

CMS Revises Power Wheelchair Payment Rules

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WASHINGTON — The Centers for Medicare and Medicaid Services has revised its rules for reimbursement for power wheelchairs and scooters.

“This interim final rule is a critical step in ensuring that people with Medicare have access to appropriate technology to assist them with mobility,” CMS Administrator Mark McClellan, M.D., said in a statement. The rule “is part of a comprehensive strategy to help Medicare beneficiaries get the mobility assistance equipment they need while avoiding unnecessary administrative burdens and inappropriate Medicare spending.”

Physicians and other providers criticized the old reimbursement criteria as too burdensome, since they required physicians to provide a certificate of medical necessity before the wheelchair could be covered. But CMS officials were wary of loosening coverage requirements because of a rash of fraudulent wheelchair and scooter claims. The fraud reached such a high level that CMS launched its “Operator Wheeler Dealer” campaign to stop it.

Under the new regulations, the medical necessity certificate has been eliminated, but in its place, the agency is requiring certain clinical documentation items from the patient’s medical record, along with a written prescription—given within 30 days of the evaluation—issued to the supplier. And the rules keep the requirement that physicians must conduct a face-to-face examination of the patient before prescribing a mobility device.

Medicare already pays for this evaluation visit. However, because of the additional documentation required under the new rules, CMS is authorizing an additional payment to physicians for preparing the paperwork. Physicians must include a special billing code on the office visit claim in order to receive this extra payment.

The agency also is removing the requirement that only certain specialists—physiatrists, orthopedic surgeons, neurologists, and rheumatologists—to prescribe power scooters. Instead, all physicians and treating practitioners will be able to prescribe scooters and power wheelchairs.

The Power Mobility Coalition (PMC), a group of mobility-device manufacturers,

expressed concern that the new rules would make it tougher for physicians to comply.

“The PMC agrees with CMS that the treating physician is in the best position to assess the need for power mobility devices, but is concerned that, in order to fully succeed, CMS and its contractors will have to conduct a comprehensive review of the benefit for physicians,” the organization said in a statement. “Physicians may not be fully aware of the analytical standard

that will be applied to claims, let alone which of the 49 new product codes most appropriately meets beneficiary needs.

“The PMC also has concerns over the 30-day time frame for submission of a [mobility device] claim after a physician face-to-face visit,” the statement continued. “Given the extensive documentation requirement, suppliers, especially those in rural areas, may find the 30-day time frame too tight to obtain and submit all relevant parts of the medical record, as

well as the necessary supporting documentation.”

The new rules, which were published in the Aug. 26 Federal Register, will take effect Oct. 25. CMS will accept comments on the rules until Nov. 25, and a final rule will be published “at a later date,” according to the agency.

The interim final rule and accompanying fact sheet can be found online at www.cms.hhs.gov/coverage/wheelchairs.asp.

*Evidence of Interferon Dose-response: European North American Comparative Efficacy study.
 †Prevention of Relapses and Disability by Interferon β-1a Subcutaneously in Multiple Sclerosis study.
 References: 1. Data on file, Serono, Inc. 2. The PRISMS Study Group, and the University of British Columbia MS/MRI Analysis Group. PRISMS-4: long-term efficacy of interferon-β-1a in relapsing MS. *Neurology*. 2001;56:1628-1636.



BRIEF SUMMARY OF FULL PRESCRIBING INFORMATION

INDICATIONS AND USAGE

Rebif® (interferon-beta-1a) is indicated for the treatment of patients with relapsing forms of multiple sclerosis to decrease the frequency of clinical exacerbations and delay the accumulation of physical disability. Efficacy of Rebif® in chronic progressive multiple sclerosis has not been established.

