



AAVBC

AMERICAN ACADEMY OF VALUE BASED CARE

Multiple Sclerosis Quick Reference Guide

2026

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1 CLINICAL SNAPSHOT

Definition: **Multiple sclerosis (MS)** is a chronic, immune-mediated inflammatory and neurodegenerative disease of the central nervous system in which autoreactive T and B cells breach the blood-brain barrier and **drive demyelination, axonal loss, and astrocytic gliosis**.^{1,2} It is the leading non-traumatic cause of neurological disability in young and middle-aged adults.¹ Four standardized phenotypes are recognized: **clinically isolated syndrome (CIS)**, **relapsing-remitting MS (RRMS)**, the most common form), **primary progressive MS (PPMS)**, and **secondary progressive MS (SPMS)**, each modified by descriptors for activity (clinical relapses or MRI activity) and progression (disability worsening independent of relapses).^{1,3}

ICD-10 Codes:

MS is reported with **phenotype- and activity-specific subcodes**. **G35** is the multiple sclerosis category, now subdivided into **G35.A** (RRMS), **G35.B0/B1/B2** (PPMS: unspecified/active/ non-active), **G35.C0/C1/C2** (SPMS: unspecified/active/ non-active), and **G35.D** (MS, unspecified). **Activity status** (active = recent clinical relapse, new MRI lesions, or documented progression; non-active = clinically and radiologically stable) **must be documented** to support the active-vs-non-active subcodes.⁴ Commonly co-occurring manifestations are **coded separately**: **H46.1-** (retrobulbar/optic neuritis, specify laterality), **G37.3** (acute transverse myelitis in demyelinating disease), **N31.-** (neurogenic bladder), **R13.1-** (dysphagia), **R26.-** (gait abnormality), **G31.84** (mild cognitive impairment), **F32.-/F33.-** (depressive disorder), **R53.83** (fatigue), and **R25.2/M62.83** (spasm/muscle spasm).⁴ Do **not** code **G12.21** (amyotrophic lateral sclerosis; ALS) for MS **unless ALS is independently diagnosed**.

Prevalence and Burden: MS affects an estimated nearly **1 million** adults in the United States, with a female-to-male ratio of approximately **3:1**.^{1,5} Within the United States, prevalence increases significantly with latitude ($r = 0.82$) and ranges from ~161 per 100,000 in Hispanic populations to ~375 per 100,000 in White populations.^{1,6} Although onset typically occurs between ages **20 and 40**, life expectancy is estimated at approximately 74–76 years (7–9 years shorter than the general population) and MS prevalence in Medicare beneficiaries ≥ 65 was 243 per 100,000 in 2021, increasing 15.5% over the prior decade.^{1,7,8} The total per-person economic burden averages approximately **\$88,000 per year** (2019 dollars), with direct medical costs of **~\$65,600 per year**.⁹

HCC/RAF V28 Mapping

ICD-10 CODE(S) ¹⁰	HCC CATEGORY (V28) ¹⁰	RAF (CNA) ¹¹	DOCUMENTATION REQUIREMENT ⁴
G35.A Relapsing-remitting multiple sclerosis	HCC 198 Multiple Sclerosis	0.647	Document relapsing-remitting multiple sclerosis (RRMS) ; include relapse history, current disease activity, MRI findings when available, and disease-modifying therapy

ICD-10 CODE(S) ¹⁰	HCC CATEGORY (V28) ¹⁰	RAF (CNA) ¹¹	DOCUMENTATION REQUIREMENT ⁴
G35.B1 Primary progressive multiple sclerosis, active/G35.C1 Secondary progressive multiple sclerosis, active	HCC 198 Multiple Sclerosis	0.647	Specify active PPMS or active SPMS ; document evidence of activity (clinical relapse, new/enlarging MRI lesion, or progression within the past year)
G35.B2 Primary progressive multiple sclerosis, non-active/G35.C2 Secondary progressive multiple sclerosis, non-active	HCC 198 Multiple Sclerosis	0.647	Specify non-active PPMS or non-active SPMS ; document absence of relapses and new MRI activity while describing ongoing disability or progression status
G35.D Multiple sclerosis, unspecified	HCC 198 Multiple Sclerosis	0.647	Use ONLY when MS subtype cannot be determined ; whenever possible, document RRMS, PPMS, or SPMS to support diagnostic specificity
H46.1- Optic neuritis	No HCC	—	Document laterality and relationship to demyelinating disease ; record as a clinically confirmed demyelinating event
G37.3 Acute transverse myelitis in demyelinating disease of central nervous system	No HCC	—	Document: neurologic deficits, spinal cord involvement, MRI findings, and association with demyelinating disease
N31.- Neurogenic bladder	No HCC	—	Document neurogenic bladder attributable to MS ; include symptoms, catheterization requirements, and treatment plan when applicable.

ABBREVIATIONS: CNA = Community Non-Dual Eligible, Aged segment; CMS = Centers for Medicare & Medicaid Services; HCC = Hierarchical Condition Category; ICD-10 = International Classification of Diseases, 10th Revision; ICD-10-CM = International Classification of Diseases, 10th Revision, Clinical Modification; MA = Medicare Advantage; MEAT = Monitor, Evaluate, Assess, Treat; MRI = magnetic resonance imaging; MS = multiple sclerosis; PPMS = primary progressive multiple sclerosis; RAF = Risk Adjustment Factor; RRMS = relapsing-remitting multiple sclerosis; SPMS = secondary progressive multiple sclerosis; V28 = CMS Hierarchical Condition Category Model, Version 28RAF values represent the Community Non-Dual Eligible Aged (CNA) coefficient from the 2026 CMS-HCC model;¹¹ values vary across patient populations based on eligibility and care setting

RAF values represent the Community Non-Dual Eligible Aged (CNA) coefficient from the 2026 CMS-HCC model; values vary across patient populations based on eligibility and care setting

Risk-Adjusted Care Resources per Patient/Year^{10,11}

Risk-adjusted care resource allocation — MA base rate (\$10,402.34) × RAF coefficient

MULTIPLE SCLEROSIS**\$6.7K**

HCC 198 · RAF 0.647

RAF values represent the Community Non-Dual Eligible Aged (CNA) coefficient from the 2026 CMS-HCC model; values vary across patient populations based on eligibility and care setting

**AAVBC PERSPECTIVE**

***From the AAVBC's perspective,** value-based care in MS begins at the point of first clinical suspicion: reducing diagnostic delay is the single highest-yield action a PCP can take. Delays remain common, are frequently physician-dependent, and are associated with greater disability at diagnosis.¹² Treatment initiation within 6 months of the first demyelinating event is associated with a lower risk of reaching disability milestones compared with later starts.¹³*

The PCP's role follows a simple sequence:

***ORDER MRI FIRST, NOT LATER.** When a patient presents with optic neuritis, limb numbness evolving over days, new gait instability, or unexplained bladder dysfunction, order brain and spinal cord MRI with contrast rather than waiting for a second attack.¹⁴*

*Then **REFER PROMPTLY**; the 2024 McDonald Criteria now allow **earlier diagnosis** by recognizing the optic nerve as a **fifth dissemination-in-space site**, accepting **radiologically isolated syndrome as diagnosable**, and no longer requiring dissemination in time when **lesions span four or more locations**.¹⁵ Every year of delayed diagnosis is a year of **untreated neurodegeneration**; axonal damage begins at the earliest stages, and early high-efficacy therapy may lower the long-term risk of conversion to **secondary progressive MS**.^{1,13}*

2 RECOGNITION AND DIAGNOSIS

There is no USPSTF recommendation or population-based screening program for multiple sclerosis in asymptomatic adults; MS has no validated presymptomatic screening test.^{5,16} All diagnostic evaluation is **symptom-triggered**, and all surveillance testing applies only to patients with an **established MS diagnosis**. Medicare Part B covers the following diagnostic and surveillance tests:

Diagnostic and Surveillance Tests Covered Under Medicare Part B (Diagnosed MS Population)

TEST	FREQUENCY	CPT/ HCPCS	CLINICAL INDICATION
MRI brain without and with contrast	At diagnosis ; ^{17,18} new baseline 3-6 mo after DMT start/switch; then annually on DMT	70553	DIS/DIT per 2024 McDonald Criteria; annual lesion surveillance ^{17,18}
MRI brain without contrast	Follow-up surveillance when contrast not indicated	70551	Routine surveillance once stable baseline established and contrast not required ^{17,18}
MRI cervical/thoracic spine ± contrast	At diagnosis ; when clinically indicated ¹⁷	72156/ 72157	Spinal cord lesion evaluation ; suspected DIS; partial myelitis ^{15,18}
Lumbar puncture/CSF analysis	Once at diagnosis when MRI is non-diagnostic ^{15,19}	62270	OCBs or kappa free light chains ; CSF-specific OCBs substitute for DIT under 2024 criteria ^{15,19,20}
Visual evoked potentials	When optic nerve involvement is in question ²¹	95930	Optic-nerve lesion documentation ; optic nerve = fifth DIS site under 2024 McDonald Criteria ^{15,21}
Depression screening (PHQ-2/PHQ-9)	Annually and when clinically indicated	G0444	Depression affects 21-50% of MS patients; AAN recommends routine screening ²²
Cognitive assessment/ care planning‡	Annually ; SDMT preferred over MMSE ²³	99483	SDMT screens processing-speed impairment ; MMSE is insensitive in MS ²³
Physical/occupational therapy§	Per functional need ²⁴	97110– 97542	Maintenance rehabilitation for gait, balance, and fall prevention ²⁴
Advance Care Planning (during AWV)†	Annually + when goals change	99497/ 99498	Document directives, surrogate, and goals ; relevant in progressive MS with significant disability

ABBREVIATIONS: AAN = American Academy of Neurology; AWV = Annual Wellness Visit; CPT/HCPCS = Current Procedural Terminology/Healthcare Common Procedure Coding System; CSF = cerebrospinal fluid; DIS = dissemination in space; DIT = dissemination in time; DMT = disease-modifying therapy; MMSE = Mini-Mental State Examination; MRI = magnetic resonance imaging; MS = multiple sclerosis; OCB = oligoclonal band; PHQ = Patient Health Questionnaire; SDMT = Symbol Digit Modalities Test

