

Gary R. Feldman, MD, FACP
President

May 14, 2023

Madelaine A. Feldman, MD, FACP
VP, Advocacy & Government Affairs

Senator Pat Spearman
Senate Labor and Commerce Committee
401 South Carson St
Carson City, Nevada 89701

Michael Saitta, MD, MBA
Treasurer

Aaron Broadwell, MD
Secretary

Re: AB 250

Erin Arnold, MD
Director

Chair Spearman,

Leyka M. Barbosa, MD, FACP
Director

The Coalition of State Rheumatology Organizations (CSRO) is a national organization composed of over 30 state and regional professional rheumatology societies, including our member society covering Nevada. CSRO was formed by physicians to ensure excellence and access to the highest quality care for patients with rheumatologic, autoimmune, and musculoskeletal disease. It is with this in mind that we write to you regarding AB 250.

Kostas Botsoglou, MD
Director

Michael S. Brooks, MD, FACP, FACP
Director

Amish J. Dave, MD, MPH
Director

CSRO believes that reimbursement for provider administered drugs in AB 250 is either unclear and needs clarification, or inconsistent with federal law regarding the Maximum Fair Price (MFP) and needs to be amended.

Harry Gewanter, MD, FAAP, MACR
Director

Subsection 2 of AB 250 requires that a provider may not seek reimbursement at a rate that is “higher than the maximum fair price for that referenced drug during the price applicability period.” However, federal law requires that provider administered drugs under Medicare Part B subject to the Maximum Fair Price are reimbursed at 106% of that amount.

Adrienne R. Hollander, MD
Director

Firas Kassab, MD, FACP
Director

Robert W. Levin, MD
Director

Additionally, CSRO is concerned that AB 250 would bar providers from seeking reimbursement for services associated with the administration of the drug and other related overhead. These payments are vital for sustaining the viability of administering drug in the physician office setting. Precluding rheumatologists in Nevada from seeking them would meaningfully reduce the availability of our members services in your state, which would exacerbate existing access issues.

Amar Majhoo, MD
Director

Gregory W. Niemer, MD
Director

Joshua Stolor, MD
Director

If the legislature’s intent is that a provider’s administration reimbursement is not affected in anyway by the bill and the reimbursement limitation created by AB 250 applies only to reimbursement for the drug, this should be clarified, similar to the verbiage related to a pharmacist’s dispensing fee.

HEADQUARTER OFFICE

Ann Marie Moss
Executive Director

CSRO appreciates the opportunity to share our concerns regarding these issues and is happy to answer any questions you may have.

Respectfully,



Gary R. Feldman, MD, FACR

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Board of Directors

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