

CSRO

CELEBRATING 20 YEARS

CSRO Advocacy Update

PRESENTER
Brian Henderson

Presentation Overview

- About CSRO
- Federal Activity
- State Activity
- Resources for You
- Questions

Federal Activity

Access to Medications

Safe Step Act (S.652/H.R.2630)

- To reform step therapy in ERISA plans
- Significant momentum: reported out of Senate HELP Committee as part of PBM reform legislation; has received discussion at House markups

Improving Seniors' Timely Access to Care Act (H.R. 3173)

- To reform prior authorization in Medicare Advantage (MA)
- Passed the House Sept. 2022; stalled in the Senate due to unfavorable CBO score
- Sponsors are working with CMS to determine whether some of the changes can be accomplished via regulation
- Included in Ways & Means Committee markup of transparency legislation (H.R.4822) in July 2023

HELP Copays Act (H.R.830/S.1375)

- To prohibit the use of copay accumulators in Affordable Care Act exchanges
- 67 cosponsors in the House; 14 in the Senate

Pharmacy Benefit Manager (PBM) Reform

Federal PBM reform bills fall into five major categories:

1. Transparency: Generally it seems that transparency is now considered a necessary foundation for other reforms, but not sufficient in and of itself.
2. Pharmacy-facing reforms (i.e., prohibitions/limitations on spread pricing and patient steering)
3. Delinking drug list prices from PBM income.
4. Mandating pass-through of price concessions.
5. Improving patient access (i.e., utilization management, copay assistance, etc.)

PBM Reform (continued)

There are many PBM-related bills, but the most comprehensive bills are the following:

- ***Pharmacy Benefit Manager Reform Act (S.1339)***
 - Status: Reported out of the HELP Committee.
- ***Modernizing and Ensuring PBM Accountability Act***
 - Status: Reported out of the Senate Finance Committee on July 26.
 - Committee will have at least one more markup in the fall to consider additional provisions.
- ***Protecting Patients Against PBM Abuses Act (H.R.2880)***
 - Status: Referred to Committees of jurisdiction, but no markup yet.

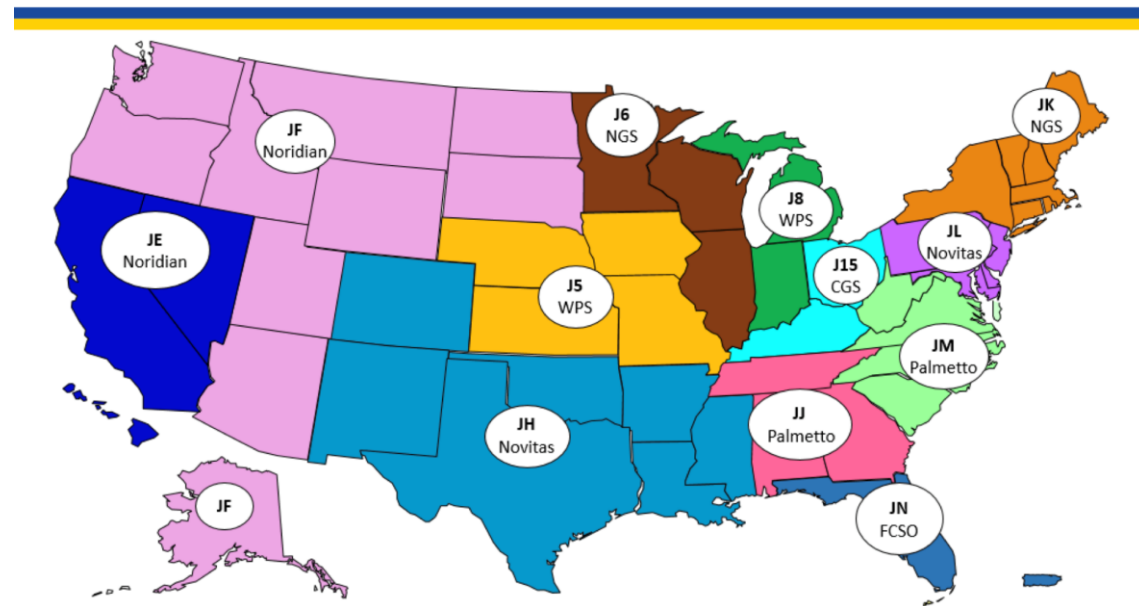
Key Provisions in Current Versions of Major PBM Reform Bills

