

July 21, 2017

Medical Advisory Committee
Oregon Workers' Compensation Division
Attention: Juerg Kunz

Subject:

Follow-up on testimony for appropriate use of SCS in Oregon workers' compensation population

Dear Mr. Kunz,

Thank you again for allowing me to testify before the Medical Advisory Committee (Committee) on June 2, 2017. I appreciated the opportunity to be a part of the discussion, and am happy to provide the additional information addressing specific topics from the Committee related to evidence supporting spinal cord stimulation (SCS).

This letter provides information in five general categories following the discussion of the Committee: (1) comments on the SAIF data analysis report; (2) references to guidelines developed by the Neuromodulation Appropriateness Consensus Committee (NACC); (3) detail of the UK National Institute for Health and Care Excellence (NICE) technology assessment and guidance for SCS; (4) detail of economic evidence for SCS; and (5) a summary of literature relating to psychological evaluations for SCS therapy. Three of these topics were requested during my testimony, while the topic related to psychological evaluations for SCS therapy is something that I discussed with Dr. Rischitelli following the meeting's adjournment.

Medtronic believes in providing access to SCS for patients for which SCS will provide positive clinical outcomes. The literature below supplements my testimony and our previous literature summary submitted on May 31, 2017.

Neurostimulation for chronic pain is an exciting and evolving field.¹ There are manufacturers with many recent or current clinical studies examining different devices, different ways of applying stimulation to achieve optimal outcomes, and different approaches to best treat chronic pain. This field will continue to change and grow in the future as these studies are published, technologies are introduced, and recommendations are adopted. By taking an approach to balance evidence with technological and clinical innovation, the Committee can ensure appropriate patients in the Oregon workers' compensation program are offered a therapy to improve their pain and quality of life while providing cost-effective therapy.

(1) SAIF Data Analysis Report Comments

We appreciate the SAIF SCS claims analysis, however we have concerns about the coding errors used to identify patients and examine healthcare utilization. This results in non-SCS patients being examined for long-term healthcare use changes.

With SCS therapy, the patient receives a trial or test stimulation, wherein temporary leads are implanted in the epidural space. The patient then goes home and assesses the effectiveness of the therapy for 3 – 10 days. After that time, if a patient had a successful trial as measured by reduced pain, increased function, and improved quality of life, they then may proceed to a permanent implant and are considered SCS patients. This allows the cost for a permanent SCS system to be incurred only in patients for whom the therapy has been demonstrated to be effective.

The SAIF analysis includes both patients who test SCS therapy with a temporary trial stimulation lead, as well as patients receiving long-term SCS therapy via a permanent SCS system. This results in an incorrect attribution of costs and opioid utilization, which are then ascribed to both SCS and non-SCS patients. The modifications to the coding inclusion and exclusion that are found in Appendix A would more accurately identify SCS patients and correctly categorize subsequent healthcare interventions as revision or replacement. There is no evidence that the brief test stimulation period will always result in long-term clinical benefit, as the current analysis assumes.

The analysis also looks at long-term reduction in opioid use, beyond a 12-month period. We believe that reducing opioids in patients is a multi-factorial process that is most successful when addressing topics beyond simply pain relief,² and suggest the Committee consider the opioid usage not only at 12-months after implant but also review the 2-year and 3-year data provided by SAIF. The long-term reduction in opioids over this 2- and 3-year period may better reflect the complexity of these patients who have been in pain an average of 12 years prior to implant.³

(2) NACC Guidelines

The Neuromodulation Appropriateness Consensus Committee, (NACC) is an independent group of physicians from multiple specialties representing multiple professional societies with the goal of promoting the use of neurostimulation technology in appropriate patients, to increase the overall outcomes of patients receiving this therapy, and to reduce therapy complications in these patients. To that end, NACC has developed (and continues to develop) consensus guidelines on the appropriate use of neurostimulation procedures for chronic pain. A listing of current NACC publications is provided below.^{1,4-9}

The first NACC publication included an evidence review of topics such as the effectiveness of SCS for certain indications, implanter training, patient selection, and a check-list of best practices for trialing.⁴ More recent topics have focused on ways to reduce complications such as infection and neurological injury, as well as bleeding and coagulation management.⁷⁻⁹

We recommend the Committee review the NACC guidelines for insight to the existing body of literature. The Committee may desire to adopt some of the NACC recommendations regarding

implantation requirements, best practices for patient screening, and complication-reduction techniques.

(3) NICE Guidelines

The National Institute for Health and Care Excellence (NICE) produces evidence-based guidelines, technology assessments, and advice for the UK National Health Service. In 2008, NICE performed a technology appraisal to assess the clinical and cost-effectiveness of SCS to identify patient populations in which SCS is clinically- and cost-effective.¹⁰ NICE concluded:

Spinal cord stimulation is recommended as a possible treatment for adults with chronic pain of neuropathic origin if they:

- *continue to experience chronic pain (measuring at least 50 mm on a 0–100 mm visual analogue scale) for at least 6 months despite standard treatments, and*
- *have had a successful trial of spinal cord stimulation as part of an assessment by a specialist team.*

Treatment with spinal cord stimulation should only be given after the person has been assessed by a specialist team experienced in assessing and managing people receiving treatment with spinal cord stimulation¹⁰.