Subtle Early Signs in Older Adults

SIGN/SYMPTOM	CLINICAL SIGNIFICANCE
Subacute monocular vision loss or painful eye movement (optic neuritis)	Classic demyelinating presentation; in older adults do not dismiss as cataract or ischemic optic neuropathy without considering MS → order MRI and refer ^{14,18}
New limb numbness, tingling, or a sensory 'band' developing over days	Partial myelitis pattern; sensory symptoms evolving over days (not seconds-to-minutes like stroke) warrant MRI rather than a wait-and-see approach ¹
Disabling fatigue out of proportion to activity	Affects roughly 80% of people with MS; in older adults it is often misattributed to aging or depression rather than evaluated as an MS symptom ²⁵
New gait instability, ataxia, or unexplained falls	May reflect cerebellar or spinal cord involvement; in patients >65 this is frequently attributed to deconditioning, masking progressive MS ²⁶
Heat-triggered transient worsening (Uhthoff phenomenon)	Symptom worsening with fever, infection, or heat reflects conduction slowing, not new inflammation = a pseudoexacerbation; do not reflexively give steroids ^{27,28}
Progressive cognitive slowing (processing speed, memory)	Cognitive impairment affects 40-70% of people with MS and is poorly captured by the MMSE ; use the SDMT and code G31.84 when present ^{23,29}
New or worsening bladder urgency, frequency, or retention	Neurogenic bladder is common , under-documented, and a driver of UTIs and ED visits; code N31.- and address proactively ^{30,31}
Insidious, steadily progressive weakness without discrete relapses	Suggests a progressive phenotype (PPMS or SPMS) or PIRA ; reassess the phenotype rather than assuming stable RRMS ³²

ABBREVIATIONS: ED = emergency department; MMSE = Mini-Mental State Examination; MRI = magnetic resonance imaging; MS = multiple sclerosis; PIRA = progression independent of relapse activity; PPMS = primary progressive multiple sclerosis; RRMS = relapsing-remitting multiple sclerosis; SDMT = Symbol Digit Modalities Test; SPMS = secondary progressive multiple sclerosis; UTI = urinary tract infection



CLINICAL PEARL: MULTIPLE SCLEROSIS AND EBV

Epstein-Barr Virus (EBV) seroconversion is present in **virtually all MS patients** and **increases MS risk 32-fold**, yet >95% of adults are EBV-seropositive and **only ~0.1-0.2%** develop MS.³³⁻³⁵ **EBV is necessary but not sufficient:** disease requires additional genetic susceptibility (especially **HLA-DRB115:01**),³⁶ low vitamin D, smoking, or other cofactors. EBV seronegativity effectively **rules out MS** in the differential.

Geriatric Risk Factors

FACTOR	RISK SIGNAL	NOTES
Epstein-Barr virus infection	RR 2.17 (95% CI 1.97–2.39); 32-fold risk after EBV seroconversion ^{34,35}	The dominant infectious driver ; near-universal EBV seropositivity means it is necessary but not sufficient for MS ³⁷
HLA-DRB1*15:01 haplotype	OR ~ 3.0 (strongest single genetic effect) ³⁸	More than 200 risk variants identified ; most involve immune-pathway genes ³⁶
Family history (first-degree relative)	2–4% lifetime risk vs ~0.1% general ; twin concordance 30–50% ²	No validated genetic factor reliably predicts clinical course ²
Female sex	~ 3:1 female-to-male ratio ⁶	Consistent across populations ; male patients with demyelinating symptoms still warrant full workup ²
Cigarette smoking	RR 1.48 (meta-analysis) ¹	Also accelerates disability progression and SPMS conversion ; the most actionable modifiable risk factor ³⁹
Higher latitude/low vitamin D	Prevalence gradient (5–300 per 100,000) ^{1,38}	Vitamin D supplementation has not been shown in trials to improve MS outcomes ⁴⁰
Adolescent obesity	HR 1.58 for BMI >95th percentile at age 13 ¹	Interacts synergistically with HLA-DRB1*15:01, smoking, and EBV ⁴¹
Older age at onset (≥50 y)	Faster disability accumulation ; more progressive phenotype ⁴²	Late-onset MS reaches EDSS milestones faster ; stricter MRI thresholds apply at ≥50 due to vascular mimics ⁴³
Vascular comorbidity at diagnosis	HR 1.51 (95% CI 1.41–1.61) for ambulation disability ^{1,44}	Reduces median time to a walking aid from 18.8 to 12.8 years ; the most validated modifier of outcome in older patients ⁴⁴
ABBREVIATIONS: BMI = body mass index; CI = confidence interval; EBV = Epstein-Barr virus; EDSS = Expanded Disability Status Scale; HLA = human leukocyte antigen; HR = hazard ratio; MRI = magnetic resonance imaging; MS = multiple sclerosis; OR = odds ratio; RR = relative risk; SPMS = secondary progressive multiple sclerosis		

Diagnostic Thresholds

MS diagnosis and ongoing classification rely on **two primary frameworks in US clinical practice**: the **2024 McDonald Criteria** (published 2025), which establish the initial diagnosis, and the **Lublin Phenotype Classification** (2013, clarified 2020), which categorizes the clinical course and drives ICD-10 subcode selection, DMT eligibility, and surveillance planning.^{3,15} Diagnosis hinges on demonstrating that demyelinating lesions are **disseminated in space (DIS)** across characteristic CNS locations and **disseminated in time (DIT)**, with alternative biomarker pathways (CSF, CVS, PRLs) now available when conventional MRI evidence is insufficient.¹⁵ Once

diagnosed, the clinical course is classified by **phenotype** (RRMS, PPMS, SPMS) with annual activity and progression modifiers, and disability is tracked **longitudinally using the EDSS**.^{3,45}

Primary Diagnostic System: 2024 McDonald Criteria

The **2024 McDonald Criteria** provide a unified diagnostic framework for all MS presentations: relapsing, progressive, pediatric, and late-onset.¹⁵ The diagnosis requires **DIS across five anatomical locations** (periventricular, juxtacortical/cortical, infratentorial, spinal cord, and now the optic nerve as a new fifth site) plus evidence of DIT or supportive biomarkers.^{15,21}

Key changes from 2017 include: DIT/CSF is no longer mandatory if lesions are present in ≥ 4 of 5 locations; the central vein sign (**CVS**) and paramagnetic rim lesions (**PRLs**) serve as **optional high-specificity MRI biomarkers**; kappa free light chains can substitute for oligoclonal bands; and radiologically isolated syndrome (**RIS**) can now fulfill MS criteria **when supported by biomarker evidence**.^{14,15} **Stricter thresholds apply for patients ≥ 50 years**, those with vascular comorbidities, and children **to reduce misdiagnosis risk**.^{15,46}

2024 McDonald Criteria

PRESENTATION ¹⁵	ANATOMICAL LOCATIONS INVOLVED ¹⁵	REQUIREMENTS TO ESTABLISH DIAGNOSIS ¹⁵
Attack or ≥ 1 year of progression	≥ 2	DIT or CSF+ or CVS+ or lesions in 4/5 anatomical locations
≥ 1 year of progression (PPMS pathway)	≥ 2 (including spinal cord lesions)	DIT or CSF+ or CVS+ or lesions in 4/5 anatomical locations
Attack or ≥ 1 year of progression	1	CSF+ and CVS+, or CSF+ and PRL+, or DIT and CVS+, or DIT and PRL+
Incidental imaging or symptoms not specific for MS	≥ 2	DIT or CSF+ or CVS+

ABBREVIATIONS: CSF+ = cerebrospinal fluid positive (oligoclonal bands or elevated kappa free light chains); CVS+ = central vein sign positive; DIT = dissemination in time; MS = multiple sclerosis; PPMS = primary progressive multiple sclerosis; PRL+ = paramagnetic rim lesion positive

Primary Classification System: Lublin Phenotype Descriptors (2013/2020)

Once MS is diagnosed, the clinical course is classified using the **Lublin phenotype system**, which defines four core phenotypes (**CIS**, **RRMS**, **PPMS**, and **SPMS**) that are each modified by **activity** (clinical relapses or new/enlarging MRI lesions) and **progression** (gradual disability worsening independent of relapses).^{3,47} These modifiers must be reassessed **at least annually** and are framed in time (e.g., "SPMS, active and progressing over the past 12 months").^{3,47} The phenotype directly determines the **ICD-10-CM subcode**, **DMT eligibility**, and **surveillance intensity**.

PHENOTYPE	ACTIVITY MODIFIER	ICD-10-CM CODE	DMT ELIGIBILITY*
Relapsing-remitting MS (RRMS)	Active or non-active	G35.A	All approved relapsing-forms DMTs
Primary progressive MS (PPMS)	Active, with or without progression	G35.B1 (active)	Ocrelizumab (only FDA-approved DMT for PPMS)
Primary progressive MS (PPMS)	Non-active, with or without progression	G35.B2 (non-active)	Ocrelizumab
Secondary progressive MS (SPMS)	Active, with or without progression	G35.C1 (active)	Siponimod, cladribine, ocrelizumab (relapsing-forms indication)
Secondary progressive MS (SPMS)	Non-active, with or without progression	G35.C2 (non-active)	Limited options ; no DMT with strong evidence for non-active SPMS
MS, unspecified	—	G35.D	Use only when subtype is genuinely undetermined ; overuse = common MS coding error

ABBREVIATIONS: DMT = disease-modifying therapy; FDA = Food and Drug Administration; ICD-10-CM = International Classification of Diseases, 10th Revision, Clinical Modification; MS = multiple sclerosis; PPMS = primary progressive multiple sclerosis; RRMS = relapsing-remitting multiple sclerosis; SPMS = secondary progressive multiple sclerosis

***Consult FDA labels for the most up-to-date dosage information, contraindications, and drug-drug interactions**

Primary Disability Scale: Expanded Disability Status Scale (EDSS)

The **EDSS** is the most widely used measure of **MS-related disability**, ranging from **0** (normal neurologic exam) to **10** (death due to MS) in 0.5-point increments.^{48,49} It is scored by a neurologist based on examination of **8 functional systems**. Key clinical milestones are **EDSS 3.0** (moderate disability, fully ambulatory), **4.0** (significant disability, walks ≥ 500 m unaided), and **6.0** (requires unilateral walking aid for ~ 100 m).^{50,51} A sustained 1.0-point increase (or 0.5-point at EDSS ≥ 6.0) **confirmed over 3-6 months** defines confirmed **disability progression**.⁵¹ Known limitations to the EDSS include poor inter-rater reliability, heavy weighting toward ambulation at scores ≥ 4.0 , and poor capture of cognitive and upper-limb function.

