## **Comparative Effectiveness a Tool for Medicare?**

## BY ALICIA AULT

FROM THE IOURNAL HEALTH AFFAIRS

he use of comparative effectiveness research would give Medicare a sophisticated tool for making coverage decisions on the basis of quality, but its ability to use such data is hamstrung by political interests and the health reform law, according to two researchers.

## Dr. Steven D. Pearson, president of the Institute for Clinical and Economic Review in Boston, and Dr. Peter B. Bach, an attending physician at Memorial Sloan-Kettering Cancer Center in New York, say that Medicare can take advantage of the burgeoning comparative effectiveness movement to change its ways (Health Affairs 2010;29:1796-804).

Some \$1.1 billion was set aside as part of the American Recovery and Reinvest-

**Rx Only** 

ment Act of 2009, and the Department of Health and Human Services announced that 15 experts would guide investments and coordinate research through the Federal Coordinating Council for Comparative Effectiveness Research. However, the council's role is limited in that it will not set clinical guidelines, or establish payment rates or tell Medicare what to cover. The Affordable Care Act further spelled out restrictions on how compara-

These adverse reactions have been chosen for inclusion due to a combination of seriousness, frequency of reporting or potential causal connection to BYSTOLIC. Adverse reactions common in the population have generally been omitted. Because these adverse reactions were reported voluntarily from a population of uncertain size, it is not possible to estimate their frequency or establish a causal relationship to BYSTOLIC exposure: abnormal hepatic function (including increased AST, ALT and bilirubin), acute pulmonary edema, acute renal failure, atrioventricular block (both second- and third-degree), bronchospasm, erectile dysfunction, hypersensitivity (including urticaria, allergic vasculitis and rare reports of angioedema), myocardial infarction, pruritus, psoriasis, Raynaud's phenomenon, peripheral ischemia/claudication, asomolence, syncope, thrombocytopenia, various rashes and skin disorders, verligo, and vomiting.

DRUG INTERACTIONS: CYP2D6 Inhibitors - Use caution when BYSTOLIC is co-admin with CYP2D6 inhibitors (quinidine, propatenone, fluoxetine, paroxetine, etc.) [see Clinical Phar-macology (12.5)]. Hypotensive Agents - Do not use BYSTOLIC with other  $\beta$ -blockers. Closely monitor patients receiving catecholamine-depleting drugs, such as reserpine or guanethidine, because the added  $\beta$ -blocking action of BYSTOLIC may produce excessive reduction of sympabecause the added B-blocking action of BYS10LIC may produce excessive reduction of sympa-thetic activity. In patients who are receiving BYS10LIC and clonidine, discontinue BYS10LIC for several days before the gradual tapering of clonidine. Digitalis Glycosides - Both digitalis glycosides and B-blockers slow atrioventricular conduction and decrease heart rate. Concomitant use can increase the risk of bradycardia. Calcium Channel Blockers - BYS10LIC can exacerbate the effects of myocardial depressants or inhibitors of AV conduction, such as certain calcium antagonists (particularly of the phenylalkylamine [verapamil] and benzothiazepine [diltiazem] classes), or antiarrhythmic agents, such as disopyramide.