NICE also commissioned a health technology assessment consisting of a systematic evidence review and economic evaluation of SCS therapy.¹¹ The model found SCS to be cost-effective for both FBSS and CRPS. In addition, the assessment concluded:

The evidence suggested that SCS was effective in reducing the chronic neuropathic pain of FBSS and CRPS type I. For ischaemic pain, there may need to be selection criteria developed for CLI, and SCS may have clinical benefit for refractory angina short term. Further trials of other types of neuropathic pain or subgroups of ischaemic pain, may be useful.¹¹

In 2013, NICE reviewed this previous decision and recommended the technology appraisal be moved to the “static” list, meaning that the recommendations had a previous full review, and that no additional clinical research would modify the results of the review at that time.^{12,13} NICE continues to recommend SCS for individuals with chronic neuropathic pain as a clinically- and cost-effective therapy.

(4) Economic Evidence for SCS

While testifying before the Committee, there was a request to follow-up with the economic evidence of SCS for a variety of indications. Below is a summary of the current health economic evidence for SCS.

A recent publication summarized much of the economic evidence for SCS.¹⁴ We recommend reviewing this, however we recognize that this article includes some key landmark publications that are included in the summary text but missing in the table summary within the article.¹⁵ We encourage the Committee to supplement the recent publication with the summaries below to get a full picture of the current economic evidence of SCS.

Economic Evidence Search Strategy

A literature search was performed via PubMed in June 2017. The search strategy is detailed below, with the specific search wording found in Appendix B.

Economic Evidence Search Results

The PubMed search identified 477 articles that met the search strategy criteria. Abstracts of the articles were reviewed to identify articles of interest to this submission. This resulted in 40 articles that were reviewed for inclusion in this summary

Articles were selected if they were a primary economic evaluation of SCS for chronic pain. Review articles were examined for additional studies that may be missing from the original search.

Articles were further divided into three different categories:

- A. Articles that are primary economic analyses, including cost-effectiveness, cost-utility, and cost-benefit for SCS for chronic intractable pain of the trunk and/or limbs, or recent reviews of the primary studies. Indications were selected for on-label use of SCS. (18 articles)
- B. Articles that leverage administrative claims data to provide a descriptive analysis of a research question of interest to payers, hospitals, or the healthcare system. (11 articles)
- C. Articles that are primary economic analyses such as that in (A) above, but for which the indication under investigation is not on-label for use of SCS in the US. We do not advocate for use of SCS in this population, however the Committee expressly asked about the use of SCS in these populations. These studies are not summarized here, but citations are provided for reference for the Committee's own investigation and review.^a (11 articles)

These groups are summarized below.

A) Economic analyses, primary research and systematic reviews. Below is a summary of the key cost-effectiveness and health economic studies for SCS for FBSS and for CRPS. Numerous studies and economic models have concluded that SCS to treat FBSS and CRPS is cost-effective, meaning that SCS provides value for money. Some key findings include that SCS for FBSS is cost-effective compared with medical management¹⁶, SCS is less costly and more effective than reoperation¹⁷, SCS for CRPS is cost-effective compared with medical management¹⁸, Failed reoperation followed by SCS was more expensive than starting with SCS and later choosing reoperation¹⁶. Preventing or reducing complications through advancements in technology and methodology such as that

^a Medtronic does not market its products for off-label uses, and makes no representations or comment regarding its safety or efficacy.

recommended by the NACC can further reduce the cost of SCS. Also included are recent reviews of primary economic evidence.

Important considerations when reviewing these studies include considering the payment system, the similarity of inclusion or exclusion of patients between studies (i.e. are patients with failed trials included in the intent-to-treat analysis, or is it only patients with successful trials and successful therapy in a study comparator group), and the cost perspective (societal, payer, hospital, etc.).