Simplified EDSS Summary Table (Adapted from Kurtzke, 1983)⁴⁸

EDSS SCORE	FUNCTIONAL MEANING	CLINICAL SIGNIFICANCE
0	Normal neurologic exam	Baseline reference
1.0-1.5	No disability, minimal signs in one functional system	Subclinical findings only

EDSS SCORE	FUNCTIONAL MEANING	CLINICAL SIGNIFICANCE
2.0-2.5	Minimal disability in 1-2 functional systems	Fully ambulatory; may have mild sensory or visual findings
3	Moderate disability, fully ambulatory	First milestone: disability present but no walking limitation
4	Significant disability, walks ≥ 500 m without aid or rest	Second milestone: key threshold for DMT escalation discussions
6	Requires unilateral walking aid for ~ 100 m	Third milestone: major functional transition; triggers assistive device and fall-prevention planning
7.0-7.5	Restricted to wheelchair; transfers independently or with aid	Caregiver support typically required
8.0-9.5	Bed-bound to helpless	Advance care planning critical
10	Death due to MS	—

ABBREVIATIONS: DMT = disease-modifying therapy; EDSS = Expanded Disability Status Scale; MS = multiple sclerosis

Other Relevant Diagnostic and Monitoring Tools

SYSTEM/TEST	BASIS	KEY FEATURES	PRIMARY USE
Symbol Digit Modalities Test (SDMT)^{23,29}	Timed symbol-to-number matching task (~ 5 min)	Most sensitive single test for MS cognitive impairment ; a 4-point decline is clinically meaningful (associated with employment loss); 8-point decline proposed as reliable threshold for cognitive worsening	Annual cognitive screening ; recommended by AAN and BICAMS consensus as standard longitudinal outcome
MRI surveillance (T2 lesion threshold)⁵²	Annual brain MRI comparing new T2 lesions to treated baseline	≥ 2 new T2 lesions independently predict ~ 3-fold relapse risk and support DMT escalation ; 1 new T2 lesion did not significantly increase risk; rebaseline MRI 3-6 months after DMT initiation recommended	Treatment response monitoring ; DMT escalation decision-making
Central vein sign (CVS)¹⁵	Susceptibility-sensitive MRI (T2*-weighted)	Perivenular demyelination marker ; positive when ≥ 6 lesions show CVS or majority if 10 lesions ; 94% accuracy distinguishing MS from mimics at 3T	Diagnostic specificity, especially in patients ≥ 50 or with vascular comorbidities

SYSTEM/ TEST	BASIS	KEY FEATURES	PRIMARY USE
Paramagnetic rim lesions (PRLs) ¹⁵	Susceptibility-sensitive MRI	Iron-laden microglia rim = chronic active ("smoldering") lesion ; ≥ 1 PRL is $>95\%$ specific for MS; present in 48% of CIS, 59% of RRMS	Diagnostic specificity and prognostic marker for aggressive disease
CSF analysis (OCBs/kappa free light chains) ¹⁵	Lumbar puncture	CSF-specific OCBs present in 80–90% of MS; kappa free light chains now accepted as OCB substitute under 2024 criteria	Supports DIT when MRI is non-diagnostic ; differentiates MS from NMOSD and MOGAD
Radiologically isolated syndrome (RIS) ^{15,53}	Incidental MRI findings meeting DIS criteria without clinical symptoms	~50% develop clinical MS within 10 years ; risk factors: age 35, male sex, spinal cord lesions, OCBs	Now eligible for MS diagnosis under 2024 criteria if DIS + DIT/CSF/ CVS are satisfied ; early intervention may delay first clinical attack

ABBREVIATIONS: AAN = American Academy of Neurology; BICAMS = Brief International Cognitive Assessment for Multiple Sclerosis; CIS = clinically isolated syndrome; CSF = cerebrospinal fluid; CVS = central vein sign; DIS = dissemination in space; DIT = dissemination in time; DMT = disease-modifying therapy; MOGAD = myelin oligodendrocyte glycoprotein antibody-associated disease; MRI = magnetic resonance imaging; MS = multiple sclerosis; NMOSD = neuromyelitis optica spectrum disorder; OCB = oligoclonal band; PRL = paramagnetic rim lesion; RIS = radiologically isolated syndrome; RRMS = relapsing-remitting multiple sclerosis; SDMT = Symbol Digit Modalities Test

Clues to Dig Deeper

CLINICAL CLUE	WHY IT MATTERS	NEXT DIAGNOSTIC STEP
Demyelinating symptoms evolving over days in any adult	Opportunity to shorten diagnostic delay rather than 'wait and see' ⁵⁴	Order brain and spinal cord MRI (ideally 3T) and refer to neurology promptly ⁵⁵
Optic neuritis or partial myelitis	Classic first demyelinating events ; early treatment improves long-term outcomes ¹⁸	MRI brain and spine with contrast ; neurology referral; consider CSF if MRI non-diagnostic ¹⁵

CLINICAL CLUE	WHY IT MATTERS	NEXT DIAGNOSTIC STEP
Incidental MRI white-matter lesions (possible RIS)	RIS can meet MS criteria and may warrant early intervention before the first clinical attack ^{53,56}	Compare with prior imaging ; refer to neurology; do not label as MS on imaging alone ¹⁷
Worsening gait or function without a discrete relapse	May signal SPMS transition or PIRA rather than stable RRMS ³²	Neurology reassessment of phenotype and treatment plan; surveillance MRI ^{1,45}
New progressive deficit on natalizumab	New cognitive, visual, or motor changes raise concern for PML → medical emergency ⁵⁷	Emergent brain MRI with DWI and CSF JCV PCR ; urgent neurology contact ⁵⁷
Disabling fatigue, mood change, or cognitive slowing	These non-physical symptoms are under-recognized yet central to function and adherence ^{1,29}	PHQ-9 and SDMT screening ; code G31.84/F32.- when present; address before DMT changes ^{22,23}
Sudden worsening with fever or heat	Distinguishing a true relapse from a pseudoexacerbation prevents unnecessary steroids ¹	Check for infection and manage temperature first; reassess once afebrile ²⁸

ABBREVIATIONS: CSF = cerebrospinal fluid; DMT = disease-modifying therapy; DWI = diffusion-weighted imaging; JCV = John Cunningham virus; MRI = magnetic resonance imaging; MS = multiple sclerosis; PCR = polymerase chain reaction; PHQ-9 = Patient Health Questionnaire-9; PIRA = progression independent of relapse activity; PML = progressive multifocal leukoencephalopathy; RIS = radiologically isolated syndrome; RRMS = relapsing-remitting multiple sclerosis; SDMT = Symbol Digit Modalities Test; SPMS = secondary progressive multiple sclerosis

Common Oversights

OVERSIGHT/SHORTCUT	WHY IT MATTERS — WHAT TO DO INSTEAD
Over-reading nonspecific MRI 'white spots' as MS	Age-related small-vessel ischemia and migraine lesions are common in older adults; interpret MRI in clinical context and apply stricter thresholds at age ≥ 50 ^{58,59}
Treating sensory symptoms alone as a relapse	Subjective numbness without objective exam findings should not by itself satisfy a demyelinating attack; document the objective neurological exam ^{1,59}
Diagnosing MS after a single event without proving dissemination in time	Confirm a second lesion on follow-up MRI, CSF-specific OCBs, or a true second relapse before committing to the diagnosis ^{15,59}
Misinterpreting JCV testing	Blood JCV PCR is typically negative and does not exclude risk; use serum JCV antibody index for PML risk stratification on natalizumab ^{54,60}

OVERSIGHT/SHORTCUT	WHY IT MATTERS — WHAT TO DO INSTEAD
Treating MS as 'set it and forget it'	Irreversible atrophy and smoldering progression continue between relapses; the PCP must manage vascular risk and monitor function even when DMTs are specialist-managed ^{1,61}
Giving steroids for every symptom flare	Rule out pseudoexacerbation (infection, fever, Uhthoff phenomenon) before steroids; check for infection and manage temperature first ⁶²
Denying maintenance rehabilitation for 'lack of restoration potential'	Maintenance PT/OT/speech therapy to prevent functional decline is a recognized Medicare benefit ²⁴
ABBREVIATIONS: CSF = cerebrospinal fluid; DMT = disease-modifying therapy; JCV = John Cunningham virus; MRI = magnetic resonance imaging; MS = multiple sclerosis; OCB = oligoclonal band; OT = occupational therapy; PCP = primary care provider; PCR = polymerase chain reaction; PML = progressive multifocal leukoencephalopathy; PT = physical therapy	

Key Differentials in Elderly

PRESENTATION	DIFFERENTIAL	KEY TESTS
First demyelinating event in a patient ≥50	MS; small-vessel ischemic white-matter disease; migraine-related lesions; vitamin B12 deficiency; NMOSD; MOGAD ⁵⁸	MRI brain and spine with contrast; B12/methylmalonic acid; AQP4-IgG and MOG-IgG; vascular risk assessment ^{15,63}
Acute bilateral or severe vision loss	Neuromyelitis optica spectrum disorder (NMOSD) rather than MS; MOGAD; ischemic optic neuropathy ^{58,63}	AQP4-IgG serology; MOG-IgG; urgent MRI orbits/brain; neurology referral ⁶⁴
Longitudinally extensive transverse myelitis	NMOSD (lesions spanning ≥3 vertebral segments); MOGAD; MS (usually short-segment); compressive or vascular myelopathy ⁶³	Spinal MRI; AQP4-IgG; MOG-IgG; CSF analysis ⁶⁴
Progressive cognitive or behavioral decline	Smoldering MS/PIRA; vascular cognitive impairment; neurodegenerative dementia; depression ²⁹	SDMT; brain MRI; depression screen; vascular risk review ^{1,29}
Steadily progressive weakness, no relapses	PPMS/SPMS; cervical spondylotic myelopathy; ALS (do not code G35-MS as G12.21); hereditary spastic paraplegia ⁵⁸	MRI brain and spine; clinical phenotyping; neurology referral ¹⁵
Symptom worsening with fever or heat	Pseudoexacerbation (Uhthoff phenomenon) vs true relapse; intercurrent infection ²⁸	Evaluate for infection; recheck after temperature normalizes; reserve steroids for confirmed relapse ^{1,62}