anagonists (pantocially of the prenyrality) and the prenyrality and beinzonazephine (unlazeni) classes), or antiarrythythmic agents, such as disopyramide. **USE IN SPECIFIC POPULATIONS: Pregnancy: Teratogenic Effects, Category C** - Decreased pup body weights occurred at 1.25 and 2.5 mg/kg in rats, when exposed during the perinatal period (late gestation, nystocia and reduced maternal care were produced with corresponding increases in late fetal deaths and stillbirths and decreased birth weight, live litter size and pup survival. Insufficient numbers of pups survived at 5 mg/kg to evaluate the offspring for reproductive performance. In studies in which pregnant rats were given nebivoloi during organogenesis, reduced fetal body weights were observed at maternally toxic doses of 20 and 40 mg/kg/day (5 and 10 times the MRHD), and small reversible delays in sternal and thoracic ossification associated with the reduced fetal body weights and a small increase in resorption occurred at 40 mg/kg/day (10 times the MRHD). No adverse effects on embryo-fetal viability, sex, weight or morphology were observed in studies in which nebivolol was given to pregnant rabibits at doses as high as 20 mg/kg/day (10 times the MRHD). Labor and Delivery - Nebivolol caused prolonged gestation and dystocia at doses ≥5 mg/kg in rats (1.2 times the MRHD). These effects were associated with increased fetal deaths and stilliborn pups, and decreased birth weight, live litter size and pup survival rate, events that occurred only when nebivolol was given during the perinatal period (late gestation, parturition and lactation). No studies of nebivolol were conducted in pregnant women. Use BYSTOLIC during pregnancy only if the potential benefit justifies the potential risk to the fetus. **Nursing Mothers** - Studies in rats have shown that nebivolor or smeabolites cross the placental barrier and are excreted in breast mik. It is not known whether this drug is excreted in human mik. Because of the potential for β-blockers to produce serious adverse cross the placental barrier and are excreted in breast milk. It is not known whether this drug is excreted in human milk. Because of the potential for β-blockers to produce serious adverse reactions in nursing infants, especially bradycardia, BYSTOLIC is not recommended during nursing. **Pediatric Use** - Safety and effectiveness in pediatric patients have not been established. Pediatric studies in ages newborn to 18 years old have not been conducted because of incomplete characterization of developmental toxicity and possible adverse effects on long-term fertility *[see Nonclinical Toxicology (13.1)]*. **Geriatric Use** - Of the 2800 patients in the U.S.-sponsored placebo-controlled clinical hypertension studies, 478 patients were 65 years of age or older. No overall differences in efficacy or in the incidence of adverse events were observed between older and younger patients. **Heart Failure** - In a placebo-controlled trial of 2128 patients (1067 BYSTOLIC, 1061 placebo) over 70 years of age with chronic heart failure receiving a maximum dose of 10 mg per day for a median of 20 months, no worsening of heart failure was reported with nebivolol compared to placebo. However, if heart failure worsens consider discontinuation of BYSTOLIC. **OVERDOSAGE:** In clinical trials and worldwide postmarketing experience there were reports of

OVERDOSAGE: In clinical trials and worldwide postmarketing experience there were reports of BYSTOLIC overdose. The most common signs and symptoms associated with BYSTOLIC over-dosage are bradycardia and hypotension. Other important adverse reactions reported with BYSTOLIC overdose include cardiac failure, dizziness, hypoglycemia, fatigue and vomiting. Other adverse reactions associated with β-blocker overdose include bronchospasm and heart block. The BYSTOLUC overdose include cardiac tailure, dizzness, hypoglycemia, tatigue and vomiting. Other adverse reactions associated with  $\beta$ -blocker overdose include bronchospasm and heart block. The largest known ingestion of BYSTOLIC worldwide involved a patient who ingested up to 500 mg of BYSTOLIC along with several 100 mg tablets of acetylsalicylic acid in a suicide attempt. The patient experienced hyperhidrosis, pallor, depressed level of consciousness, hypokinesia, hypotension, sinus bradycardia, hypoglycemia, hypokalemia, respiratory failure, and vomiting. The patient recovered. Because of extensive drug binding to plasma proteins, hemodialysis is not expected to enhance nebivolol clearance. If overdose occurs, provide general supportive and specific symptomatic treatment. Based on expected pharmacologic actions and recommendations for other  $\beta$ -blockers, consider the following general measures, including stopping BYSTOLIC, when clinically warranted: *Bradycardia*: Administer IV atropine. If the response is inadequate, isoproterenol or another agent with positive chronotropic properties may be given cautiously. Under some circumstances, transthoracic or transvenous pacemaker placement may be necessary. *Hypotension*: Administer IV fluids and vasopressors. Intravenous glucagon may be useful. Heart Block (second- or third-degree): Monitor and treat with isoproterenol infusion. Under some circumstances, transthoracic or transvenous pacemaker placement may be necessary. *Congestive Heart Failure*: Initiate therapy with digitalis glycosides and diurtics. In certain cases, consider the use of inotropic and vasodilating agents. *Bronchospasm*: Administer IV acodie as a short-acting inhaled  $\beta_2$ -agonist and/or aminophylline. *Hypoglycemia*: Administer IV glucose. Repeated doses of IV glucose or possibly glucagon may be required. Supportive measures should continue until clinical stability is achieved. The half-life of low doses of nebivolo is 12-19 hours. Call the National Poison Control Center (800-222-1222) for th

