

Effective Practices for Incorporating Immunotherapy into Hospital Operations

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Disclosures

- Travel and Consulting Fees: Mirati, Roche, Ariad, Abbvie, Lilly
- I will not be discussing non-FDA approved indications during my presentation.









Overview

- Administrator pearls of wisdom
 - Infrastructure, staffing, responsibilities
 - Role of multidisciplinary team in immunotherapy
- Replicable models
 - Emergency response to triage immunotherapy with immune related adverse events
- Pharmacy effective practices









I-O pipeline and research

- Current products on the market are the "tip of the iceberg" when looking at manufacturers' Immuno-Oncology (I-O) pipelines
- During the next one to five years, we can expect a new IO product or indication every few months
- Not only new products, but a myriad of new combinations and regimens
- Take advantage of pipeline reports published by various organizations









Strategies for new information

- Immuno-Oncology Champion
 - Identify an "Immuno-Oncology Champion" from among your providers to be the "I-O point person" responsible for all product questions and staff education (can be a physician, advance practice nurse or pharmacist)
- Education group
 - Identify a core group within your practice to manage patient education, including the review of existing patient materials and/or the development of new materials specific to I-O agents and management of their adverse effects
- Staff education
 - Proactively update staff on new information and consider use of manufacturer-provided resources including on-site training/education









Emergency Response

- I-O agents have an adverse event profile that differs from those associated with chemotherapy or commonly used biologic agents
- Staff charged with triaging patient phone calls need to be aware of potentially serious adverse events requiring immediate attention
 - Example: If patients go to ED or other setting, hospital clinicians need to be made aware of adverse events associated with I-O therapies
- Educating patients/staff and developing protocols for patient triage/management will help ensure that adverse events are quickly identified, managed, and mitigated







Emergency Response

Develop protocols

 Use your "I-O Champion" to take the lead in developing/revising any treatment protocols that may be impacted by the addition of new I-O therapies in your practice

Patient education

 Educate all patients on an I-O therapy to clearly identify themselves as such; make sure that these patients can be quickly identified as being on an I-O therapy in their medical record

Staff education

 Ensure staff understand and can identify the most common adverse events associated with I-O products, and know when these events could be potentially life-threatening and/or require immediate clinical attention









Manage reimbursement/finances

- New to market I-O agents may not yet have specific J-Code
 - Ensure process is in place for appropriate management/billing until J-Code is assigned or in the case of Hospital Outpatient Prospective Payment Services a C-Code (Temporary = C9399)
- Identify a point person from within your financial or reimbursement staff to focus on I-O agents and understand the nuances of the various patient support programs
 - Manufacturer replacement programs, co-pay support programs, co-pay foundations, and patient assistance programs
- Ensure your practice has sufficient Patient Advocate support
 - Most practices have found that Financial Counselors/Medication Assistance Coordinators pay for themselves many times over; if you are not sure if you have enough, it's a good time to conduct an analysis.









Develop approval process

- High dollar medication approval process
 - Full benefits investigation, utilize pharma services if offered and allowed per hospital/institution policy
 - Prioritize staff resources to enroll every viable patient into a support program, regardless of on or off-label
- Robust off-label policy and procedure
 - All off-label requests require predetermination
 - Patients are made aware of risks and benefits, including financial risk
 - Patients are required to sign an ABN or NONC
 - Peer review process for appeal if needed