PRESENTATION	DIFFERENTIAL	KEY TESTS
ABBREVIATIONS: ALS = amyotrophic lateral sclerosis; AQP4-IgG = aquaporin-4 immunoglobulin G; CSF = cerebrospinal fluid; MOG-IgG = myelin oligodendrocyte glycoprotein immunoglobulin G; MOGAD = myelin oligodendrocyte glycoprotein antibody-associated disease; MRI = magnetic resonance imaging; MS = multiple sclerosis; NMOSD = neuromyelitis optica spectrum disorder; PIRA = progression independent of relapse activity; PPMS = primary progressive multiple sclerosis; SDMT = Symbol Digit Modalities Test; SPMS = secondary progressive multiple sclerosis		

Comorbidity Screening

CONDITION	PREVALENCE/ASSOCIATION	SCREENING APPROACH
Vascular disease (I10, E11.-, E78.-)	Vascular comorbidity at diagnosis carries HR 1.51 for ambulation disability and 1.5x higher CV mortality ^{1,65}	Aggressive control of hypertension, diabetes, and hyperlipidemia; smoking cessation slows brain volume loss ^{62,66}
Depression/anxiety (F32.-, F41.-)	Affects 21-50% of people with MS = 2-3x the general population ^{1,67}	Annual PHQ-9 or BDI (BDI cutoff ≥ 13); address before DMT changes to support adherence ⁶⁸
Cognitive impairment (G31.84)	Affects 40-70% of people with MS; processing speed, memory, executive function ^{1,29}	Use SDMT, not MMSE; document and code; offer cognitive rehabilitation ^{23,29}
Neurogenic bladder (N31.-)	Common; drives recurrent UTIs and avoidable ED visits ³⁰	Proactive bladder management; treat infection; consider urology referral for refractory symptoms ³⁰
Falls and osteoporosis (M81.0, Z91.81)	Gait impairment and long-term corticosteroid use raise fracture risk; falls are under-reported ⁶⁹	Annual fall screen; DEXA per osteoporosis guidelines; PT for balance and gait ^{69,70}
Infection risk on DMTs	Anti-CD20 and other immunosuppressive DMTs raise infection risk, compounded by immunosenescence ^{71,72}	Monitor immunoglobulins on anti-CD20; complete age-appropriate vaccines before B-cell depletion ⁷³
Fatigue (R53.83)	Affects roughly 80% of people with MS ¹	Exercise and CBT have the most consistent evidence; stimulant pharmacotherapy was no better than placebo in TRIUMPHANT-MS ²⁵

ABBREVIATIONS: BDI = Beck Depression Inventory; CBT = cognitive behavioral therapy; CV = cardiovascular; DEXA = dual-energy X-ray absorptiometry; DMT = disease-modifying therapy; ED = emergency department; HR = hazard ratio; MMSE = Mini-Mental State Examination; MS = multiple sclerosis; PHQ-9 = Patient Health Questionnaire-9; PT = physical therapy; SDMT = Symbol Digit Modalities Test; UTI = urinary tract infection

**RED FLAG — EMERGENCY/ACTIVATE CRISIS RESPONSE**

These emergency conditions require **same-day ED transfer or emergent neurology consultation**:

- **New progressive neurological deficits** (cognitive change, visual disturbance, motor weakness) in a patient on natalizumab or other immunosuppressive DMT^{57,74}
 - → **Emergent brain MRI with DWI and CSF JCV PCR to evaluate for PML**
 - × PML carries 30–50% mortality; early detection is the strongest predictor of survival
- **Acute severe myelitis with bilateral motor/sensory loss and bowel/bladder dysfunction**^{57,74}
 - → **Emergent spinal cord MRI**; differentiate complete transverse myelitis from cord compression
 - × Cord compression requires neurosurgical evaluation; delay risks permanent paralysis
- **Acute encephalopathy or altered consciousness**^{57,74}
 - → Emergent brain MRI, LP, and infectious workup; may reflect PML, severe relapse, or CNS infection
 - × Altered mental status is rare in typical MS relapses — assume PML or infection until proven otherwise
- **Acute bilateral vision loss**^{75,76}
 - → Urgent ophthalmology and neurology evaluation; test AQP4 and MOG antibodies to differentiate NMOSD
 - × Bilateral simultaneous optic neuritis is atypical for MS and suggests NMOSD, which requires different treatment
- **Brainstem relapse with respiratory compromise**^{1,38}
 - → ICU-level monitoring; high-dose IV methylprednisolone; consider PLEX if steroid-refractory
 - × Brainstem relapses affecting respiratory centers can be life-threatening

**RED FLAG — URGENT (24-72 HOURS)**

Expedited workup required = **do not** refer to routine follow-up:

- **New severe relapse** (significant motor weakness, optic neuritis with marked vision loss, or severe ataxia)^{1,77}
 - → Contact neurology within 24 hours for steroid consideration; brain MRI to confirm inflammatory activity
 - × Delays in steroid treatment may worsen relapse recovery
- **First presentation of suspected MS:** acute optic neuritis, partial myelitis, or brainstem syndrome evolving over days^{13,78}
 - → Brain and spinal cord MRI with contrast; **urgent neurology referral**
 - × Early diagnosis and DMT initiation reduce long-term disability accumulation
- **Rapid unexplained neurological decline not fitting a pseudoexacerbation** (no fever, no infection)^{32,57}
 - → **Urgent neurology evaluation**; brain MRI; consider PML or SPMS transition
 - × True neurological worsening without an identifiable trigger warrants urgent reassessment
- **≥2 new T2 lesions on surveillance MRI**⁵²
 - → Urgent neurology discussion for DMT escalation; confirms breakthrough disease activity
 - × ≥2 new T2 lesions independently predict ~3-fold relapse risk
- **JCV antibody seroconversion on natalizumab (index >1.5)**^{60,79}
 - → **Urgent discussion of DMT switch**; risk of PML rises substantially above index 1.5, especially after 24 months
 - × Continuing natalizumab at high JCV index without reassessment exposes patient to preventable PML risk
- **Worsening gait or function not explained by relapse**^{32,45}
 - → Reassess for SPMS transition; document EDSS trajectory; discuss DMT adjustment with neurology
 - × Unrecognized SPMS transition delays appropriate management and prognostic counseling

3 MEAT DOCUMENTATION ESSENTIALS

MS documentation translates a **fluctuating, lifelong neurological disease** into a record that supports continuity, quality measurement, and shared decision-making. **The most frequent pitfalls:** defaulting to the unspecified subcode (**G35.D**) instead of documenting phenotype and activity, omitting the activity modifier (active vs non-active) that distinguishes the progressive

subcodes, and failing to capture the non-physical symptoms (fatigue, depression, cognitive impairment, bladder dysfunction, gait abnormality) that **define a patient's real clinical complexity**. Each gap obscures the clinical picture and impedes coordination with neurology, rehabilitation, and mental health.^{1,15} The MEAT framework below ties each element into **appropriate clinical action**:

*A 67-year-old woman with a 19-year history of relapsing-remitting MS presents for a chronic-care visit. Over the past year she reports **gradually worsening walking distance** and balance without a discrete relapse, disabling fatigue, and low mood. She is on **ocrelizumab** managed by neurology. PMH: hypertension (amlodipine), hyperlipidemia. **No new MRI lesions in two years**. Functional status: walks ~150 m with a cane; independent in most ADLs; **recent near-falls**.*

MONITOR: "Progressive gait decline over 12 months without relapse, suggesting progression independent of relapse activity or SPMS transition. **EDSS estimated ~6.0** (unilateral walking aid for ~100 m). PHQ-9 14 (moderate depression); **SDMT below expected for age**. Blood pressure 148/88; LDL above goal."

EVALUATE: "Surveillance brain MRI ordered (stable for 2 years on therapy) plus spinal cord MRI to **evaluate progressive gait change**. Immunoglobulin level checked given long-term anti-CD20 therapy. Vascular risk reassessed → hypertension and hyperlipidemia control reviewed because vascular comorbidity accelerates disability. PT referral for balance and falls; urinalysis given new urgency."

ASSESS: "Diagnoses to document: secondary progressive MS, non-active (no relapse or new MRI lesion in the past year): **G35.C2**. Major depressive disorder, moderate (**F33.-**). MS-related gait abnormality (**R26.-**) and fatigue (**R53.83**). Essential hypertension (**I10**) and hyperlipidemia (**E78.-**). Reassess phenotype annually."

TREAT: "Neurology coordinating DMT strategy → **de-escalation discussion** pending given age/infection risk vs noninferiority data. BP to goal, statin added. SSRI started for depression; CBT referral placed. PT/OT for gait/falls. **Vaccines reviewed**: anti-CD20 timing noted. SDM and ACP documented."

