

2025 CMS Proposed Rule Summation HOPPS

Overview

On July 10, 2024, the Centers for Medicare & Medicaid Services (CMS) published the proposed Medicare payment rates for hospital outpatient services. The proposed rates have a 60-day comment period which will end on September 09, 2024. The final rule will be issued in November. As expected, there are several proposed changes that will affect radiation oncology, they are listed below:

- Overall, all HOPPS payments increase, slight reduction in radiation oncology
- Reassignment of scalp cooling device
- Brachytherapy APC
- New technology of Biology Guided Radiation Therapy (BgRT)
- Changes to payments for Radiopharmaceuticals
- Proposed changes to Colorectal Screening coverage

CMS will continue enforcing the 2.0% payment reduction for hospitals that do not meet outpatient quality reporting requirements. This is achieved by applying a reporting factor of 0.9805 to the OPSS payments and copayments for all relevant services.

Additional commentary on the proposed topics can be found below.

Scalp Cooling Device:

CPT code 0662T, effective July 1, 2021, describes the initial measurement and calibration of a scalp cooling device used during chemotherapy to prevent hair loss. According to Medicare's NCD policy (NCD 110.6), the cooling cap is classified as an incident to supply and is not paid under OPSS. However, calibration and fitting of the cap incur significant costs (\$1,900 to \$2,400). CPT guidance specifies that code 0662T should be billed once per chemotherapy course, regardless of the number of sessions (e.g., 6 or 18 sessions). CMS proposes to change this low volume code (0662T) to the new technology APC group 1515 with an increase in the payment rate to \$1,350.50.

Brachytherapy

In 2022, CMS implemented a policy to designate clinical and brachytherapy APCs as low volume if they have fewer than 100 single claims available for rate setting in the claims year used for the prospective year's rate setting.

For the CY 2025 OPPS/ASC proposed rule, based on available claims data, CMS proposes designating six brachytherapy APCs as low volume APCs under the OPPS. These APCs have fewer than 100 single claims in the rate setting year (CY 2023 for CY 2025). See exhibit A below.

Exhibit A: Proposed Low Volume APCs for CY 2025

TABLE 78: PROPOSED LOW VOLUME APCS USING STANDARD (ASC) RATESETTING METHODOLOGY FOR CY 2025

APC	APC Description	CY 2023 Claims Available for Ratesetting
2632	Iodine I-125 sodium iodide	0*
2635	Brachytx, non-str, HA, P-103	13
2636	Brachy linear, non-str, P-103	1
2642	Brachytx, stranded, C-131	90
2645	Brachytx, non-str, gold-198	86
2647	Brachytx, NS, Non-HDRIr-192	2

Radiopharmaceuticals

CMS proposes separate payments for diagnostic radiopharmaceuticals with per-day costs exceeding \$630, about twice the current average cost. This threshold will be updated annually based on the Producer Price Index for Pharmaceutical Preparations. Payments will be based on the Mean Unit Cost from OPPS claims, with a request for feedback on using the Average Sales Price for future payments.

Biology Guided Radiation Therapy (BgRT)

Biology Guided Radiation Therapy (BgRT) uses positron-emitting radiopharmaceuticals to deliver targeted radiation therapy for primary and metastatic lung or bone tumors. Effective January 1, 2024, CMS introduced HCPCS codes C9794 and C9795 for BgRT. Code C9794 covers complex radiology simulation-aided field setting and modeling, assigned to APC 1521 with a payment rate of \$1,950.50. Code C9795 includes treatment delivery, image guidance, and real-time adjustments, assigned to APC 1525 with a payment rate of \$3,750.50. For CY 2025, these

payment rates will remain the same, based on 2023 claims data, as no new data is available for these services.

