause lipodystrophy at the site of repeated insulin injections or infusion. Lipodystrophy includes lipohypertrophy (thickening of adipose tissue) and lipoatrophy (thinning of adipose tissue), and may affect insulin absorption. Rotate insulin injection or infusion sites within the same region to reduce the risk of lipodystrophy. **Weight gain:** Weight gain can occur with some insulin therapies, including NovoLog®, and has been attributed to the anabolic effects of insulin and the decrease in glucosuria. **Peripheral Edema:** Insulin may cause sodium retention and edema, particularly if previously poor metabolic control is improved by intensified insulin therapy. **Frequencies of adverse drug reactions:** The frequencies of adverse drug reactions during NovoLog® clinical trials in patients with type 1 diabetes mellitus and type 2 diabetes mellitus are listed in the tables below.

Table 1: Treatment-Emergent Adverse Events in Patients with Type 1 Diabetes Mellitus (Adverse events with frequency ≥ 5% and occurring more frequently with NovoLog® compared to human regular insulin are listed)

Preferred Term	NovoLog® + NPH N= 596		Human Regular Insulin + NPH N= 286	
	N	(%)	N	(%)
Hypoglycemia*	448	75%	205	72%
Headache	70	12%	28	10%
Injury accidental	65	11%	29	10%
Nausea	43	7%	13	5%
Diarrhea	28	5%	9	3%

*Hypoglycemia is defined as an episode of blood glucose concentration <45 mg/dL with or without symptoms. See *Clinical Studies* for the incidence of serious hypoglycemia in the individual clinical trials.

Table 2: Treatment-Emergent Adverse Events in Patients with Type 2 Diabetes Mellitus (except for hypoglycemia, adverse events with frequency ≥ 5% and occurring more frequently with NovoLog® compared to human regular insulin are listed)

	NovoLog® + NPH N= 91		Human Regular Insulin + NPH N= 91	
	N	(%)	N	(%)
Hypoglycemia*	25	27%	33	36%
Hyporeflexia	10	11%	6	7%
Onychomycosis	9	10%	5	5%
Sensory disturbance	8	9%	6	7%
Urinary tract infection	7	8%	6	7%
Chest pain	5	5%	3	3%
Headache	5	5%	3	3%
Skin disorder	5	5%	2	2%
Abdominal pain	5	5%	1	1%
Sinusitis	5	5%	1	1%

*Hypoglycemia is defined as an episode of blood glucose concentration <45 mg/dL, with or without symptoms. See *Clinical Studies* for the incidence of serious hypoglycemia in the individual clinical trials.

Postmarketing Data: The following additional adverse reactions have been identified during postapproval use of NovoLog®. Because these adverse reactions are reported voluntarily from a population of uncertain size, it is generally not possible to reliably estimate their frequency. Medication errors in which other insulins have been accidentally substituted for NovoLog® have been identified during postapproval use [see *Patient Counseling Information*].

OVERDOSAGE: Excess insulin administration may cause hypoglycemia and, particularly when given intravenously, hypokalemia. Mild episodes of hypoglycemia usually can be treated with oral glucose. Adjustments in drug dosage, meal patterns, or exercise, may be needed. More severe episodes with coma, seizure, or neurologic impairment may be treated with intramuscular/subcutaneous glucagon or concentrated intravenous glucose. Sustained carbohydrate intake and observation may be necessary because hypoglycemia may recur after apparent clinical recovery. Hypokalemia must be corrected appropriately.

More detailed information is available on request.

Date of Issue: March 14, 2008

Version 14

Manufactured by Novo Nordisk A/S, DK-2880 Bagsvaerd, Denmark

Manufactured for Novo Nordisk Inc., Princeton, New Jersey 08540
www.novonordisk-us.com

NovoLog® is a registered trademark of Novo Nordisk A/S.

NovoLog® is covered by US Patent Nos 5,618,913; 5,866,538; and other patents pending.

© 2008 Novo Nordisk Inc. 134600 4/08



NovoLog®
insulin aspart (rDNA origin) injection

INDEX OF ADVERTISERS

Allergan, Inc.	
Lap-Band	18-19
Abbott Laboratories	
TriLipix	4a-4b
TriCor	29-30
Bayer HealthCare LLC	
Contour	33
Depomed, Inc.	
Glumetza	24-26
Disetronic Medical Systems Inc.	
ACCU-CHEK	12a-12b, 13
GlaxoSmithKline	
Avandia	8a-8f
Tums	11
Eli Lilly & Company	
Humalog	6-8,
Humalog Mix 75 / 25 KwikPen	20-22
Merck & Co., Inc.	
Janumet	16a-16b, 17
Novo Nordisk Inc.	
NovoLog	35-36
sanofi-aventis U.S. LLC	
Lantus SoloStar	3-4
Takeda Pharmaceuticals America, Inc.	
Actos	39-40