Forest Pharmaceuticals, Inc. Subsidiary of Forest Laboratories, Inc. St. Louis, MO 63045, USA Licensed from Mylan Laboratories, Inc. Under license from Janssen Pharmaceutica N.V., Beerse, Belgium

Rev. 02/10 © 2010 Forest Laboratories, Inc.

tive effectiveness findings could be used by the federal government.

Currently, Medicare covers a drug, device, product, or service if the evidence supports its effectiveness. No comparisons are made to comparable technologies. Payment is set separately, based on arcane formulas that cover cost and maybe a small profit.

The authors propose that Medicare instead link coverage and payment decisions at the outset. The program could still use the "reasonable and necessary" threshold in deciding when to cover a product or service. But regulators could adopt a three-tiered effectiveness scale that would let them assign differing reimbursement to each level.

A "superior" rating for products with the fewest side effects, or those that offer the most effective treatment when compared with similar treatments, would garner the highest payment.

Payment for a "comparable" product or service would be slightly less than that for the superior product, as in the difference between what is paid for a brand name and a generic pharmaceutical.

The lowest rating would be "insufficient evidence." The service would be covered and reimbursed at the conventional cost plus a small profit, but the payment level would be reevaluated every 3 years.

The authors said that a 3-year time frame can act as both a carrot and a stick. Having coverage - at current Medicare rates - is better than not having coverage, so innovation will not be stifled. But limiting that rate to only 3 years gives manufacturers and clinicians greater incentives to conduct comparative effectiveness studies, they said.

This scheme might restrict access to new services, but the authors said they believe the "trade-off would be justifiable" because the services being reimbursed at the lower rate would have the least amount of evidence supporting their use.

They also said that using comparative effectiveness data, although threatening to manufacturers, might actually end up encouraging the development of superior products and services.

The new approach raises many conundrums, they acknowledge. It could be difficult to rate a service if comparative effectiveness differed across patient subgroups. And there is the question of whether previously covered services should be grandfathered in.

But overall, said Dr. Pearson and Dr. Bach, using comparative effectiveness data to guide payment would benefit both Medicare and physicians, who would no longer have "perverse incentives to invest in and deliver services that add to the cost but not the quality of care."

Dr. Pearson reported no conflicts. He is a member of the National Institutes of Health's Comparative Effectiveness Research Steering Committee. Dr. Bach made no disclosures. He serves on the Committee on Performance Management of the National Committee for Quality Assurance and the Institute of Medicine's National Cancer Policy Forum.

## BYSTOLIC® (nebivolol) tablets Brief Summary of full Prescribing Information Initial U.S. Approval: 2007

INDICATIONS AND USAGE: Hypertension - BYSTOLIC is indicated for the treatment of hyperten-sion [see Clinical Studies (14.1)]. BYSTOLIC may be used alone or in combination with other antihypertensive agents [see Drug Interactions (7)]. CONTRAINDICATIONS: BYSTOLIC is contraindicated in the following conditions: Severe brady-cardia; Heart block greater than first degree; Patients with cardiogenic shock; Decompensated cardiac failure; Sick sinus syndrome (unless a permanent pacemaker is in place); Patients with severe heartic importance (Child, public B): Patients with a programme the programme of the programme o severe hepatic impairment (Child-Pugh >B); Patients who are hypersensitive to any component of this product