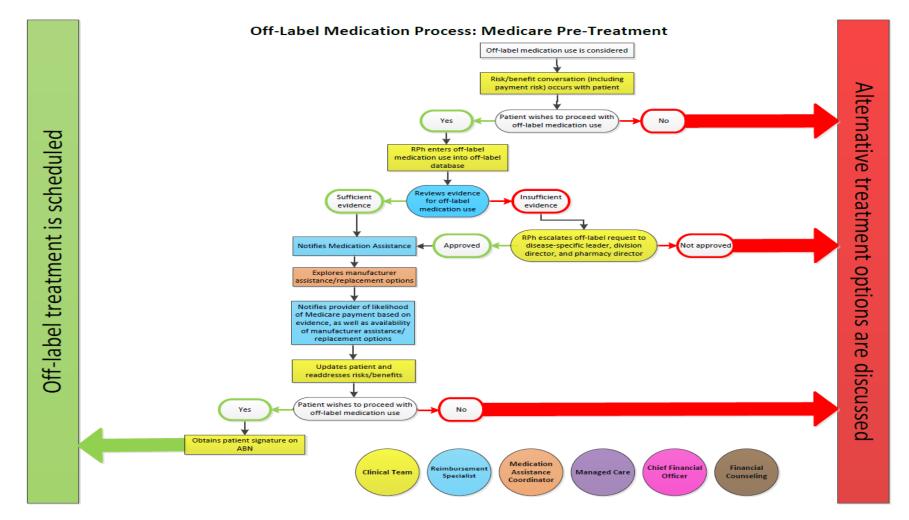
High Dollar Process Clinic nurse obtains Pharma form is Treatment signatures for Pharma scanned to Pharma form is submitted to includes high reimbursement form reimbursement company by RS dollar medication from patient and specialists (RS) prescriber On Label Request Off Label Request Full benefits Patient coverage investigation performed verified by RS Refer to Off label by Pharma services policy and and referral to copay procedure and PMAP resources Request submitted to provided if necessary payer for approval RS communicates with Patient scheduled for therapy pharmacist and team once Follow account to authorization is approved ensure payment and application of copav assistance Medication Assistance Program Coordinator MAPC assists with Coordinate with (MAPC) speaks with patient about benefits copay or PMAP business office to and need for copay or PMAP assistance submit copay grants assistance