	Transparency	Spread pricing prohibition/limitation	Delinking	Pass-through	Patient access
<i>Pharmacy Benefit Manager Reform Act (S.1339)</i>	✓	✓	✗	✓ <i>Pass-through accrues to payers.</i>	✓ <i>Includes Safe Step Act</i>
<i>Modernizing and Ensuring PBM Accountability Act</i>	✓	✓	✓	✗ <i>Cte. working to include.</i>	✗
<i>Protecting Patients Against PBM Abuses Act (H.R.2880)</i>	✓	✓	✓	✗	✗

Local Coverage and Payment Policy

- CSRO addressing Medicare Administrative Contractor (MAC) policies creating challenges for rheumatology practices
 - Complex drug administration “down coding”
 - Self-Administered Drug (SAD) List
- Key Challenges in Local Coverage:
 - Limited clinician engagement
 - Misinterpretation of 21st Century Cures requirements
 - SAD List: Discriminatory?
- CMS has issued an RFI seeking input on the aforementioned issues as part of the CY 2024 MPFS

A/B MAC Jurisdictions
as of June 2021



Michigan Activity

Accumulator Adjustment Programs

- HB 4719
- Status: Referred to Committee on Insurance and Financial Services
- Provisions:
 - Health plans must count copay assistance towards patient cost-sharing requirements
 - Partial carveout for HSA eligible HDHPs
 - Alternative Funding programs are not addressed
 - Maximizer programs are not addressed

Step Therapy

- Provisions:
 - Providers can override a step therapy protocol under certain circumstances
 - Contraindicated or will likely cause harm
 - Expected to be ineffective
 - Tried and failed the drug or a similar drug
 - Best interest of the patient
 - Patient is stable
 - 24/72 hour response timeframes
 - Clinical review criteria used to set up a step therapy protocol must meet certain minimum standards
- How to get involved:
 - Sign up for CSRO Action Alerts
 - Check the CSRO Map Tool
 - Find and send us your stories

White Bagging

- Momentum on this issue is picking up!
 - ND & TX signed bills into law this year
- Provisions:
 - Generally prohibits plans from mandating use of white bagging
 - Plans cannot alter patient cost shares based on choice of provider
 - Plans cannot refuse to authorize based on choice of provider
 - Plans cannot reduce payment to a provider based on use of buy and bill