WARNINGS AND PRECAUTIONS: Abrupt Cessation of Therapy - Do not abruptly discontinue BYSTOLIC therapy in patients with coronary artery disease. Severe exacerbation of angina, myocardial infarction and ventricular arrhythmias have been reported in patients with coronary artery disease following the abrupt discontinuation of therapy with  $\beta$ -blockers. Myocardial in-farction and ventricular arrhythmias may occur with or without preceding exacerbation of the artery disease following the abrupt discontinuation of therapy with β-blockers. Myocardial in-farction and ventricular arrhythmias may occur with or without preceding exacerbation of the angina pectoris. Caution patients without overt coronary artery disease against interruption or abrupt discontinuation of therapy. As with other β-blockers, when discontinuation of BYSTOLIC is planned, carefully observe and advise patients to minimize physical activity. Taper BYSTOLIC over 1 to 2 weeks when possible. If the angina worsens or acute coronary insufficiency devel-ops, restart BYSTOLIC promptly, at least temporarily. **Angina and Acute Myocardial Infarction** - BYSTOLIC was not studied in patients with angina pectoris or who had a recent MI. **Bron-chospastic Diseases** - In general, patients with bronchospastic diseases should not receive β-blockers. **Anesthesia and Major Surgery** - Because beta-blocker withdrawal has been associ-ated with an increased risk of MI and chest pain, patients already on beta-blockers should generally continue treatment throughout the perioperative period. If BYSTOLIC is to be contin-ued perioperatively, monitor patients closely when anesthetic agents which depress myocardial function, such as ether, cyclopropane, and trichloroethylene, are used. If β-blockers drener-gic stimuli may augment the risks of general anesthesia and surgical procedures. The β-block-ing effects of BYSTOLIC can be reversed by β-agonists, e.g., dobutamine or isoproterenol. However, such patients may be subject to protracted severe hypotension. Additionally, difficulty in restarting and maintaining the heartbeat has been reported with β-blockers. **Diabetes and Hypoglycemia** - β-blockers may mask some of the manifestations of hypoglycemia, particularly tachycardice β-blockers may postinita: in-induced hypoglycemia, particularly tachycardice B-blockers may mask some of the manifestations of hypoglycemia and delay recovery of serum glucose levels. It is not known whether nebivolo has these effects. Advise patie hypergether about ness possibilities. Inproductors p-blockets may be followed by an exacerbation of the symptoms of hyperthyroidism or may precipitate a thyroid storm. **Peripheral Vascular Disease** -β-blockets can precipitate or aggravate symptoms of arterial in-sufficiency in patients with peripheral vascular disease. **Non-dihydropyridine Calcium Channel Blockers** - Because of significant negative inotropic and chronotropic effects in patients treated with β-blockets and calcium channel blockets of the verapamil and diltiazem type, monitor the ECG and blood pressure in patients treated concomitantly with these agents. **Use with CYP2D6 Inhibitors** - Nebivolol exposure increases with inhibition of CYP2D6 [*see Drug Interactions (7)*]. The dose of BYSTOLIC may need to be reduced. **Impaired Renal Function** - Renal clearance of nebivolol is decreased in patients with severe renal impairment. BYSTOLIC has not been studied in patients receiving diaysis [*see Clinical Pharmacology* (12.4) and Dosage and Administration (2.1)]. **Impaired Hepatic Function** - Metabolism of nebivolol is decreased in patients with moderate hepatic impairment. BYSTOLIC has not been studied in patients with severe hepatic impairment [*see Clinical Pharmacology* (12.4) and Dosage and Administration (2.1)]. **Risk of Anaphylactic Reactions** - While taking β-blockers, patients with a history of severe anaphylac-tic reactions to a variety of allergens may be more reactive to repeated accidental, diagnostic, or therapeutic challenge. Such patients may be unresponsive to the usual doses of epinephrine used to treat allergic reactions. **Phochromocytoma** - In patients with known or suspected phochromocytoma, initiate an α-blocker prior to the use of any β-blocker. **ADVERSE REACTIONS: Clinical Studies Experience** - BYSTOLIC has been evalued for safety in patients with breatering rediction reactive the patients with known or suspected phochromocytoma, initiate an α-blocker prior to the use of any β-blocker.