Clinical Documentation Elements

- **Document the MS phenotype explicitly:** relapsing-remitting (**G35.A**), primary progressive (**G35.B-**), or secondary progressive (**G35.C-**) → phenotype drives both treatment and the ICD-10 subcode^{1,3,47}
- **Document activity status:** active (recent relapse, new MRI lesion, or progression) vs non-active (stable) = to support the progressive subcodes (**B1/C1 vs B2/C2**)^{3,47}
- **Reassess and document the phenotype at least annually;** the RRMS-to-SPMS transition changes the subcode and the treatment plan^{3,32,47}
- **Document disability and surveillance objectively:** EDSS or a patient-reported equivalent, T25FW or SDMT where available, and the most recent MRI date and findings⁵⁴
- **Code each functional and non-physical manifestation addressed at the visit:** fatigue (**R53.83**), depression (**F32.-/F33.-**), cognitive impairment (**G31.84**), neurogenic bladder (**N31.-**), gait abnormality (**R26.-**), spasticity (**R25.2/M62.83**)^{1,23}

- **Document:** DMT name, route, and monitoring (e.g., ocrelizumab IV q6 months; immunoglobulins and infection surveillance), and **distinguish a true relapse from a pseudoexacerbation**^{28,54}
- **Document:** the vascular comorbidity burden (hypertension, diabetes, hyperlipidemia, smoking) = accelerate disability and are **squarely the PCP's responsibility**^{1,65}
- **Document:** advance care planning and rehabilitation needs for patients with progressive disease and significant disability⁸⁰

Reframing Common Documentation Shortcuts

INSTEAD OF...	DOCUMENT... ^{1,3,17,23,47,80}
'Multiple sclerosis'	'Relapsing-remitting multiple sclerosis (G35.A), last relapse 14 months ago, stable on ocrelizumab; EDSS 2.5 '
'MS, progressive'	'Secondary progressive MS, non-active (G35.C2); no relapse or new MRI lesion in the past year; EDSS 6.0 '
'MS, unspecified' (G35.D) by default	Specify phenotype and activity (G35.A/G35.B1-2/G35.C1-2); reserve G35.D only when the subtype is genuinely undetermined
'On MS medication'	'Ocrelizumab 600 mg IV q6 months (neurology-managed); immunoglobulins monitored; infection surveillance; vaccinations current'
'Patient feels worse'	Distinguish relapse from pseudoexacerbation: 'Symptom worsening with UTI and low-grade fever → pseudoexacerbation (Uhthoff); no steroids; treat infection'
'Chronic fatigue'	'MS-related fatigue (R53.83); exercise and CBT counseled; stimulants not initiated (no benefit over placebo in TRIUMPHANT-MS)'
'Depression'	'Major depressive disorder, moderate (F33.-), PHQ-9 14; sertraline initiated; addressing before any DMT change to support adherence'
'Memory complaints'	'MS-related cognitive impairment (G31.84); SDMT below age expectation ; cognitive rehabilitation referral'
'Walks with a cane'	'Gait abnormality (R26.-), EDSS 6.0 ; maintenance PT for balance and falls (covered Medicare benefit)'
'Bladder problems'	'Neurogenic bladder (N31.-); recurrent UTIs addressed; proactive bladder management; urology referral if refractory'

ABBREVIATIONS: CBT = cognitive behavioral therapy; DMT = disease-modifying therapy; EDSS = Expanded Disability Status Scale; IV = intravenous; MRI = magnetic resonance imaging; MS = multiple sclerosis; PHQ-9 = Patient Health Questionnaire-9; PT = physical therapy; SDMT = Symbol Digit Modalities Test; SPMS = secondary progressive multiple sclerosis; UTI = urinary tract infection



DOCUMENTATION IS COMPREHENSIVE CODING

Every MS encounter should document the **phenotype** (RRMS, PPMS, or SPMS) and **activity status** (active vs non-active),^{3,38,47} the **current EDSS** or functional status and most recent **MRI date/findings**,^{1,23} the **DMT** and its monitoring, and the full functional and comorbidity burden (fatigue, depression, cognitive impairment, bladder dysfunction, gait abnormality, and vascular risk factors).^{1,44,81} **Reassess the phenotype annually** so the subcode reflects the **true disease course**.

4 TREATMENT AND REFERRAL QUICK GUIDE

MS treatment is driven by phenotype (relapsing vs progressive), disease activity, age, and comorbidity — not chronological age alone.^{1,65} Disease-modifying therapy is initiated and escalated by neurology, but the **PCP's highest-value contributions are**: shortening diagnostic delay, sustaining adherence, managing the vascular risk that accelerates brain volume loss, proactively treating symptoms (spasticity, fatigue, bladder, mood) to reduce ED visits and hospitalizations, and co-monitoring DMT safety.⁸² **In older adults the risk-benefit balance shifts**: high-efficacy DMTs show diminishing incremental benefit while **infection risk rises with immunosenescence**.⁶⁵ Social determinants of health **materially affect MS outcomes** and adherence and should be addressed in value-based models serving diverse Medicare populations.⁸³

Therapy Escalation Criteria

TRIGGER	ACTION* ^{1,18,54,65,82}
Demyelinating symptoms over days (optic neuritis, partial myelitis, brainstem syndrome)	Order brain and spinal cord MRI; refer to neurology promptly → do not 'wait and see'
Confirmed relapsing MS, treatment-naïve	Neurology initiates a DMT ; AAN advises offering a DMT to patients with relapsing MS and recent clinical or MRI activity
Breakthrough disease on a moderate-efficacy DMT (≥1 relapse, ≥2 new MRI lesions, or progression over 1 year)	Discuss switching to a higher-efficacy DMT or a different mechanism
≥2 new T2 lesions on annual surveillance MRI	Supports DMT escalation even if clinically stable; neurology reassessment
Acute relapse (significant new deficit, not a pseudoexacerbation)	After excluding infection/fever, neurology may give IV or oral methylprednisolone 500–1,000 mg/day × 3–5 days; plasma exchange if steroid-refractory

TRIGGER	ACTION* ^{1,18,54,65,82}
Active SPMS	Neurology; siponimod is FDA-approved for active SPMS (relapsing forms)
Primary progressive MS	Neurology; ocrelizumab is the only DMT approved for PPMS
New progressive deficit on natalizumab	Emergent MRI with DWI and CSF JCV PCR to evaluate for PML ; urgent neurology
Stable disease >2 years in a patient >60	Discuss DMT de-escalation with neurology ; discontinuation has not shown non-inferiority for MRI activity
Disabling spasticity, bladder dysfunction, fatigue, or depression	Initiate symptom-directed management ; refer to rehabilitation and mental health as needed
Progressive functional decline in older adult	Comprehensive functional assessment; maintenance rehabilitation; advance care planning

ABBREVIATIONS: AAN = American Academy of Neurology; CSF = cerebrospinal fluid; DMT = disease-modifying therapy; DWI = diffusion-weighted imaging; FDA = U.S. Food and Drug Administration; IV = intravenous; JCV = John Cunningham virus; MRI = magnetic resonance imaging; MS = multiple sclerosis; PCR = polymerase chain reaction; PML = progressive multifocal leukoencephalopathy; PPMS = primary progressive multiple sclerosis; SPMS = secondary progressive multiple sclerosis

***Consult FDA labels for the most up-to-date dosage information, contraindications, and drug-drug interactions**

AAN DMT Guideline-Aligned Treatment by Phenotype, Activity, and Patient Profile

SETTING/CLASS	PREFERRED OPTION(S)*	KEY NOTES*
Acute relapse management	IV or oral methylprednisolone 500–1,000 mg/day × 3–5 days; plasma exchange if steroid-refractory ^{1,38}	Rule out pseudoexacerbation first ; oral methylprednisolone is noninferior to IV for relapse recovery ⁷⁷
Moderate-efficacy DMT (first-line for many)	Dimethyl fumarate, teriflunomide, interferon beta, glatiramer acetate ^{54,84}	Favorable safety; relative relapse reduction vs placebo 0.62–0.84; well tolerated in older adults ⁸⁴
High-efficacy DMT (escalation or early intensive)	Ocrelizumab, natalizumab, fingolimod, ofatumumab, ublituximab, alemtuzumab, cladribine ^{84,85}	Strongest relapse reduction ; natalizumab had the largest real-world effect (HR 0.44 vs glatiramer) ⁸⁶

SETTING/CLASS	PREFERRED OPTION(S)*	KEY NOTES*
Anti-CD20 monoclonal antibodies	Ocrelizumab (IV q6 months), ofatumumab (SC monthly), ublituximab ^{1,86}	Most widely used high-efficacy class; ocrelizumab is the only agent approved for PPMS
Active secondary progressive MS	Siponimod (titrated; CYP2C9 genotyping) ³²	FDA-approved for active SPMS; EXPAND trial showed ~ 21% relative reduction in 3-month confirmed disability progression ³²
Primary progressive MS	Ocrelizumab	ORATORIO showed a ~ 20-25% relative reduction in 3-month confirmed disability progression vs placebo; the BTK inhibitor tolebrutinib reduced 6-month confirmed progression by ~ 31% in nonrelapsing SPMS in HERCULES , signaling an emerging option for progressive disease ^{87,88}
Older adults (≥55-60 y)	Continue or de-escalate per shared decision-making ⁸⁹	High-efficacy benefit narrows with age while infection risk rises; discontinuation not proven non-inferior ⁸⁹
Spasticity	Baclofen or tizanidine ; PT and structured exercise	Second-line : gabapentin, botulinum toxin (focal), intrathecal baclofen for refractory cases
Fatigue	Exercise and CBT (most consistent evidence)	Amantadine, modafinil, and methylphenidate were no better than placebo in TRIUMPHANT-MS ²⁵
Neurogenic bladder	Antimuscarinics (oxybutynin) or mirabegron ; bladder training	Botulinum toxin for refractory detrusor overactivity ; treat and prevent UTIs
Depression	SSRIs/SNRIs plus CBT	Screen annually ; address before DMT changes to support adherence

ABBREVIATIONS: AAN = American Academy of Neurology; BTK = Bruton's tyrosine kinase; CBT = cognitive behavioral therapy; CYP2C9 = cytochrome P450 2C9; DMT = disease-modifying therapy; EXPAND = Exploring the Efficacy and Safety of Siponimod in Patients With Secondary Progressive Multiple Sclerosis; FDA = Food and Drug Administration; HERCULES = Phase 3 Trial of Tolebrutinib in Nonrelapsing Secondary Progressive Multiple Sclerosis; HR = hazard ratio; IV = intravenous; MS = multiple sclerosis; PPMS = primary progressive multiple sclerosis; PT = physical therapy; q6 months = every 6 months; SC = subcutaneous; SNRI = serotonin-norepinephrine reuptake inhibitor; SPMS = secondary progressive multiple sclerosis; SSRI = selective serotonin reuptake inhibitor; TRIUMPHANT-MS = Trial of Amantadine, Modafinil, and Methylphenidate for MS-Related Fatigue; UTI = urinary tract infection

***Consult FDA labels for the most up-to-date dosage information, contraindications, and drug-drug interactions**



CLINICAL PEARL — PHENOTYPE & FUNCTION > CHRONOLOGIC AGE

Treat MS by phenotype and function, not chronological age.^{54,65} In older adults the incremental benefit of high-efficacy DMTs over moderate-efficacy agents narrows, while infection risk rises with **immunosenesence compounded by immunosuppression**. Age alone should not preclude treatment: DMTs were as beneficial in late-onset RRMS as in adult-onset RRMS over 2 years.⁹⁰ **The highest-yield interventions in older patients are** proactive symptom management and vascular-risk control, which slow disability and reduce avoidable ED visits and hospitalizations.⁹⁰