Economic Analyses of SCS for FBSS

Study	Description	Cost Analyses: Incremental Cost-Effectiveness Ratio (ICER) per Quality-Adjusted Life year (QALY) at Willingness-to-Pay (WTP) Thresholds or Actual/Estimated Costs	Conclusions & Notes
Hoelscher et al, 2017 ¹⁹	To review published literature on the cost-effectiveness of SCS therapy	Review: The search identified 21 articles examining cost with or without also assessing effectiveness. The majority of articles support that SCS is an effective treatment that represents an efficient use of healthcare resources, and value-for-money.	The majority of studies reviewed conclude that SCS is cost-effective compared with reoperation or conventional medical management (CMM)
Yepes C, et al. 2015 ²⁰	A cost-utility analysis examining the cost-effectiveness of SCS in Colombia. Poster presentation from ISPOR. US Dollars	SCS vs. Reoperation (FBSS): • 62% probability that SCS is cost-effective at a WTP of \$24,300, as recommended by WHO for developing countries ICER of US \$10,293/QALY	SCS has been demonstrated to be cost-effective in many healthcare systems when compared with reoperation.
Zucco F, et al. 2015 ²¹	To assess the cost-utility of SCS for FBSS in Italy Euros	SCS vs. CMM (FBSS): • 80% & 85% probability that SCS is cost-effective at a WTP of €60,000 from payer and society perspective respectively ICER of €38,372 /QALY for societal perspective and €47,000 /QALY for payer perspective	SCS was more cost-effective than CMM in patients with FBSS. The cost-effectiveness of SCS was well below the maximum WTP thresholds.
Annemans et al, 2014 ²²	Compares SCS for FBSS using high frequency stimulation parameters (HF-SCS) with CMM and Reoperation, and SCS using high frequency stimulation parameters (HF-SCS) to traditional parameters. British Pounds	HF-SCS vs. CMM ICER of £3,153/QALY HF-SCS vs. Reoperation ICER of £2,666/QALY HF-SCS vs. Traditional SCS HF-SCS for back pain found cost-effective compared with traditional SCS for leg pain in the FBSS patient population • No sensitivity analysis published that estimates probability of cost-effectiveness of SCS at a WTP.	SCS was more cost-effective than both CMM and Reoperation. A comparison of HF-SCS and traditional SCS found HF-SCS to be cost-effective relative to traditional SCS systems. Note: The traditional SCS effectiveness estimation includes patients who were randomized to SCS but failed their initial temporary trial stimulation; they are still analyzed in the traditional SCS group. The HF-SCS effectiveness estimation includes only those who have a successful test stimulation and excludes those who failed the temporary trial stimulation.
Kumar, et al. 2013 ²³	To evaluate the cost-effectiveness of SCS vs. CMM alone in the Canadian healthcare system. 2012 Canadian dollars	SCS vs. CMM (FBSS): • 75% probability that SCS is cost-effective at a WTP of CAN \$50,000 ICER of CAN \$9,293/QALY	SCS was cost-effective compared with CMM in patients with FBSS. The cost-effectiveness of SCS was well below the maximum WTP thresholds.
Hollingworth, et al. 2011 ²⁴	To estimate cost-effectiveness of SCS among workers' compensation	Mean medical costs: SCS: \$52,091 Pain clinic: \$34,800 Usual care: \$23,963 5% of SCS patients, 3% of pain clinic	The reported cost savings of SCS may not be replicated in workers'

Cost Analyses: Incremental Cost-Effectiveness Ratio (ICER) per Quality-Adjusted Life year (QALY) at Willingness-to-Pay (WTP) Thresholds or Actual/Estimated Costs			
Study	Description		Conclusions & Notes
	recipients over 24 months. US dollars	patients, and 10% of usual care patients achieved their primary goal at 24 months.	compensation within 2 years after SCS generator implant.
Mekhail N, et al. 2011 ²⁵	To review the clinical and economic evidence of SCS for FBSS.	Review: The review summarizes the results from 6 different economic evidence studies on SCS for FBSS. The summarized articles support that SCS is a cost-effective treatment for FBSS that represents an efficient use of healthcare resources, and value-for-money.	SCS for FBSS is cost-effective in carefully-selected patients when compared with CMM or reoperation. This article frames the evidence to support the needs of case managers. This is a good overview of the clinical and economic evidence of SCS through 2010 and is geared towards individual decision-makers at payers.
Taylor, et al. 2010 ¹⁶	To evaluate cost-effectiveness of SCS vs. medical management alone or reoperation in patients with FBSS. Decision analytic cost-utility model developed by the National Institute of Health and Clinical Excellence; 15-year horizon. British pounds	SCS vs. CMM: • 89% probability that SCS is cost-effective at a WTP of £20,000 • 98% probability at a WTP of £30,000 ICER of £5,624/QALY SCS vs. reoperation: • 82% probability that SCS is cost-effective at a WTP of £20,000 • 93% probability at a WTP of £30,000 ICER of £6,392/QALY	SCS was more cost-effective than CMM or reoperation in patients with FBSS. The cost-effectiveness of SCS was well below the maximum WTP thresholds. A rechargeable battery would be more cost-effective than a non-rechargeable when a patient's stimulation requirements would result in a non-rechargeable battery longevity of <4 years.
Kumar and Bishop. 2009 ²⁶	To determine costs of 197 patients trialed with SCS; 161 (81.7%) were implanted. Retrospective review. 2007 US dollars	Average total cost: Medicare: \$32,882 Major insurer (Blue Cross Blue Shield): \$57,896 Failed trial cost: Medicare: \$10,900 Major insurer: \$24,686 Annual average maintenance cost: Medicare: \$5,071 Major insurer: \$7,277 Per-patient complication cost: Medicare: \$1,034 Major insurer: \$2,293	SCS costs were less for Medicare patients than for those covered by a major insurance company. Active management of SCS therapy should include allocation for annual maintenance and resolution of complications.
Simpson, et al. 2009 ¹¹	To explore the cost-effectiveness of SCS in the treatment of chronic pain in the United Kingdom up to 15 years post-implantation. British pounds	SCS vs. CMM: • 80% probability that SCS is cost-effective at a WTP of £20,000 • > 95% probability at a WTP of £30,000 ICER of £9155/QALY SCS vs. reoperation: • 90% probability that SCS is cost-effective at a WTP of £20,000 • 98% probability at a WTP of £30,000 ICER of £7954/QALY	SCS dominated CMM and reoperation as the most cost-effective option when device longevity was >7 years. SCS achieved "economic dominance" by conferring better treatment success and more QALYs at a lower cost than alternative treatments.
Manca A, et al. 2008 ²⁷	A cost-consequence analysis exploring the cost of SCS for FBSS compared with CMM from the PROCESS RCT. Canadian dollars, Euros	SCS vs. CMM at 6 months: Mean per-patient cost: SCS: CAN\$19,486; 12,653 euros CMM: (CAN\$3994; 2594 euros) Mean difference in per-patient quality of life (EQ-5D) gain: SCS group gained a mean EQ-5D score difference of 0.25 [p < 0.001] at 3-months and 0.21 [p < 0.001] at 6-months	SCS + CMM compared with CMM alone has higher costs to the healthcare system, but patients also experience improvements in quality-of-life.
Hornberger J, et al. 2008 ²⁸	A cost-effectiveness analysis of rechargeable vs. non-rechargeable SCS systems	SCS Rechargeable vs. Non-rechargeable: The use of a rechargeable SCS system could save up to US \$150,000 over a patient's lifetime when compared with non-rechargeable SCS system.	Rechargeable SCS systems are cost-effective in patients who are good candidates for rechargeable systems.

