



National Home Infusion Association

Providing solutions for the infusion therapy community

December 7, 2017

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Dear Pamela:

The National Home Infusion Association (NHIA), based in Alexandria, Virginia, represents and advances the interests of providers and suppliers of infusion and specialized pharmacy products and services to home-based patients. We are writing to request that you revise the recent change in pricing methodology for home infusion drugs due to enactment of Section 5004 "Reducing Overpayments of Infusion Drugs" of the *21st Century Cures Act*. (Public Law: 114—258).

Section 5004 of the *21st Century Cures Act* changes the payment structure for infusion drugs under the Medicare Part B Durable Medical Equipment (DME) benefit from an Average Wholesale Price (AWP) metric to an Average Sales Price (ASP) payment methodology. It does not extend past this specific set of home infusion drugs. Therefore, TRICARE should only apply the ASP plus six percent pricing methodology included in Section 5004 to Medicare Part B DME covered infused drugs. We have attached a table listing all the Medicare Part B DME infused drugs as published in the Centers for Medicare and Medicaid's (CMS) "Medicare Local Coverage Determination (LCD): External Infusion Pumps."

The TRICARE Reimbursement Manual was revised on August 2, 2017. The revision added the follow language in Chapter 3 Section 6.2.2.1.3.

2.2.1.3 Effective January 1, 2017, drugs infused through Durable Medical Equipment (DME) shall be priced at ASP plus 6%, in accordance with Section 5004 of the 21st Century Cures Act, and TRICARE's requirement at 10 USC Section 1079 to reimburse like Medicare, where practicable.

Based on the guidance provided in the "TRICARE Reimbursement Manual," home infused drugs, other than those listed in the LCD for external infusion pumps, should not be affected by Section 5004 of the *21st Century Cures Act*. These other home infusion drugs should not be reimbursed at ASP plus 6 percent, but rather at AWP minus five percent. Furthermore, the ASP plus 6 percent pricing methodology should not apply to drugs billed in conjunction with Healthcare Common Procedure Coding System (HCPCS) code A4223 – "Infusion supplies not used with external infusion pump, per cassette or bag (list drugs separately)," as these drugs are not infused through DME.

Our nation's servicemembers, retirees, and their families, deserve the opportunity to receive their infused medications in the comfort of their homes. The home is a cost effective, safe, clinically appropriate site of care and often the preferred choice of patients. We welcome and request the opportunity to meet with you to discuss this issue.

NHIA thanks you for your attention to this matter. Please feel free to contact NHIA's Vice President of Health Information Policy Bill Noyes at Bill.Noyes@nhia.org or 603-736-0308 should you have any questions.

Sincerely,



Tyler J. Wilson
President and CEO
The National Home Infusion Association

Medicare Part B DME Infusion Drugs

HCPCS Code	Short Description	HCPCS Code Dosage
J0133	Acyclovir	5 MG
J0285	Amphotericin B	50 MG
J0287	Amphotericin b lipid complex	10 MG
J0288	Amphotericin b cholesteryl Sul	10 MG
J0289	Amphotericin b liposome inj	10 MG
J0895	Deferoxamine mesylate inj	500 MG
J1170	Hydromorphone injection	4 MG
J1250	Inj dobutamine HCL/250 mg	250 MG
J1265	Dopamine injection	40 MG
J1325	Epoprostenol injection	0.5 MG
J1455	Foscarnet sodium	1000 MG
J1559 JB	IG Hizentra	100 MG
J1561 JB	IG Gamunex/ Gammaked	500 MG
J1569 JB	IG Gammagard liquid	500MG
J1570	Ganciclovir sodium injection	500 MG
J1575 JB	IG Hyqvia	100 MG
J1817	Insulin for insulin pump use	50 UNITS
J2175	Meperidine hydrochl /100 MG	100 MG
J2260	Milrinone lactate	5MG
J2270	Morphine sulfate injection	10 MG
J2274	Morphine sulfate, preservative-free, epidural or intrathecal	10 MG
J2278	Ziconotide	1 Microgram
J3010	Fentanyl citrate injecton	0.1 MG
J3285	Treprostinil	1 MG
J7340	Carbidopa 5 MG/ Levodopa 20 MG	100 MG
J7799	CUVITRU	1 ML
J9000	Doxorubicin hcl	10 MG
J9039	Blinatumomab	1 Microgram
J9040	Bleomycin sulfate injection	15 UNITS
J9065	Inj cladribine per 1 MG	1 MG
J9100	Cytarabine hcl 100 MG inj	100 MG
J9190	Fluorouracil injection	500 MG
J9200	Floxuridine injection	500 MG
J9360	Vinblastine sulfate inj	1 MG
J9370	Vincristine sulfate 1 MG inj	1 MG

Local Coverage Determination (LCD) External Infusion Pumps: https://www.cms.gov/medicare-coverage-database/details/lcd-details.aspx?LCDId=33794&ContrId=388&ver=61&ContrVer=1&CntrctrSelected=388*1&Cntrctr=388&name=&DocType=Active&bc=AAAAAAQAAAAAA%3d%3d&



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Dear Katherine:

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