ADVERSE REACTIONS: Clinical Studies Experience - BYSTOLIC has been evaluated for safety in patients with hypertension and in patients with heart failure. The observed adverse reaction pro in patients with hypertension and in patients with heart failure. The observed adverse reaction pro-file was consistent with the pharmacology of the drug and the health status of the patients in the clinical trials. Adverse reactions reported for each of these patient populations are provided below. Excluded are adverse reactions considered too general to be informative and those not reason-ably associated with the use of the drug because they were associated with the condition being treated or are very common in the treated population. The data described below reflect worldwide clinical trial exposure to BYSTOLIC in 6545 patients, including 5038 patients treated for hyper-tension and the remaining 1507 subjects treated for other cardiovascular diseases. Doses ranged from 0.5 mg to 40 mg. Patients received BYSTOLIC for up to 24 months, with over 1900 patients treated for at least 6 months, and approximately 1300 patients for more than one year. <u>HYPER-TENSION</u>: In placebo-controlled clinical trials comparing BYSTOLIC with placebo, discontinua-tion of therapy due to adverse reactions was reported in 2.8% of patients treated to discontin-and 2.2% of patients given placebo. The most common adverse reactions that led to discontintion of the rapy due to adverse reactions was reported in 2.8% of patients treated with nebivolol and 2.2% of patients given placebo. The most common adverse reactions that led to discontin-uation of BYSTOLIC were headache (0.4%), nausea (0.2%) and bradycardia (0.2%). **Table 1** lists treatment-emergent adverse reactions that were reported in three 12-week, placebo-controlled montherapy trials involving 1597 hypertensive patients treated with either 5 mg, 10 mg, or 20-40 mg of BYSTOLIC and 205 patients given placebo and for which the rate of occurrence was at least 1% of patients treated with nebivolol and greater than the rate for those treated with placebo in at least one dose group. **Table 1**. Treatment-Emergent Adverse Reactions with an Incidence (over 6 weeks) ≥1% in BYSTOLIC-treated Patients and at a Higher Frequency than Placebo-Treated Patients are listed below in the following order: System Organ Class Preferred Term [Placebo (n = 205), Nebivolol 5 mg (n = 459), Nebivolol 10 mg (n = 461), Nebivolol 20-40 mg (n = 677)] **Cardiac Disorders:** Bradycardia (0, 0, 0, 1); **Gastrointestinal Disorders:** Diarnes (2, 2, 2, 3); Nausea (0, 1, 3, 2); **General Disorders:** Headache (6, 9, 6, 7); Dizziness (2, 2, 2, 3); **Nausea** (0, 1, 3, 2); **General Disorders:** Headache (6, 9, 6, 7); Dizziness (2, 2, 2, 3); **Psychiatric Disorders:** Insomia (0, 1, 1, 1); **Respiratory Disorders:** Disorders of the reported adverse reactions with an incidence of at least 1% in the more than 4300 patients treated with BYSTOLIC in controlled or open-label trials except for those already appearing in **Table 1**, terms too general to be informative, minor symptoms, or adverse reactions unlikely to be attrib-utable to drug because they are common in the population. These adverse reactions were in most cases observed at a similar frequency in placebo-treated patients in the controlled studies. **Body as a Whole:** asthenia. **Gastrointestinal System Disorders:** parasethesia. **Labora-tory Abnormalities** - In controlled montherapy trials of hy and 2.2% of patients given placebo. The most common adverse reactions that led to discontin