Cost Analyses: Incremental Cost-Effectiveness Ratio (ICER) per Quality-Adjusted Life year (QALY) at Willingness-to-Pay (WTP) Thresholds or Actual/Estimated Costs			
Study	Description		Conclusions & Notes
North, et al. 2007 ¹⁷	To analyze cost-effectiveness of SCS vs. reoperation. Hospitalization and professional charges tracked over 4 years for 40 of 50 patients in a prospective RCT. US dollars	<p>Mean per-patient cost (intention-to-treat analysis): SCS: \$31,530 Reoperation: \$38,160</p> <p>Treatment cost: SCS: \$48,357 (7/14 patients) Reoperation: \$105,928 (2/8 patients)</p> <p>Mean per-patient cost for patients who crossed from original treatment: Reoperation to SCS: \$117,901 (5/13 patients) SCS to reoperation: \$260,584</p> <p>SCS vs. reoperation:</p> <ul style="list-style-type: none"> • 72% probability that SCS is cost-effective at a WTP of \$40,000 	SCS was more effective and less expensive than reoperation. Failed reoperation followed by SCS was more expensive than starting with SCS and later choosing reoperation.
Kumar, et al. 2006 ²⁹	To calculate actual healthcare costs for complications of SCS in 160 consecutive patients over 10-years; 51 complications occurred in 42 patients. 2005 Canadian dollars	<p>Mean cost for SCS implantation: \$23,205/patient</p> <p>Mean annual maintenance cost (uncomplicated case): \$3,609, including INS replacement every 4 years</p> <p>Mean cost to rectify a complication over a 10-year period: \$7,092 (range \$130 to \$22,406)</p> <p>Mean cost to explant an SCS system: \$1,739</p>	Preventing or reducing complications through advancements in technology and methodology helps reduce the cost of SCS.
Taylor RJ, et al. 2005 ³⁰	To assess the cost-effectiveness of SCS for FBSS 2003 Euros	<p>SCS vs. CMM: SCS was dominant to CMM over the lifetime of a patient (i.e. SCS is more effective and less costly). SCS was more costly than CMM in a short-term horizon, but was also more effective.</p>	SCS is less costly and more effective than CMM when using a long-term horizon (patient lifetime). SCS is more costly and more effective than CMM when using a short-term time horizon. SCS benefits should be considered over the lifetime of a SCS device.
Kumar, et al. 2002 ³¹	To calculate actual 5-year costs for treating FBSS with SCS (n = 60) or medical management alone (n = 44). Canadian dollars	<p>Mean total and (annual) costs: SCS: \$29,123 (\$5,825/yr) CMM: \$38,029 (\$7,606/yr)</p>	Higher costs in the CMM group reflect greater use of healthcare resources (medications, rehabilitation, other pain-control therapies). At 2.5 years, the costs of SCS became less than for CMM.

Economic Analyses of SCS for CRPS

Cost Analyses: Incremental Cost-Effectiveness Ratio (ICER) per Quality-Adjusted Life year (QALY) at Willingness-to-Pay (WTP) Thresholds or Actual/Estimated Costs			
Study	Description		Conclusions
Kumar, et al. 2013 ²³	To evaluate the cost-effectiveness of SCS vs. CMM alone in the Canadian healthcare system. 2012 Canadian dollars	<p>SCS vs. CMM (CRPS):</p> <ul style="list-style-type: none"> • 89% probability that SCS is cost-effective at a WTP of CAN \$50,000 ICER of CAN \$11,216/QALY 	SCS was more cost-effective than CMM in patients with CRPS. The cost-effectiveness of SCS was well below the maximum WTP thresholds.