Clinical Studies

Two multicenter studies evaluated the safety and efficacy of Rebif® in patients with relapsing-remitting multiple sclerosis. Study 1 demonstrated that Rebif® significantly reduced the number of relapses per patient compared to placebo at 2 years. Study 2 was a comparative trial comparing Rebif® 44 mcg sc tiw and Avonex® 30 mcg im qw. The results of this trial demonstrated that patients treated with Rebif® 44 mcg sc tiw were more likely to remain relapse-free at 24 and 48 weeks than were patients treated with Avonex® 30 mcg im qw. Adverse reactions over 48 weeks were generally similar between the two treatment groups. Exceptions included injection site disorders (83% of patients on Rebif® vs. 28% of patients on Avonex®), hepatic function disorders (18% on Rebif® vs. 10% on Avonex®), and leukopenia (6% on Rebif® vs. <1% on Avonex®), which were observed with greater frequency in the Rebif® group compared to the Avonex® group.

CONTRAINDICATIONS

Rebif® (interferon beta-1a) is contraindicated in patients with a history of hypersensitivity to natural or recombinant interferon, human albumin, mannitol USP, sodium acetate, or Water for Injection USP.

WARNINGS

Rebif® (interferon beta-1a) should be used with caution in patients with depression, a condition that is common in people with multiple sclerosis. Depression, suicidal ideation, and suicide attempts have been reported to occur with increased frequency in patients receiving interferon compounds, including Rebif®. Patients should be advised to report immediately any symptoms of depression and/or suicidal ideation to the prescribing physician. If a patient develops depression, cessation of treatment with Rebif® should be considered.

Severe liver injury, including some cases of hepatic failure requiring liver transplantation has been reported rarely in patients taking Rebif®. Symptoms of liver dysfunction began from one to six months following the initiation of Rebif®. If jaundice or other symptoms of liver dysfunction appear, treatment with Rebif® should be discontinued immediately due to the potential for rapid progression to liver failure. Asymptomatic elevation of hepatic transaminases (particularly SGPT) is common with interferon therapy (see ADVERSE REACTIONS). Rebif® should be initiated with caution in patients with active liver disease, alcohol abuse, increased serum SGPT (>2.5 times ULN), or a history of significant liver disease. Also, the potential risk of Rebif® used in combination with known hepatotoxic products should be considered prior to Rebif® administration, or when adding new agents to the regimen of patients already on Rebif®. Reduction of Rebif® dose should be considered if SGPT rises above 5 times the upper limit of normal. The dose may be gradually re-escalated when enzyme levels have normalized.

Anaphylaxis has been reported as a rare complication of Rebif® use. Other allergic reactions have included skin rash and urticaria, and have ranged from mild to severe without a clear relationship to dose or duration of exposure. Several allergic reactions, some severe, have occurred after prolonged use.

PRECAUTIONS

General: Caution should be exercised when administering Rebif® to patients with pre-existing seizure disorders. Seizures have been associated with the use of beta interferons. A relationship between occurrence of seizures and the use of Rebif® has not been established. Leukopenia and new or worsening thyroid abnormalities have developed in some patients treated with Rebif®. Regular monitoring for these conditions is recommended.

Information for Patients

All patients should be instructed to read the Rebif® Medication Guide supplied to them. Patients should be cautioned not to change the dosage or the schedule of administration without medical consultation.

Patients should be informed of the most common and the most severe adverse reactions associated with the use of Rebif®. Patients should be advised of the symptoms associated with these conditions, and to report them to their physician.

Female patients should be cautioned about the abortifacient potential of Rebif®.

Patients should be instructed in the use of aseptic technique when administering Rebif®. Appropriate instruction for self-injection or injection by another person should be provided, including careful review of the Rebif® Medication Guide. If a patient is to self-administer Rebif®, the physical and cognitive ability of that patient to self-administer and properly dispose of syringes should be assessed. The initial injection should be performed under the supervision of an appropriately qualified health care professional. Patients should be advised of the importance of rotating sites of injection with each dose, to minimize the likelihood of severe injection site reactions or necrosis.

