Access to Subcutaneous Immunoglobulin (SCIG) for Primary Immunodeficiencies (PI) — Support the Preserving Patient Access to Home Infusions Act (S3457/HR6218)

Medicare beneficiaries with PI qualify for SCIG under the temporary (effective now) and permanent (effective January 1, 2021) home infusion services benefit under Part B. While IDF is grateful for this benefit, providers are not being reimbursed adequately or for all services. Without modifications, providers may not be able to continue to provide SCIG to PI beneficiaries. In addition, an update to the drug exclusion provision is required to ensure that all SCIG medications now covered will continue to be once the permanent benefit takes effect. **Passage of S3457/HR6218 will ensure that Medicare beneficiaries with PI will have continued access to all SCIG products and services.**

**About PI and SCIG Treatment**
In the United States there are an estimated 250,000 people diagnosed with PI. PIs include more than 400 types of rare, chronic disorders in which part of the body’s immune system is missing or functions improperly. Fortunately, most people with PI can live healthy productive lives if they receive lifelong immunoglobulin (Ig) replacement therapy. Ig is a blood plasma product that helps prevent frequent and severe infections and may be administered subcutaneously (SCIG) or intravenously (IVIG) at home or in health care settings as determined by the patient’s physician. Currently, approximately 60% of those on Ig use SCIG and 40% use IVIG. SCIG can be administered by the patient at home with training and consultation as needed by a medical professional. There are approximately 6,000 Medicare beneficiaries with PI dependent on SCIG.

**Preserving Patient Access to Home Infusions Act Background**
In December 2016, Congress passed the 21st Century Cures Act, which included a services fee to pay for items and professional services needed for in-home SCIG therapy. The original act delayed the fee implementation for 4 years, so in 2017 Congress passed legislation providing for a temporary benefit to address the coverage gap. In January 2021, the permanent home infusion services benefit will begin, supporting access to nursing, training and other services needed to deliver drugs infused using pumps in beneficiaries’ homes. When the permanent benefit is implemented in January, certain medications classified as self-administered drugs will be excluded from coverage, even if the temporary services payment provided reimbursement for such products. This includes one product commonly used by individuals with PI. The Preserving Patient Access to Home Infusions Act is bipartisan legislation introduced to address these concerns by ensuring adequate Part B coverage and reimbursement for home infusion medications and services used by Medicare beneficiaries, including individuals with PI.

**Benefits for Beneficiaries with PI**
Passage of S3457/HR6218 will help ensure that individuals with PI can continue to receive their SCIG treatment in the home. This provides another option for vulnerable individuals to avoid facilities with other patients to decrease risk of exposure to pathogens, including COVID-19. Enabling adequate reimbursement ensures that patients are provided training and support needed to administer SCIG at home. The bill also ensures that PI beneficiaries are able to continue to access the specific Ig medications prescribed by their physician, including those classified as self-administered drugs.

**Congressional Call to Action**
Cosponsor the Preserving Patient Access to Home Infusions Act (S. 3457, H.R. 6218) to ensure Medicare beneficiaries with PI have continued access to all SCIG products, services, training and supplies necessary to receive their treatment at home.