Cost Analyses: Incremental Cost-Effectiveness Ratio (ICER) per Quality-Adjusted Life year (QALY) at Willingness-to-Pay (WTP) Thresholds or Actual/Estimated Costs			
Study	Description		Conclusions
Kemler, et al. 2010 ¹⁸	To compare SCS to medical management alone. Decision analytic cost-utility model developed by the National Institute of Health and Clinical Excellence; 15-year time frame. British pounds	SCS vs. CMM: • 87% probability that SCS is cost-effective at a WTP of £30,000 ICER of £3,562/QALY	SCS was more cost-effective than CMM in treating CRPS. When the longevity of an INS is ≤4 years, a rechargeable (and initially more expensive) INS lasting more than 9 years is more cost-effective than a nonrechargeable INS.
Simpson, et al. 2009 ¹¹	To explore the cost-effectiveness of SCS in the treatment of chronic pain in the United Kingdom up to 15 years post implantation. British pounds	SCS vs. CMM: • > 40% probability that SCS is cost-effective at a WTP of £20,000 • > 60% at a WTP of £30,000 ICER of £18,881/QALY	SCS dominated CMM as the most cost-effective option.
Kumar, et al. 2006 ²⁹	To calculate actual healthcare costs for complications of SCS in 160 consecutive patients over 10-years; 51 complications occurred in 42 patients. 2005 Canadian dollars	Mean cost for SCS implantation: \$23,205/patient Mean annual maintenance cost (uncomplicated case): \$3,609, including INS replacement every 4 years Mean cost to rectify a complication over a 10-year period: \$7,092 (range \$130 to \$22,406) Mean cost to explant an SCS system: \$1,739	Preventing or reducing complications through advancements in technology and methodology helps reduce the cost of SCS.
Kemler and Furnee. 2002 ³²	To calculate lifetime costs for 54 CRPS patients in the Netherlands. Euros	SCS plus PT vs. PT: Lifetime costs for SCS plus PT (€171,153) were lower than for PT alone (€229,624), regardless of the figure selected, discount rate, implantation rate, and complication rate.	Lifetime costs for SCS plus PT were 25% lower than for PT alone.

B) Administrative Claims Analysis. Claims data can be used to examine the real-world use of health interventions and procedures, and to understand the impact of comorbidities, healthcare utilization, cost, and complications as you follow patients throughout the healthcare system.

There is an emerging body of literature utilizing claims data to answer specific questions on SCS and chronic pain. While these are not Level 1 or Level 2 studies on clinical effectiveness, these retrospective studies can answer specific questions of interest to payers and clinicians, and often have much larger sample sizes than other types of prospective clinical trials. Claims analyses can explore the impact of an intervention on healthcare utilization or patient characteristics within the healthcare system, describe patients more likely to receive a complication, and explore the success of a therapy by clinician characteristic. This evidence is useful for clinicians to identify ways to provide care in a cost-efficient way, but also for payers to understand factors that may impact overall cost of care and coverage.

Important considerations when reviewing these studies include considering the year of data relative to the payment system changes and technology availability, and understanding the patient population in the different data sources.

Our search identified 11 administrative claims analyses for SCS. (We excluded studies not exclusive to SCS.) A summary of claims analyses examining SCS therapy are detailed below.

Study	Description	Results	Conclusions
Han JL, et al. 2017 ³³	To explore predictors of SCS system explantation Database: Truven Marketscan, Commercial Claims, Medicare Supplemental, and Medicaid populations Years: 2007 – 2012	SCS patients with higher baseline costs, higher post-implant pain cost and procedures, increased age, and increased comorbidity profile were more likely to have an SCS system explant. In addition, patients with implants performed by low-volume providers were more likely to receive an explant than those with higher volume implants, suggesting that provider experience may influence the likelihood of explantation.	There are patient and provider characteristics associated with a higher likelihood of explant. Care should be taken to investigate appropriate pain treatment for patients with a higher likelihood of explant.
Murphy KR, et al. 2017 ³⁴	To explore whether implanters with a higher volume of implants have a higher trial-to-implant conversion ratio than lower-volume implanters Database: Truven Marketscan, Commercial Claims, Medicare Supplemental, and Medicaid populations Years: 2007 – 2012	Conversion to a permanent implant was more likely for female patients (1.13 [95% CI: 1.05–1.22], $p < 0.001$) and high volume providers (1.12 [95% CI: 1.02–1.22], $p = 0.014$)	High-volume providers had higher trial-to-implant conversion rates than low-volume providers. Provider volume may be a predictor of successful outcomes, and may be considered when referring patients to SCS therapy.
Lad SP, et al. 2016 ³⁵	To explore whether time from pain to SCS impacts post-implant costs and healthcare resource utilization (HCRU) Database: Truven Marketscan, Commercial Claims and Medicare Supplemental populations Years: 2008 – 2013	For each additional year between pain onset to SCS, patients had an increased likelihood of being high utilizers of HCRU after implant including: <ul style="list-style-type: none"> • 33% more likely to be in High medical expenditures vs. low medical expenditures quartile (OR 1.33 [1.01, 1.77]) • 43% more likely to be in high opioid cost group vs. low opioid cost group • 55% more likely to be in high hospitalization group vs. low hospitalization group 	Considering SCS early in the chronic pain care continuum may result in decreased expenditures, lower opioid and healthcare utilization, and increased outcomes.
Petraglia FW, et al. 2016 ³⁶	To quantify the incidence of spinal cord injury (SCI) in SCS, examining both percutaneous and surgical paddle lead types Database: Truven Marketscan, Commercial Claims, Medicare Supplemental, and Medicaid populations Years: 2000 – 2009	For SCS, the incidence of SCI was 2.13%, and the incidence of spinal hematoma was 0.71%. There was no statistically significant difference in these complications by lead type.	Overall incidence of SCI is low, and there is no difference in complication rate by lead type.
Desai MJ, et al. 2015 ³⁷	To estimate the need for MRI in the SCS implanted population. Database: Truven Marketscan, Commercial	Approximately 82%-84% of SCS-implanted patients are expected to need at least one MR image within 5 years of SCS implant. Further, 59-74% of patients will require a non-spine MR image within 10 years of SCS implant.	There is a need for MR-conditional SCS systems to address future healthcare needs of this patient population.