Laboratory Tests: In addition to those laboratory tests normally required for monitoring patients with multiple sclerosis, blood cell counts and liver function tests are recommended at regular intervals (1, 3, and 6 months) following introduction of Rebif® therapy and then periodically thereafter in the absence of clinical symptoms. Thyroid function tests are recommended every 6 months in patients with a history of thyroid dysfunction or as clinically indicated. Patients with myelosuppression may require more intensive monitoring of complete blood cell counts, with differential and platelet counts.

Drug Interactions: Drug interaction studies have not been conducted with Rebif®. Due to its potential to cause neutropenia and lymphopenia, proper monitoring of patients is required if Rebif® is given in combination with myelosuppressive agents.

Also, the potential for hepatic injury should be considered when Rebif® is used in combination with other products associated with hepatic injury, or when new agents are added to the regimen of patients already on Rebif® (see WARNINGS).

Carcinogenesis, Mutagenesis, Impairment of Fertility: No carcinogenicity data for Rebif® are available in animals or humans. Rebif® was not mutagenic when tested in the Ames bacterial test and in an *in vitro* cytogenetic assay in human lymphocytes in the presence and absence of metabolic activation. No studies have been conducted to evaluate the effects of Rebif® on fertility in humans. In studies in normally cycling female cynomolgus monkeys given daily sc injections of Rebif® for six months at doses of up to 9 times the recommended weekly human dose (based on body surface area), no effects were observed on either menstrual cycling or serum estradiol levels. The validity of extrapolating doses used in animal studies to human doses is not established. In male monkeys, the same doses of Rebif® had no demonstrable adverse effects on sperm count, motility, morphology, or function.

Pregnancy Category C: Rebif® treatment has been associated with significant increases in embryolethal or abortifacient effects in cynomolgus monkeys administered doses approximately 2 times the cumulative weekly human dose (based on either body weight or surface area) either during the period of organogenesis (gestation day 21-89) or later in pregnancy. There were no fetal malformations or other evidence of teratogenesis noted in these studies. These effects are consistent with the abortifacient effects of other type I interferons. There are no adequate and well-controlled studies of

Rebif® in pregnant women. However, in Studies 1 and 2, there were 2 spontaneous abortions observed and 5 fetuses carried to term among 7 women in the Rebif® groups. If a woman becomes pregnant or plans to become pregnant while taking Rebif®, she should be informed about the potential hazards to the fetus and discontinuation of Rebif® should be considered. A pregnancy registry has been established to monitor pregnancy outcomes of women exposed to Rebif® while pregnant. Register patients online at www.RebifPregnancyRegistry.com or call MS LifeLines™ at 1-877-447-3243.

Nursing Mothers: It is not known whether Rebif® is excreted in human milk.

Pediatric Use: The safety and effectiveness of Rebif® in pediatric patients have not been studied.

Geriatric Use: Clinical studies of Rebif® did not include sufficient numbers of subjects aged 65 and over to determine whether they respond differently than younger subjects.

ADVERSE REACTIONS

The most frequently reported serious adverse reactions with Rebif® were psychiatric disorders including depression and suicidal ideation or attempt (see WARNINGS). The incidence of depression of any severity in the Rebif®-treated groups and placebo-treated group was approximately 25%. In post-marketing experience, Rebif® administration has been rarely associated with severe liver dysfunction, including hepatic failure requiring liver transplantation (see WARNINGS). The most commonly reported adverse reactions were injection site disorders, influenza-like symptoms (headache, fatigue, fever, rigors, chest pain, back pain, myalgia), abdominal pain, depression, elevation of liver enzymes and hematologic abnormalities. The most frequently reported adverse reactions resulting in clinical intervention (e.g., discontinuation of Rebif®, adjustment in dosage, or the need for concomitant medication to treat an adverse reaction symptom) were injection site disorders, influenza-like symptoms, depression and elevation of liver enzymes (see WARNINGS). Injection site necrosis was rare.