Resources & Opportunities for Involvement

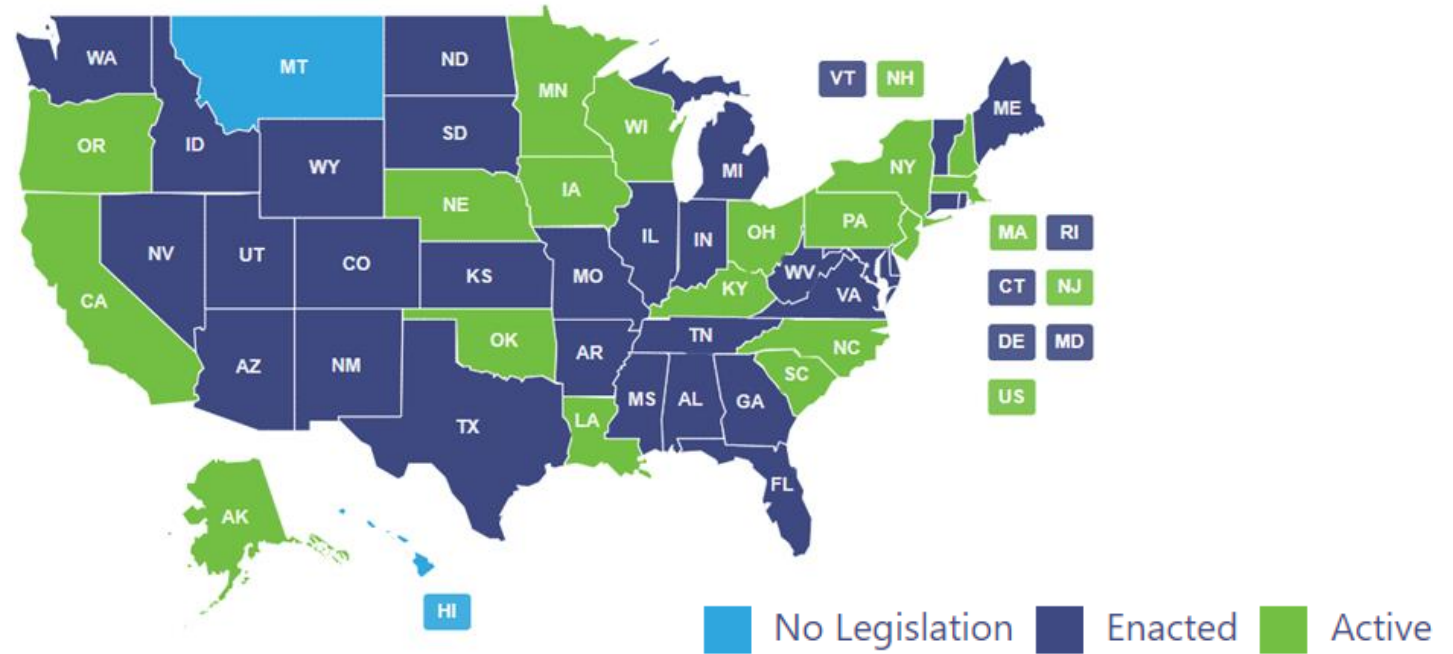
Resources for Member State Societies

- Grants to support state advocacy activities
 - Request up to \$5,000 to underwrite costs associated with educational webinars, visits to the state capitol, or other advocacy activities at the state level.
 - Learn more & apply: www.csro.info/membership/member-benefits/advocacy-grant
- Other member benefits include:
 - Invitations to meet with Congress
 - Travel stipend for representatives to attend the CSRO Advocacy Conference
 - Review all benefits at www.csro.info/membership/member-benefits

Legislative Map Tool



Find your state on our map tool to learn about current or proposed policy, and ways you can take action to make an impact: www.csro.info/map



Action Center



Use CSRO's online platform to easily communicate and engage directly with your elected officials:

www.csro.info/advocacy/action-center



NORTH CAROLINA - PRIOR AUTHORIZATION

Please consider personalizing your message — lawmakers are inundated with email in the virtual environment and personalized messages have a much greater chance of being seen directly by lawmakers. Letters that replace the provided template with an original message that...



MASSACHUSETTS - BIOMARKER TESTING

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MASSACHUSETTS - REBATE PASS THROUGH

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Sign Up for Alerts

Enter your information below to sign up.



Find Legislation

View and search for legislation.



Find Officials

☒ Elected Officials ☐ Candidates



Action Center – Find Officials

Use the “Find Officials” tool in CSRO’s Action Center and enter your zip code to view a list of your elected officials.

The screenshot displays the CSRO Action Center interface. On the left, there are three message templates for North Carolina and Massachusetts. In the center, a navigation menu includes 'Sign Up for Alerts', 'Find Legislation', and 'Find Officials' (which is circled in green). Below 'Find Officials' are radio buttons for 'Elected Officials' (selected) and 'Candidates', and a 'ZIP Code' input field. An arrow points from this field to the right-hand panel, titled 'Your State Officials'. This panel lists six West Virginia officials, each with a checkbox, a portrait, and their name and party affiliation.