Study	Description	Results	Conclusions
	Claims and Medicare Supplemental populations Years: 2008 – 2011		
Huang KT, et al. 2015 ³⁸	To examine the temporary trial lead test to permanent generator implant, and to identify factors associated with a successful SCS trial conversion to implant. Database: Truven Marketscan, Commercial Claims, Medicare Supplemental, and Medicaid populations Years: 2000 – 2009	41% of patients (8,982/21,672) receiving a trial in the Truven Marketscan database received a permanent generator implant within 3 months. Some factors associated with SCS system conversion to permanent implant include younger age ($p < 0.0001$) and never having a previous SCS trial in the past ($p < 0.0001$).	Patient-specific factors may impact successful trial-to-implant conversion. SCS therapy is not fully realized unless the patient receives a permanent generator implant. The authors recommend careful patient selection.
Lad SP et al. 2014 ³⁹	To examine the utilization of SCS and lumbar reoperation in the failed back surgery syndrome patient population, exploring whether people are following the Level 1 evidence from North that recommended SCS as more clinically- and cost-effective than reoperation. Database: Truven Marketscan, Commercial Claims, Medicare Supplemental, and Medicare populations Years: 2000 – 2009	For FBSS patients with SCS ($n = 395$) and reoperation ($n = 16,060$), the SCS group had lower complications at 30, 60, and 90 days (14.42% vs. 6.51%, $p < 0.0001$). In a matched analysis, SCS had lower hospital length of stay ($p < 0.0001$), and hospital charges ($p = 0.0162$) at index compared with reoperation patients. There was no significant difference in charge for outpatient, emergency department, and medication charges or 2-year cost.	SCS appears to be underutilized in the FBSS population, even while demonstrating lower complication rates and shorter hospital length-of-stay than reoperation.
Missios S et al. 2014 ⁴⁰	To examine the socioeconomic characteristics of patients with access to SCS therapy to those without access to SCS therapy in an outpatient setting. Database: State Ambulatory Surgery Databases and State Inpatient Databases, respectively, for New York, California, Florida, and North Carolina Years: 2005 – 2008	Patients were more likely to have outpatient access to SCS therapy when they were male (OR 1.22), Caucasian (1.25), while patients with a higher comorbidity index (OR 0.36) and public insurance (0.75) were more likely to access SCS in an inpatient setting. Total charge for SCS in the outpatient setting was significantly lower than in the inpatient setting (\$60,624 vs \$22,288).	Further investigation is needed to understand how to resolve the socioeconomic disparities in access to care.
Babu R et al. 2013 ⁴¹	To explore costs, healthcare utilization for SCS patients with percutaneous lead implantation compared with SCS patients with surgical paddle lead implantation. Database: Truven Marketscan, Commercial Claims, Medicare Supplemental, and Medicaid populations Years: 2000 – 2009	Patients in both groups had similar healthcare costs. Percutaneous lead implant patients were more likely to undergo reoperation at two year (6.3% vs. 3.5%, $p = 0.0056$) and five year timeframes, while patients with surgical paddle leads were more likely to develop a complication post-implant (3.4% vs. 2.2%, $p = 0.0005$).	In older technology, SCS patients had similar long-term healthcare costs regardless of the type of permanent lead. There were differences in healthcare revision and complication rates, with no one type of lead providing an advantage in healthcare utilization.

Study	Description	Results	Conclusions
Huang KT et al. 2013 ⁴²	To evaluate how insurance type impacts outcomes after SCS surgery. Database: Truven Marketscan, Commercial Claims, Medicare Supplemental, and Medicare populations Years: 2000 – 2009	Both the commercial and Medicaid groups had similar two-year reoperation rates and 30- and 90-day complication rates. Medicaid patients had higher medication prescriptions, emergency visits, and length of stay. Commercial patients had higher overall costs.	Insurance status seems to have more of an impact on cost and other healthcare utilization than it does on SCS therapy-related healthcare follow-up. Socioeconomic status appears to influence outcomes and utilization after SCS surgery.
Lad SP et al. 2010 ⁴³	To characterize trends in inpatient SCS implantation Database: AHRQ Healthcare Cost and Utilization Project (HCUP) Years: 1993 – 2006	Length of stay decreased from 1993 (4.0 days) to 2006 (2.1 days) for inpatient SCS placement. The cost of surgery increased from 1993 to 2006. (Note: these were not inflation-adjusted as in many other economic analyses)	Cost and clinical effectiveness are both useful factors to consider when studying SCS.