Table 1. Adverse Reactions and Laboratory Abnormalities in Study 1

BODY SYSTEM Preferred Term	Placebo tiw (n=187)	Rebif® 22 mcg tiw (n=189)	Rebif® 44 mcg tiw (n=184)
BODY AS A WHOLE			
Influenza-like symptoms	51%	56%	59%
Headache	63%	65%	70%
Fatigue	36%	33%	41%
Fever	16%	25%	28%
Rigors	5%	6%	13%
Chest Pain	5%	6%	8%
Malaise	1%	4%	5%
INJECTION SITE DISORDERS			
Injection Site Reaction	39%	89%	92%
Injection Site Necrosis	0%	1%	3%
CENTRAL & PERIPHERAL NERVOUS SYSTEM DISORDERS			
Hypertonia	5%	7%	6%
Coordination Abnormal	2%	5%	4%
Convulsions	2%	5%	4%
ENDOCRINE DISORDERS			
Thyroid Disorder	3%	4%	6%
GASTROINTESTINAL SYSTEM DISORDERS			
Abdominal Pain	17%	22%	20%
Dry Mouth	1%	1%	5%
LIVER AND BILIARY SYSTEM DISORDERS			
SGPT Increased	4%	20%	27%
SGOT Increased	4%	10%	17%
Hepatic Function Abnormal	2%	4%	9%
Bilirubinaemia	1%	3%	2%
MUSCULO-SKELETAL SYSTEM DISORDERS			
Myalgia	20%	25%	25%
Back Pain	20%	23%	25%
Skeletal Pain	10%	15%	10%
HEMATOLOGIC DISORDERS			
Leukopenia	14%	28%	36%
Lymphadenopathy	8%	11%	12%
Thrombocytopenia	2%	2%	8%
Anemia	3%	3%	5%
PSYCHIATRIC DISORDERS			
Somnolence	1%	4%	5%
SKIN DISORDERS			
Rash Erythematous	3%	7%	5%
Rash Maculo-Papular	2%	5%	4%
URINARY SYSTEM DISORDERS			
Micturition Frequency	4%	2%	7%
Urinary Incontinence	2%	4%	2%
VISION DISORDERS			
Vision Abnormal	7%	7%	13%
Xerophthalmia	0%	3%	1%

The safety of Rebif® (22 mcg and 44 mcg) vs placebo was studied in 560 patients with RMS who were treated for 24 months (Study 1). Table 1 enumerates adverse events and laboratory abnormalities that occurred at an incidence that was at least 2% more in either Rebif®-treated group than was observed in the placebo group.

Immunogenicity: As with all therapeutic proteins, there is a potential for immunogenicity. Serum NAB were detected in 31% and 24% of Rebif®-treated patients at the 22 mcg and 44 mcg tiw dose respectively at one or more times during Study 1. The clinical significance of the presence of NAB to Rebif® is unknown. Comparison of the incidence of antibodies to other products may be misleading.

DOSAGE AND ADMINISTRATION
 Dosages of Rebif® shown to be safe and effective are 22 mcg and 44 mcg sc tiw. Rebif® should be administered, if possible, at the same time (preferably in the late afternoon or evening) on the same three days (e.g. Monday, Wednesday, and Friday) at least 48 hours apart each week. Generally, patients should be started at 20% of the prescribed dose and increased over a 4-week period to the targeted dose, either 22 mcg or 44 mcg sc tiw. Leukopenia or elevated liver function tests may necessitate dose reduction or discontinuation of Rebif® administration until toxicity is resolved.

Rebif® is intended for use under the guidance and supervision of a physician. It is recommended that physicians or qualified medical personnel train patients in the proper technique for self-administering subcutaneous injections using the pre-filled syringe. Patients should be advised to rotate sites for sc injections. Concurrent use of analgesics and/or antipyretics may help ameliorate flu-like symptoms on treatment days. Rebif® should be inspected visually for particulate matter and discoloration prior to administration.

Rx only.

Manufacturer: Serono, Inc., Rockland, MA 02370
 U.S. License # 1574

Co-marketed by: Serono, Inc., Rockland, MA 02370
 Pfizer, Inc., New York, NY 10017

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