Non-Pharmacologic Care and Supportive Interventions

INTERVENTION	TARGET/RECOMMENDATION	NOTES
Exercise/structured physical activity	Encourage as tolerated; associated with improved fatigue, mood, and possibly brain volume ²⁴	Low risk; among the most consistently beneficial nonpharmacologic measures ²⁴
Maintenance PT/OT/speech therapy	Prescribe proactively to prevent functional decline ²⁴	A covered Medicare benefit; should not be denied for 'lack of restoration potential' ²⁴
Fatigue self-management	Energy conservation, heat avoidance, CBT	Exercise and CBT outperform stimulant pharmacotherapy , which was placebo-equivalent in TRIUMPHANT-MS ²⁵
Spasticity management	Stretching, PT, structured exercise, TENS alongside pharmacotherapy ²⁶	Multimodal care reduces disability and supports mobility ^{24,26}
Smoking cessation	Quitline; pharmacotherapy as appropriate ³⁹	The most actionable modifiable risk factor; smoking accelerates SPMS conversion ³⁹
Cognitive engagement and rehabilitation	Intellectually challenging activity; neuropsychological rehab and OT ²⁹	Associated with improved cognitive function; pair with SDMT monitoring ^{26,29}
Self-management education	Adjusting outlook, stress and symptom management, communication, planning	Structured, multicomponent self-management improves quality of life

INTERVENTION	TARGET/RECOMMENDATION	NOTES
Advance care planning	Annually and when goals change ⁹¹	Especially relevant in progressive MS with significant disability ⁹¹

ABBREVIATIONS: CBT = cognitive behavioral therapy; DMT = disease-modifying therapy; MS = multiple sclerosis; OT = occupational therapy; PT = physical therapy; SDMT = Symbol Digit Modalities Test; SPMS = secondary progressive multiple sclerosis; TENS = transcutaneous electrical nerve stimulation; TRIUMPHANT-MS = Trial of Amantadine, Modafinil, and Methylphenidate for MS-Related Fatigue

Medication Safety and Key Interactions

DRUG/CLASS	INTERACTION/TOXICITY* ^{1,60,65,92}	CLINICAL ACTION* ^{54,93-95}
Natalizumab	Progressive multifocal leukoencephalopathy (PML); risk rises with JCV antibody index, prior immunosuppression, and treatment duration	JCV antibody index every 6 months ; emergent MRI + CSF JCV PCR for new progressive deficits; discuss switch if index >1.5
Ocrelizumab/ ofatumumab/ ublituximab (anti-CD20)	Hypogammaglobulinemia , infection risk, blunted vaccine response; infusion reactions	HBV screening before start ; monitor immunoglobulins (especially in older adults); vaccinate before initiation
Fingolimod/ siponimod (S1P modulators)	First-dose bradycardia/AV block ; macular edema; lymphopenia; may worsen hypertension	First-dose cardiac monitoring ; baseline ophthalmologic exam; CBC; CYP2C9 genotyping for siponimod
Dimethyl fumarate	Lymphopenia (risk rises with age); GI effects; rare PML with prolonged lymphopenia	CBC every 6 months ; monitor absolute lymphocyte count; hold if persistently low
Teriflunomide	Hepatotoxicity ; may worsen hypertension; teratogenicity	LFTs monthly × 6 months then periodically; blood pressure; TB screening before start
Alemtuzumab/ cladribine	Autoimmune thyroid disease, ITP, nephropathy (alemtuzumab); lymphopenia, malignancy risk (cladribine)	Specialist-managed with REMS-level monitoring; limited data in older adults
High-dose corticosteroids (relapse)	Hyperglycemia, mood change, insomnia, osteoporosis with repeated courses	Reserve for confirmed relapse (not pseudoexacerbation); monitor glucose; bone health with recurrent use

DRUG/CLASS	INTERACTION/TOXICITY* ^{1,60,65,92}	CLINICAL ACTION* ^{54,93-95}
Polypharmacy in older adults	Symptomatic agents (anticholinergics, gabapentinoids) add sedation and fall risk	Medication reconciliation each visit ; deprescribe where possible; weigh anticholinergic burden

ABBREVIATIONS: AV = atrioventricular; CBC = complete blood count; CSF = cerebrospinal fluid; CYP2C9 = cytochrome P450 2C9; FDA = Food and Drug Administration; GI = gastrointestinal; HBV = hepatitis B virus; ITP = immune thrombocytopenic purpura; JCV = John Cunningham virus; LFTs = liver function tests; MRI = magnetic resonance imaging; PCR = polymerase chain reaction; PML = progressive multifocal leukoencephalopathy; REMS = Risk Evaluation and Mitigation Strategy; S1P = sphingosine-1-phosphate; TB = tuberculosis

***Consult FDA labels for the most up-to-date dosage information, contraindications, and drug-drug interactions**

When to Refer

CRITERION ^{15,54,81}	SPECIALIST ^{1,22,23}	URGENCY ^{17,54,96}
Suspected PML on immunosuppressive DMT	Emergency department/ neurology	Emergent
Acute severe myelitis with bowel/bladder dysfunction	Emergency department/ neurology	Emergent
Acute bilateral vision loss (possible NMOSD)	Emergency department/ neurology/ophthalmology	Emergent
New severe relapse for steroid consideration	Neurology	Urgent (24–72 hours)
First presentation of suspected MS	Neurology (after MRI ordered)	Urgent (within days)
JCV seroconversion on natalizumab (index >1.5)	Neurology	Urgent (within days)
≥2 new T2 lesions on surveillance MRI	Neurology	Expedited (within days)
Worsening gait/function not explained by relapse	Neurology (phenotype reassessment)	Expedited (within days)
Refractory spasticity or neurogenic bladder	Rehabilitation medicine/ urology	Routine
Moderate-to-severe depression	Behavioral health	Routine
Progressive disability needing supportive care	Rehabilitation; palliative care when appropriate	Routine

CRITERION ^{15,54,81}	SPECIALIST ^{1,22,23}	URGENCY ^{17,54,96}
ABBREVIATIONS: DMT = disease-modifying therapy; JCV = John Cunningham virus; MRI = magnetic resonance imaging; MS = multiple sclerosis; NMOSD = neuromyelitis optica spectrum disorder; PML = progressive multifocal leukoencephalopathy; T2 = T2-weighted magnetic resonance imaging		

Follow-Up Timing

CATEGORY	FREQUENCY ^{1,17,54,96}	LABS/MONITORING ^{1,17,54,96}
Relapsing-remitting MS on DMT (G35.A)	Clinical review q3-6 months ; brain MRI annually with a new baseline 3-6 months after start/switch	Track relapses and new T2/enhancing lesions ; ≥2 new T2 lesions supports escalation
Secondary progressive MS (G35.C-)	Clinical review q3-6 months ; MRI per neurology	Reassess phenotype and activity; monitor PIRA and functional status (EDSS, T25FW)
Primary progressive MS (G35.B-)	Clinical review q3-6 months ; MRI per neurology	Function-focused monitoring ; ocrelizumab response and infection surveillance
Cognitive screening	Annually with SDMT	A 4-point SDMT decline is clinically meaningful; MMSE is insensitive in MS
Depression screening	Annually (PHQ-9 or BDI, BDI cutoff ≥13)	Address before DMT changes to support adherence
Fall risk	Annual fall screen, especially with gait impairment or chronic steroids	PT for balance/gait; DEXA per osteoporosis guidelines
Vascular risk factors	Every visit	Blood pressure, glucose, lipids, smoking = control slows brain volume loss and disability
Anti-CD20 therapy safety	Immunoglobulins periodically; infection surveillance	More frequent attention in older adults given immunosenescence
Brain atrophy (where available)	Per neurology ; incorporated into NEDA-4	Annual brain volume loss >0.4% suggests pathologic atrophy beyond normal aging

ABBREVIATIONS: DMT = disease-modifying therapy; MRI = magnetic resonance imaging; MS = multiple sclerosis; T2 = T2-weighted magnetic resonance imaging; PIRA = progression independent of relapse activity; EDSS = Expanded Disability Status Scale; T25FW = Timed 25-Foot Walk; SDMT = Symbol Digit Modalities Test; MMSE = Mini-Mental State Examination; PHQ-9 = Patient Health Questionnaire-9; BDI = Beck Depression Inventory; PT = physical therapy; DEXA = dual-energy X-ray absorptiometry; CD20 = cluster of differentiation 20; NEDA-4 = no evidence of disease activity-4

Comorbidity Management — Primary Care Role

COMORBIDITY	APPROACH	CAUTION*
Hypertension/vascular risk (I10)	Treat BP, lipids, glucose to goal ; smoking cessation at every visit	Vascular comorbidity accelerates disability and brain volume loss; not optional in MS care ^{1,66}
Depression/anxiety (F32.x, F41.x)	Annual PHQ-9 ; SSRI/SNRI plus CBT referral ²²	Underdiagnosed ; impairs cognition and DMT adherence; address before attributing symptoms to MS progression ²²
Cognitive impairment (G31.84)	SDMT annually ; cognitive rehabilitation; caregiver support ^{23,29}	MMSE is insensitive for MS ; impairment affects 40–70% and is rarely coded ^{23,29}
Neurogenic bladder (N31.x)	Antimuscarinics or mirabegron ; bladder training; treat/prevent UTIs ^{26,31}	Drives recurrent UTIs and avoidable ED visits when neglected ^{26,31}
Osteoporosis/falls (M81.0, Z91.81)	DEXA ; calcium/vitamin D; PT for balance; bisphosphonate if indicated ⁹⁷	Chronic corticosteroids and gait impairment raise fracture risk ; screen annually ⁹⁷
Infection risk on immunosuppressive DMTs	Vaccinate before B-cell depletion ; monitor immunoglobulins; treat infections promptly ^{81,98}	Immunosenescence compounds DMT-related infection risk in older adults ^{81,98}
Spasticity (R25.2/ M62.83)	Baclofen/tizanidine; PT; botulinum toxin for focal spasticity ²⁶	Untreated spasticity worsens mobility, pain, and falls ²⁶
Polypharmacy (Z79.x)	Medication reconciliation each visit; deprescribing review	Anticholinergic and sedating agents add fall and cognitive risk in older adults ¹