C) Economic Analyses of other indications. The Committee requested evidence for indications that are not currently on-label for Medtronic. There are many articles available in the literature that examine the cost-effectiveness of SCS in indications such as angina, and diabetic peripheral neuropathy. Citations are listed in the references, and are available to the Committee should there be interest in further examining this literature, however they are not summarized here.⁴⁴⁻⁵⁴

(5) Psychological Evaluations and Patient Selection

Following the June Committee meeting, I spoke with Dr. Rischitelli about patient selection and best practices to screen patients who are good candidates for SCS compared with those who may have confounding factors that could influence their outcomes. This was touched on in Dr. Ani's testimony.

While SCS therapy use does not require a psychological/behavioral evaluation and the Medtronic Information for Prescribers manual does not mention psychological evaluation, many payers require a patient to receive a psychological evaluation to assess fitness for implantable device therapy and to identify contributing factors related to pain symptoms.

Psychological evaluations and any related behavioral health recommendations are an important tool for payers to use if the service is covered and included in a payer benefit package. We recommend if the Committee requires psychological evaluation as a precondition for SCS therapy, that the benefit package is reviewed to ensure coverage for the required psychological evaluation and that they are paid by workers' compensation carriers.

The appropriateness of psychological evaluations is addressed in the NACC recommendations as being important to appropriate patient selection, and to address any preexisting psychological factors that may influence SCS effectiveness:

Some have questioned the appropriateness of implanting patients with active litigation, worker's compensation claims, or obvious secondary gain (138,139). The NACC recommends this be addressed during the psychological assessment and, if any contraindications are documented, further discussions should occur (140). ... The NACC recommends a

psychological evaluation within less than one year before implementing any neuromodulation therapies (84,85).

In general, the literature recommends psychological assessment prior to implanting SCS therapy. The assessment should use standardized measures including mental health, social risk factors, and pain therapy expectations. Most of the published evidence associates preexisting psychosocial pathology with reduced SCS efficacy.⁵⁵ However, some reports find no association between SCS efficacy and preexisting psychosocial risks.⁵⁶ Others note that patient expectations, which can be explored within the psychological evaluation process, can be important indicators for a successful outcome.⁵⁷ In general, studies found presurgical somatization, depression, anxiety, and poor coping were useful in predicting poor response. However, Doleys stated that “the relationship between psychological factors, pain reduction, and improved function and QOL is highly variable and improvement in one area may not be associated with improvement in others.”⁵⁸ There are additional articles that also mention the presence of psychological evaluations as a component in the success of SCS therapy that can provide further details.^{59–76}

Recent evidence also supports the appropriate use of psychological therapy to address pain, opioid use, and depression amongst post-surgical patients, finding acceptance and commitment therapy was associated with reductions in pain, pain interference, pain catastrophizing, anxiety, opioid use, and depressed mood compared with patients in the group receiving no therapy.² Availability of behavioral health services after implant may help to achieve better outcomes and a reduction in opioid utilization when compared to patients without access to this treatment.

Thank you again for the opportunity to testify and to provide additional evidence to further refine the Committee’s recommendations. We believe that the literature supports providing workers’ compensation patients access to SCS based upon appropriate patient selection. This mirrors the coverage by other payers, and best addresses reducing pain, increasing function, and improving quality of life for eligible patients.

Please contact me if you have any questions.

Sincerely,



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Appendix A: Recommended SAIF Coding Correction

The current SAIF claims analysis incorrectly includes patients who are not receiving long-term SCS therapy. This results in an incorrect assessment of long-term costs, procedural follow-up, and outcome attribution.

To understand the error in patient identification in the study and the related coding corrections, an understanding of the timeframe of a typical SCS patient and the associated procedures and CPT codes will be helpful.

First, an SCS patient typically receives a “trial” or “test stimulation”. This allows the patient and clinician to assess that SCS does indeed meet the goal of reducing pain, increasing function, and improving the patient quality-of-life. It also helps to ensure that a patient has appropriate expectations that it will improve one or more of those outcomes by 50%, but will not “cure” the pain. The trial is identified by CPT 63650 or CPT 63655.^b Trial stimulation allows the patient, payer, and provider to ensure that the expense of an SCS generator system is only incurred for patients who will benefit the most from the therapy.

If the test stimulation is successful, a patient will then receive a permanent system implant, consisting of a generator implant and one or more leads. This is where a patient is typically considered to be receiving SCS therapy, as the clinical studies and benefits have been shown for the permanent implant. The generator is identified by CPT 63685 and the leads are identified by CPT 63650 or CPT 63655. Patients are typically considered to be receiving the full benefits of SCS therapy when they receive a generator implant. Patients who do not receive the generator are generally not considered to be SCS patients after the removal of the temporary trial leads.