Your State Officials	
<input type="checkbox"/>	Governor Jim Justice II (R-WV)
<input type="checkbox"/>	Secretary of State Mac Warner (R-WV)
<input type="checkbox"/>	Attorney General Patrick Morrisey (R-WV)
<input type="checkbox"/>	Senator Patrick Martin (R-WV-012)
<input type="checkbox"/>	Senator Ben Queen (R-WV-012)
<input type="checkbox"/>	Delegate Adam Burkhammer (R-WV-064)

Action Center – Find Legislation

Use the “Find Legislation” tool in CSRO’s Action Center to search for legislation your interested in using keywords.

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Sign Up for Alerts
Enter your information below to sign up.
Enter Email
ZIP Code

Find Legislation
View and search for legislation.
Enter Keywords

Find Officials
Elected Officials Candidates
ZIP Code

Find Legislation

West Virginia gold card Search

Displaying 5 of 5 bills matched (2023 Regular Session)

- [SB 267: Updating law regarding prior authorizations](#)
- [SB 259: Relating to regulation of pawnbrokers](#)
- [HB 2535: Relating to prior authorizations](#)
- [HB 2880: Relating to the Waiving of Certain DMV Fees for](#)
- [HB 2527: Relating to revising the criminal code generally.](#)

Advocacy Council



Apply to become more directly involved with CSRO and help amplify our advocacy efforts:

www.csro.info/membership/our-advocacy-council

A screenshot of the CSRO Advocacy Council Application form. The header features the CSRO logo (a stylized 'CSRO' with 'COMMITTEE OF STATE RHEUMATOLOGY ORGANIZATIONS' in smaller text below it) and the title 'Advocacy Council Application'. Below the header, there is a section titled 'Personal Information' with a list of required fields. The first field is '1. First and last name with credentials (i.e. MD, FACR, DO) *', followed by a text input box with the placeholder 'Enter your answer'.

Payer Issue Reporting Form



Request assistance with the payer relation issues impacting your patients or office:

www.csro.info/forms/insurance_notification.php

Description of the Issue *

Type of Payer/Health Plan ☐ Individual Commercial ☐ Group Coverage (Employer) ☐ Medicaid ☐ Military (Tri-Care) ☐ Medicare ☐ Uninsured ☐ Other

Please list the name, email and/or phone of a contact for the Payer/Health Plan, if known (or other contact, e.g. MAC)

Note: Before uploading a document of any kind, please ensure all individual health and contact information has been redacted.

If possible, upload a copy of the redacted insurance card.

Choose File

No file chosen

If possible, upload a copy of the redacted denial letter.

Choose File

No file chosen

If possible, upload a copy of the redacted policy change letter.

Choose File

No file chosen

All individual health and contact information **MUST be redacted** before uploading any document.

Additional Resources



Bi-Weekly Update: Receive CSRO's bi-weekly email with updates on relevant legislation and advocacy efforts, along with our current events and news. Review past emails & sign up!



Rheum for Action: Find your state on our map tool to learn about current or proposed policy and ways you can take action to make an impact. Read the latest editions now!



Policy Correspondence: Easily access all of CSRO's policy letters submitted to payers, state, and federal governments as an informational resource. Check out the correspondence today!

Upcoming CSRO Events

- Advocacy Conference & 20th Anniversary Celebration
 - August 25-27 – Austin, TX
- Business of Rheumatology: APPs and the Workforce
 - October 4, 2023 – Virtual seminar
- Fellows Conference
 - March 1-3, 2024 – Austin, TX
 - Free to attend, and travel stipend available for fellows and residents

Details available at: www.csro.info/conferences/upcoming-events

CSRO

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Questions?

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