ABBREVIATIONS: BP = blood pressure; MS = multiple sclerosis; PHQ-9 = Patient Health Questionnaire-9; SSRI = selective serotonin reuptake inhibitor; SNRI = serotonin-norepinephrine reuptake inhibitor; CBT = cognitive behavioral therapy; DMT = disease-modifying therapy; SDMT = Symbol Digit Modalities Test; MMSE = Mini-Mental State Examination; UTI = urinary tract infection; ED = emergency department; DEXA = dual-energy X-ray absorptiometry; PT = physical therapy; B-cell = B lymphocyte

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Cost-Smart Options

BRAND (EST. COST) ^{7,99}	GENERIC/ ALTERNATIVE (EST. COST) ^{*7,99,100}	EST. SAVINGS	COST-SMART TIP ^{7,101}
Copaxone (glatiramer acetate) 40 mg 3x/wk (~\$22,000-\$26,600/yr list)	Generic glatiramer acetate (Glatopa/Mylan) (~\$1,800-\$6,000/yr)	~\$16,000- \$24,000/yr	Lowest-cost branded DMT ; moderate-efficacy injectable for low-activity RRMS; Part D OOP capped at \$2,000/yr
Tecfidera (dimethyl fumarate) 240 mg BID (~\$96,000/yr list)	Generic dimethyl fumarate (~\$130-\$415/yr DTC; ~\$720-\$1,050/yr Part D)	~\$7,500- \$8,000/yr OOP	Lowest-cost oral DMT via DTC pharmacy (~\$415/yr); monitor ALC q6 months
Gilenya (fingolimod) 0.5 mg daily (~\$115,000/yr list)	Generic fingolimod (~\$1,040-\$2,000/yr post-IRA)	~\$6,800- \$8,500/yr OOP	Generic high-efficacy oral ; first-dose 6-hour cardiac monitoring still required
Aubagio (teriflunomide) 14 mg daily (~\$103,000/yr list)	Generic teriflunomide (~\$130-\$210/yr DTC)	~\$7,800- \$9,300/yr OOP	Cheapest DMT at ~\$133/yr DTC ; teratogenic = requires washout before conception
Ocrevus (ocrelizumab) 600 mg q6mo (~\$67,000/yr list)	Off-label rituximab (~\$5,000-\$10,000/yr with biosimilars)	~\$35,000- \$66,000 over 5 yr	WHO Essential Medicines List for MS ; ¹⁰² biosimilars reduce cost further; did not meet noninferiority to ocrelizumab in registry data
Tysabri (natalizumab) 300 mg q4wk (~\$102,000/yr list; ~\$75,000/yr net)	No generic ; biosimilar FDA-approved 2023, US launch pending	Pending	Highest-efficacy monotherapy ; extended-interval dosing (q6wk) may reduce cost and PML risk
Kesimpta (ofatumumab) 20 mg SC monthly (~\$83,000-\$88,000/yr list)	No generic (exclusivity through ~2032)	—	Self-administered SC anti-CD20 ; no infusion costs; MPPP reduces OOP to ~\$167/mo
Mayzent (siponimod) 2 mg daily (~\$107,000/yr list)	No generic available	—	Only S1P modulator with phase 3 SPMS data ; CYP2C9 genotyping required before initiation

BRAND (EST. COST) ^{7,99}	GENERIC/ ALTERNATIVE (EST. COST)* ^{7,99,100}	EST. SAVINGS	COST-SMART TIP ^{7,101}
All self-administered Part D DMTs	IRA Part D \$2,000 OOP cap + MPPP	Up to thousands/yr	OOP reduced 68%-79% for brand DMTs; MPPP spreads to ~\$167/mo ; confirm LIS/Extra Help eligibility

ABBREVIATIONS: DMT = disease-modifying therapy; RRMS = relapsing-remitting multiple sclerosis; OOP = out-of-pocket; BID = twice daily; DTC = direct-to-consumer; ALC = absolute lymphocyte count; IRA = Inflation Reduction Act; q6mo = every 6 months; WHO = World Health Organization; MS = multiple sclerosis; FDA = Food and Drug Administration; US = United States; q4wk = every 4 weeks; PML = progressive multifocal leukoencephalopathy; SC = subcutaneous; CD20 = cluster of differentiation 20; MPPP = Medicare Prescription Payment Plan; S1P = sphingosine-1-phosphate; SPMS = secondary progressive multiple sclerosis; CYP2C9 = cytochrome P450 2C9; LIS = Low-Income Subsidy

***Consult FDA labels for the most up-to-date dosage information, contraindications, and drug-drug interactions**

Patient Education and Adherence

MS patient education is distinguished by the **invisible nature of many symptoms** (fatigue, cognitive slowing, depression),¹ the concept of "**smoldering**" **disease activity** beneath clinical stability, which makes adherence feel counterintuitive when feeling well, the need to **differentiate true relapses from pseudoexacerbations** (which do not require steroids), and the complexity of DMT options spanning injectable, oral, and infusion platforms with distinct safety monitoring requirements.^{1,27,54,103} **Education should emphasize:** why MRI surveillance and DMT adherence matter even during clinical stability, how vascular-risk control directly slows disability progression, and what cost-support resources exist to sustain access to therapy.



DOCUMENTATION — PATIENT EDUCATION

Document the following education topics, the patient and caregiver(s) present, materials provided, and patient understanding (**teach-back method**):

- **Diagnosis and phenotype in plain language:**⁵⁴ Document that the patient understands their MS subtype (RRMS, PPMS, SPMS), what "active" vs "non-active" means, and that MS is a lifelong condition requiring ongoing monitoring **even during periods of stability**
- **Smoldering progression and why monitoring matters when feeling well:**^{29,103} Document counseling that brain volume loss and subclinical disease activity can occur **without noticeable symptoms**; this is why regular MRI surveillance and cognitive testing (**SDMT**) are essential even when the patient feels unchanged
- **Relapse vs pseudoexacerbation (Uhthoff phenomenon):**^{1,27} Document counseling on how to distinguish a **true relapse** (new or worsening neurologic symptoms lasting >24 hours without fever/infection) from a **pseudoexacerbation** triggered by heat, infection, or stress, which resolves with the trigger and **does not require steroids**
- **DMT plan, route, and monitoring:**^{1,54,81} Document modalities discussed (injectable, oral, infusion); shared decision-making regarding efficacy, safety profile, and lifestyle fit; **specific monitoring requirements** (e.g., JCV index for natalizumab, immunoglobulins for anti-CD20 therapies, first-dose cardiac monitoring for S1P modulators); patient questions and preferences recorded
- **Vascular-risk control:**^{1,39} Document counseling that hypertension, dyslipidemia, smoking, and diabetes each independently accelerate MS disability progression and brain volume loss; blood pressure, lipid, and glucose targets reviewed; **smoking cessation plan** documented
- **What to report between visits:**¹ New or worsening weakness, numbness, vision changes, or bladder dysfunction lasting >24 hours (possible relapse); fever or infection symptoms during immunosuppressive therapy; **signs of PML** (progressive confusion, visual changes, personality change) for patients on natalizumab or anti-CD20 therapies
- **Cost-support resources and adherence:**^{7,104} Document counseling on the **IRA \$2,000 Part D out-of-pocket cap**, manufacturer patient-assistance programs, specialty pharmacy support, and LIS/Extra Help enrollment; **cost is a leading driver of DMT nonadherence** in Medicare populations
- **Advance care planning:**⁹¹ Surrogate designation, code status, goals of care; CPT 99497/99498 billable during AWW with no patient copay; particularly relevant as disability accumulates and at the SPMS transition
- **Caregiver assessment:** Document caregiver present, their understanding of DMT schedule, relapse recognition, and surveillance plan; screen for caregiver burden; **refer to social work if strain identified**

Quality Metrics Tie-In

No MS-specific HEDIS measures are currently active in MY2026, but MS intersects multiple quality measurement domains: depression screening (PHQ-9), fall risk, blood pressure control (vascular comorbidity acceleration of disability), bone health (immobility- and steroid-related osteoporosis), medication adherence (DMT access and Part D utilization), and advance care planning. **MS's combination of** lifelong DMT management, progressive disability with fall and fracture risk, underrecognized depression, vascular comorbidity-driven brain volume loss, and polypharmacy in advanced disease means that **cross-cutting national measures apply across the care trajectory** and can anchor quality reporting for any clinician managing an MS patient in a value-based program.

MEASURE	STANDARD	APPLICABILITY TO MS
HEDIS DMS-E: Utilization of the PHQ-9 to Monitor Depression Symptoms	Denominator: enrollees ≥ 12 with major depression/dysthymia AND PHQ-9 ≥ 10 Numerator: follow-up PHQ-9 within 4–8 months of index elevated score Exclusions: hospice	Depression prevalence in MS is 3x the general population; ¹⁰⁵ some DMTs and corticosteroid pulses may exacerbate mood symptoms ⁶⁸
HEDIS CBP: Controlling High Blood Pressure	Denominator: adults 18–85 with hypertension Numerator: BP 140/90 mmHg; Exclusions: hospice, ESRD, inpatient palliative care	Vascular comorbidities accelerate MS disability progression and brain volume loss; ¹ hypertension and dyslipidemia each independently worsen EDSS trajectory ^{1,49}
HEDIS COA: Care for Older Adults — Medication Review	Denominator: MA enrollees ≥ 66 , continuously enrolled Numerator: medication review documented annually Exclusions: hospice, ESRD	DMT polypharmacy (anti-CD20, S1P modulators) plus symptomatic medications (baclofen, gabapentin, anticholinergics) create interaction and fall risk ; ¹⁰⁶ medication review should reconcile immunosuppressive burden against infection and comorbidity risk ^{106,107}
HEDIS COA: Care for Older Adults — Functional Status Assessment	Denominator: enrollees ≥ 66 ; Numerator: functional status assessment documented annually; Exclusions: hospice, ESRD	EDSS and SDMT directly satisfy this sub-measure; document at every visit to guide DMT continuation vs de-escalation decisions in aging MS patients ²⁹
HEDIS ACP: Advance Care Planning	Denominator: enrollees ≥ 66 ; Numerator: advance care plan or surrogate decision-maker documented, OR ACP discussed but patient declined Exclusions: hospice	ACP should be addressed as disability accumulates, particularly at SPMS transition ; billable as CPT 99497/99498 during AWW with no copay