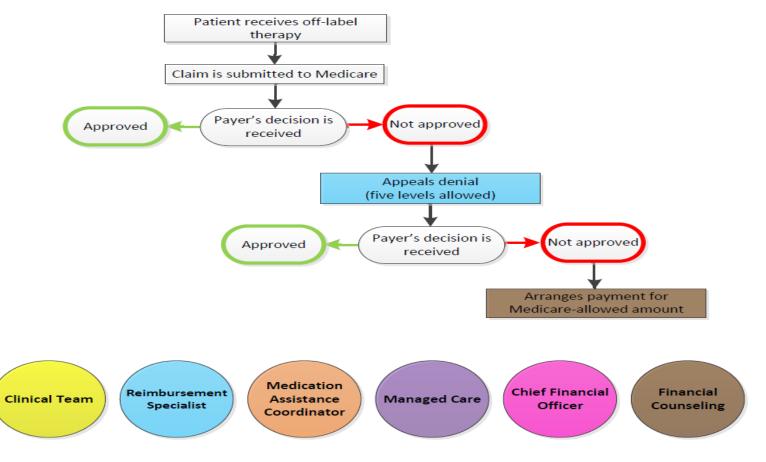








Off-Label Medication Process: Medicare Post-Treatment

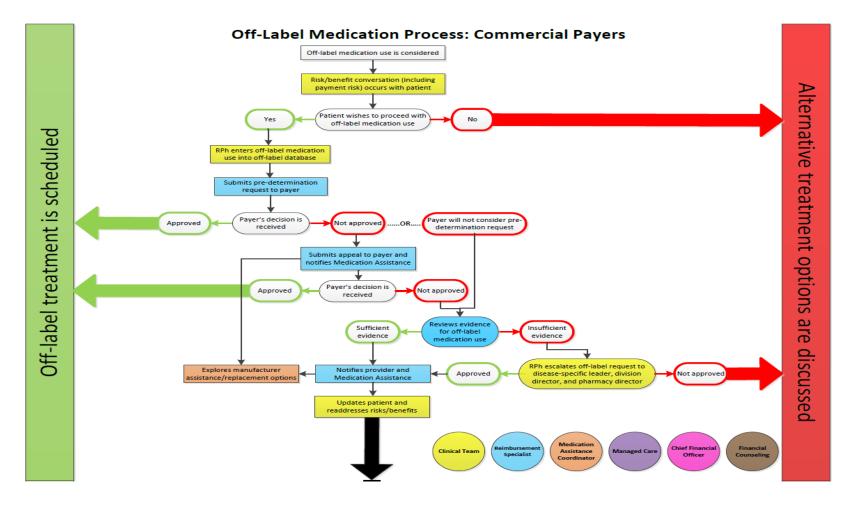










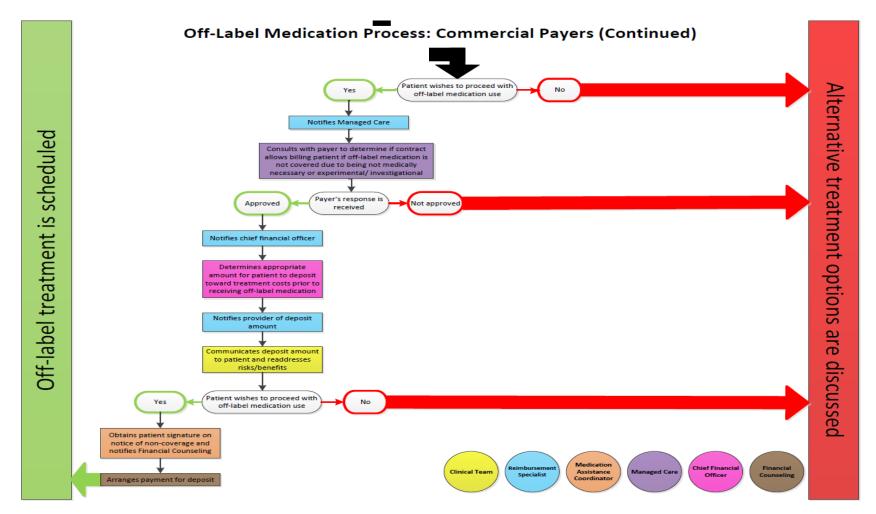




















Dedicate resources payer approval process

- Taking a team approach to immunotherapy payer approval process is key
- Key players:
 - Physician/Advanced Practice Provider (CNP or PA)
 - Pharmacist
 - Reimbursement Specialist
- Effective and traceable form of communication is essential









- Physician/Advanced Practice Provider (CNP or PA)
 - Identify patient who may benefit from I-O therapy
 - Discuss rationale for off-label use if applicable
 - Provide additional primary literature support if necessary
 - Participate in peer to peer conversations if needed









- Pharmacist role
 - Retrieve supporting literature
 - Review CMS approved compendia and NCD/LCD
 - Enter request into off-label use database or spreadsheet so all off label use can be tracked and followed
 - Entry should trigger alerts to pharmacy director, P&T committee chair and reimbursement specialist team









- Reimbursement Specialist role
 - Verify medical insurance
 - Obtain copies of pertinent information from patient medical record (treatment plan, diagnostic studies, etc.)
 - Retrieve supporting literature (if not already provided by team)
 - Verify compendia and NCD/LCD support
 - Identify appropriate ICD-9 code(s) and HCPCS code(s) for medications









- Reimbursement Specialist role
 - Draft letter of medical necessity (prescriber to sign)
 - Fax letter and supporting evidence to payer
 - Confirm payer has received information
 - Continue to follow-up until approval/denial received
 - Request approval number and individual name









Challenges

- Requests for off-label use immediately following FDA approval
- Payers initially not prepared to answer coverage questions and render decisions
- Support programs are different
- Resource intense
 - Clinical team (physicians, pharmacists, APPs)
 - Reimbursement staff









Challenges

- Communication/coordination due to multiple individuals and processes involved (internal/external)
- Out of pocket payments
- Budget impact
 - Current off-label use
 - Pending indications
 - Number of clinical trials









SUMMARY

- It appears that the IO pipeline is very robust with new agents and a myriad indications nearly overwhelming the system in the coming years
- Remembering that these new IO agents are very expensive, its is even more important that all therapy is authorized and patient support is mobilized
- Develop a method to track any off-label requests and their reimbursement or provision for free