When looking at SCS patients in the claims data, it is helpful to separate patients into those with a successful trial (i.e. those that go on to receive a permanent generator implant) and an unsuccessful trial, particularly when looking at long-term impact of the therapy. Examining the cost and outcomes of these patients separately will help to understand the impact of the therapy on those with successful and unsuccessful trials. There are published claims analyses that also use this methodology to identify successful SCS implants that can be used as an example for this type of claims analysis, and are summarized in the section about economic evidence below.

We recommend the following groupings be used by SAIF to accurately assess the SCS patient population.

Group: SCS Trial only; not receiving SCS therapy

Criteria and Notes: Payment Year >= 2010

Surgery Service Codes: 63650, 63655

NO evidence of: 63685

Should not be any evidence of 63660, 63663, 63664, 63688, 63661, or 63662, as those codes are only used for permanent implant revision, removal, or replacement.

^b Medtronic leads are approved for test stimulation using CPT 63650, though other manufacturers may have labeling allowing for test stimulation with a lead that is implanted using CPT 63655.

Group: SCS Generator; receiving SCS therapy. Recommend use this group to examine long-term impact of SCS therapy

Criteria and Notes:

Payment Year >= 2010

Surgery Service Codes: 63685

Note: for initial implants and not replacements, the claims will show presence of (63650, 63655) on or before same date of service for (63685)

Revision Service Codes: 63663, 63664

Removal Service Codes: 63661, 63662, 63688

Note: AMA created four new CPT codes specific to revision, replacement, or removal of both percutaneous and surgical leads. The new 2010 CPT codes (63661-63664) are more specific; replacing CPT 63660. CPT 63660 should not have been billed after 1/1/2010, so has been removed from the recommended codes here.

Appendix B: Search Strategy

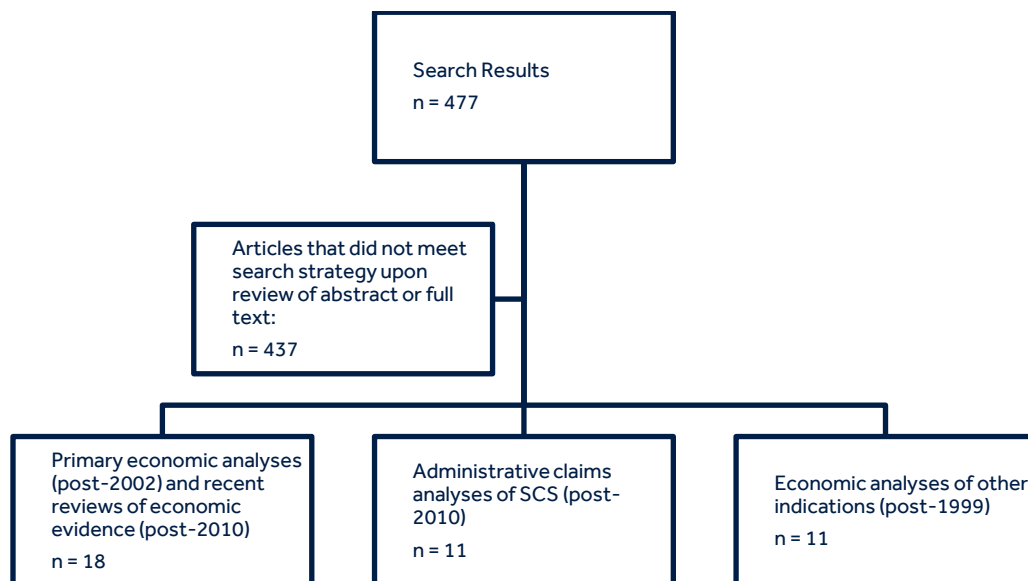
A search was performed in PubMed on June 10, 2017 using the following search strategy. Articles were selected if they were a primary economic evaluation of SCS for chronic pain. Review articles were examined for additional studies that may be missing from the original search.

Articles were divided into three different categories:

- A. Articles that are primary economic analyses and recent reviews of primary economic analyses, including cost-effectiveness, cost-utility, and cost-benefit for SCS for chronic intractable pain of the trunk and/or limbs. Indications were selected for on-label use of SCS.
- B. Articles that leverage administrative claims data to provide a descriptive analysis of a research question of interest to payers, hospitals, or the healthcare system.
- C. Articles that are primary economic analyses such as that in (A) above, but for which the indication under investigation is not on-label for use of SCS in the US. We do not advocate for use of SCS in this population, however the Committee expressly asked about the use of SCS in these populations. These studies are not summarized here, but citations are provided for reference for the Committee's own investigation and review.^c

Search strategy:

(((((cost OR costs)) OR (CMS OR HCFA OR Medicare)) OR (cost-effective* OR cost effective* OR cost saving OR cost-saving OR cost-benefit OR cost utility OR cost-utilities)) OR (cost analysis OR cost analyses OR economic OR economics OR cost consequence OR cost-consequence)) AND (((((((spine OR spinal OR spines)) OR spinal cord) AND electric stimulation therapy) OR spinal cord stimulat*) OR dorsal cord stimulat*) OR neurostimulat*))



^c Medtronic does not market its products for off-label uses, and makes no representations or comment regarding its safety or efficacy.

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Reference List

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