MEASURE	STANDARD	APPLICABILITY TO MS
HEDIS Part D Medication Adherence	Denominator: Part D enrollees ≥ 18 with ≥ 2 fills of a medication in the target class (diabetes, hypertension, or cholesterol) during the measurement year Numerator: PDC $\geq 80\%$ for the target medication class; Exclusions: hospice, ESRD	The IRA \$2,000 Part D out-of-pocket cap supports DMT adherence and is a key VBC target ^{7,104}
MIPS #513: Patient-Reported Falls and Plan of Care	Denominator: patients ≥ 18 with documented fall in past year Numerator: plan of care for falls documented Exclusions: tic disorder, epilepsy, concussion/mTBI	MS patients have 50-60% annual fall prevalence; ⁷⁰ gait impairment, spasticity, and sensory loss are primary drivers

ABBREVIATIONS: PHQ-9 = Patient Health Questionnaire-9; MS = multiple sclerosis; DMT = disease-modifying therapy; HEDIS = Healthcare Effectiveness Data and Information Set; CBP = Controlling High Blood Pressure; BP = blood pressure; mmHg = millimeters of mercury; ESRD = end-stage renal disease; COA = Care for Older Adults; MA = Medicare Advantage; CD20 = cluster of differentiation 20; S1P = sphingosine-1-phosphate; EDSS = Expanded Disability Status Scale; SDMT = Symbol Digit Modalities Test; ACP = advance care planning; SPMS = secondary progressive multiple sclerosis; CPT = Current Procedural Terminology; AWW = Annual Wellness Visit; PDC = proportion of days covered; IRA = Inflation Reduction Act; VBC = value-based care; MIPS = Merit-based Incentive Payment System; mTBI = mild traumatic brain injury; SDoH = social determinants of health



QUALITY OUTCOME

When primary care shortens diagnostic delay by ordering MRI at the first demyelinating symptoms, documents phenotype and activity accurately, **sustains DMT adherence and vaccination**, controls vascular risk to slow brain volume loss, and proactively manages spasticity, fatigue, bladder, and mood — people with MS spend more time in stable rather than progressive states, with **fewer ED visits and hospitalizations**.

5 CODING REMINDERS AND CASE EXAMPLES

Coding Specificity

- **Document MS phenotype at every encounter:**⁴ **G35.A** relapsing-remitting; **G35.B-** primary progressive; **G35.C-** secondary progressive. **Specify activity status:** active (recent relapse, new MRI lesion, or progression) vs non-active (stable) = **completes the subcode** (e.g., G35.B1 active vs G35.B2 non-active). Defaulting to **G35.D** (unspecified) when the subtype is known = **most common MS coding error**

- **Reassess phenotype at least annually:** the RRMS-to-SPMS transition changes the subcode from **G35.A** to **G35.C-** and may **alter treatment eligibility**. Do not carry forward a stale phenotype **without clinical reassessment**
- **Functional and demyelinating manifestations coded separately and linked to MS:** fatigue **R53.83**; depression **F32.-/F33.-**; cognitive impairment **G31.84**; neurogenic bladder **N31.-**; gait abnormality **R26.-**; spasticity **R25.2/M62.83**. Code optic neuritis (**H46.1-** with laterality) and acute transverse myelitis (**G37.3**) distinctly, not as nonspecific complaints. **Do not assign G12.21** (ALS) for MS patients **unless** ALS is independently diagnosed
- **Comorbidities = frequently undercoded:** hypertension **I10**, hyperlipidemia **E78.-**, diabetes **E11.-**, osteoporosis **M81.0**, long-term DMT **Z79.-**. These are MS-relevant vascular and skeletal risk factors and should be coded when addressed
- **Definitive diagnostic language:** document MS only after dissemination in time and space is established; avoid committing to MS **from a single event or imaging alone**¹

Annual Clinical Review and Confirmation

- **Annual reconfirmation and visit modality:** MS must be reassessed **once per calendar year** via in-person **or** synchronous audio-video encounter with MEAT documented = phenotype, activity status, current EDSS or functional status, most recent MRI findings, and DMT with monitoring data. Chart updates without an encounter do not satisfy MEAT. Under CMS-HCC V28, all MS subcodes (**G35.A** through **G35.D**) map to **HCC 198** (CNA RAF = **0.647**);^{10,11} the documentation value of specifying active vs non-active lies in clinical accuracy and continuity, not additional risk capture
- **Status reconfirmation at every annual visit:** document current phenotype and activity status, current DMT with drug/dose/route/last infusion date, most recent MRI activity, EDSS, and SDMT.^{3,15,17} "Stable on ocrelizumab" without objective data **does not satisfy MEAT**: include MRI date/result, IgG level, and functional scores
- **Reconfirm functional comorbidities annually:** fatigue, depression, cognitive impairment, neurogenic bladder, spasticity, and osteoporosis should be reviewed and recoded as currently active or resolved at each annual visit. Update vascular-risk documentation (BP, lipids, glucose, smoking) at each encounter
- **Avoid rollover: do not** copy last year's MS note forward **without updating:** phenotype/activity status, DMT and monitoring labs (JCV index, immunoglobulins, CBC), surveillance MRI results, EDSS/SDMT, vascular and functional comorbidity burden, and vaccination status

EHR Workflow Tips

- **[EHR TIP — Smartphrase]** Build a **.msvisit dot phrase** that auto-populates **G35.xx** subcode with phenotype/activity, current DMT (drug/dose/route/last infusion), EDSS, monitoring labs with dates (JCV index, immunoglobulins, CBC), last MRI date/activity,

vascular-risk fields, and SDMT/PHQ-9 scores. Companion **.msmeat block: Monitor** (relapses, MRI activity, EDSS trend, SDMT, vascular risk); **Evaluate** (neuro exam, MRI, labs, JCV trend); **Assess** (G35.xx phenotype/activity, trajectory); **Treat** (DMT details, vascular-risk plan, follow-up). Reduces unspecified G35 coding and supports MEAT in a single paste

- **[EHR TIP — Alert] Natalizumab JCV check:** BPA fires when JCV index >1.5 **or** not updated in 6 months. **Anti-CD20 IgG check:** BPA fires when ocrelizumab/ofatumumab is active without IgG in 12 months. **S1P first-dose:** BPA fires at fingolimod/siponimod initiation without documented cardiac monitoring or ophthalmology clearance
- **[EHR TIP — Best Practice] Problem list:** "Secondary progressive MS, non-active, EDSS 6.0, on ocrelizumab" — not "multiple sclerosis." Update phenotype/activity **at every visit**. Code MS comorbidities individually (spasticity, neurogenic bladder, depression, osteoporosis). **Flag Z86.16 persisting** while active DMT is on the med list → likely miscoded
- **[EHR TIP — Order Set] "MS Annual Workup":** CBC, CMP, immunoglobulins, JCV index (if natalizumab), 25-OH vitamin D, MRI brain/cord, SDMT, PHQ-9, fall screen, DEXA if indicated. **"MS Rebaseline MRI":** brain and cord MRI 3–6 months post-DMT switch = triggered when new DMT start is documented
- **[EHR TIP — Auto-prompt]** Annual MRI, SDMT, and PHQ-9 fire **if not completed in 11 months**. JCV index >1.5 on natalizumab fires DMT reassessment. IgG <500 on anti-CD20 fires dose-delay prompt. EDSS worsening ≥1.0 point sustained 6 months fires phenotype reassessment and neurorehab referral. One-click referral template auto-populates phenotype, EDSS, DMT, last MRI, and labs

Brief Case Examples

SUCCESS: COMPREHENSIVE DOCUMENTATION

SCENARIO

A 67-year-old woman with a 19-year history of **relapsing-remitting MS**; gradual gait decline over 12 months without a discrete relapse; disabling fatigue; low mood; on ocrelizumab; PMH hypertension, hyperlipidemia; walks ~150 m with a cane.

Documentation: "Secondary progressive MS, non-active (**G35**) — phenotype reassessed per Lublin criteria; no relapse or new MRI lesion in past year; EDSS ~6.0. PHQ-9 14 → MDD, moderate (F33.1); sertraline started MS-related gait abnormality (R26.89) and fatigue (R53.83). Ocrelizumab 600 mg IV q6 mo; immunoglobulins checked (hypogammaglobulinemia risk rises after ~3 years on anti-CD20). Vaccinations current per AAN guideline. Hypertension (I10) and hyperlipidemia (E78.5) — intensifying control; vascular comorbidities accelerate ambulatory disability. Maintenance PT authorized. ACP documented during AWW. Care coordinated with neurology."

Outcome: Phenotype reassessed from RRMS to SPMS with activity/progression modifiers evaluated annually. Vascular risk intensified; sertraline started for moderate MDD; maintenance PT for balance and falls authorized. Immunoglobulin surveillance initiated on anti-CD20 therapy. Vaccinations confirmed current. ACP documented during AWW. Care coordinated with neurology; no avoidable ED visit over the next year.

PITFALL: INSUFFICIENT DOCUMENTATION

Documentation as written: "72-year-old with MS, stable. Continue meds. Multiple sclerosis, unspecified (**G35**)."

Consequence: Phenotype and activity status **not documented**; **G35** used by default = the most common **MS coding gap**. Disabling fatigue, depression, and a recent fall went uncoded, understating complexity.^{1,65} No vascular-risk reassessment **despite hypertension**, which is associated with **accelerated disability progression** in MS.

RAF Impact: MS maps to **HCC 198** (CNA RAF 0.647) whether or not the subtype is specified, so the RAF is unchanged; the unspecified note **misrepresents the clinical course**, omits functional comorbidities that define complexity, and **weakens continuity and quality reporting**.⁴

Fix: "Relapsing-remitting MS (**G35**) vs secondary progressive → reassess phenotype this year. MS-related fatigue (**R53.83**); depression screened (PHQ-9); recent fall → fall-risk assessment and PT. Hypertension control intensified (vascular comorbidities associated with increased ambulation disability). Immunoglobulins checked given anti-CD20 duration. Vaccinations reviewed per AAN guideline."

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