Colorectal Cancer Screening Proposed Coverage Under OPPS for CY 2025

Discontinuation of Barium Enema Codes: CMS proposes to remove Medicare coverage for barium enema screenings, effective January 1, 2025. Consequently, HCPCS codes G0106, G0120, and G0122 will be deleted on December 31, 2024. These codes will have their status indicator changed from "S" (separately payable) to "D" (discontinued).

Reassignment of CPT Code 74263: Screening computed tomography colonography (CTC)/virtual colonoscopy, currently not covered (status indicator "E1"), will be reassigned to status indicator "S" and APC 5522 (Level 2 Imaging Without Contrast) to indicate separate payment. This is based on its clinical and resource similarity to diagnostic virtual colonoscopy (CPT code 74261).

Continuation of Blood-Based Biomarker Screening: HCPCS code G0327, for screening blood-based biomarker, will continue to be assigned status indicator "A," indicating separate payment under the Clinical Laboratory Fee Schedule (CLFS). This reflects the expanded coverage to include blood-based biomarker tests for detecting colorectal cancer.

Comments or concerns? We encourage our clients and colleagues to provide commentary to CMS on these proposed changes by contacting CMS at <https://www.regulations.gov/commenton/CMS-2024-0199-0001> by 5pm EST on September 9, 2024.

Questions? Contact your RBS team for more information.

Addendum B. - Proposed OPSS Payment by HCPCS Code for CY 2025															
CPT codes and descriptions only are copyright 2022 American Medical Association. All Rights Reserved. Applicable FARS/DFARS Apply. Dental codes (D codes) are copyright 2022 American Dental Association. All Rights Reserved.						2024				2025 Proposed				2025 Proposed to 2024 Actual	
HCPCS Code	Short Descriptor	SI	APC	Relative Weight	Payment Rate	SI	APC	Relative Weight	Payment Rate	Payment Rate Relative Change	Payment rate % change				
77280	Set radiation therapy field	S	5611	1.4810	\$129.41	S	5611	1.4795	\$129.28	-\$0.13	-0.1%				
77290	Set radiation therapy field	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77295	3-d radiotherapy plan	S	5613	15.1242	\$1,321.58	S	5613	15.1085	\$1,320.21	-\$1.37	-0.1%				
77300	Radiation therapy dose plan	S	5611	1.4810	\$129.41	S	5611	1.4795	\$129.28	-\$0.13	-0.1%				
77301	Radiotherapy dose plan imrt	S	5613	15.1242	\$1,321.58	S	5613	15.1085	\$1,320.21	-\$1.37	-0.1%				
77306	Telethx isodose plan simple	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77307	Telethx isodose plan cplx	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77316	Brachytx isodose plan simple	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77317	Brachytx isodose intermed	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77318	Brachytx isodose complex	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77321	Special telethx port plan	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77331	Special radiation dosimetry	S	5611	1.4810	\$129.41	S	5611	1.4795	\$129.28	-\$0.13	-0.1%				
77332	Radiation treatment aid(s)	S	5611	1.4810	\$129.41	S	5611	1.4795	\$129.28	-\$0.13	-0.1%				
77333	Radiation treatment aid(s)	S	5611	1.4810	\$129.41	S	5611	1.4795	\$129.28	-\$0.13	-0.1%				
77334	Radiation treatment aid(s)	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77336	Radiation physics consult	S	5611	1.4810	\$129.41	S	5611	1.4795	\$129.28	-\$0.13	-0.1%				
77338	Design mlc device for imrt	S	5612	4.0330	\$352.41	S	5612	4.0289	\$352.05	-\$0.36	-0.1%				
77370	Radiation physics consult	S	5611	1.4810	\$129.41	S	5611	1.4795	\$129.28	-\$0.13	-0.1%				
77371	Srs multisource	J1	5627	84.9988	\$7,427.37	J1	5627	84.9104	\$7,419.64	-\$7.73	-0.1%				
77372	Srs linear based	J1	5627	84.9988	\$7,427.37	J1	5627	84.9104	\$7,419.64	-\$7.73	-0.1%				
77373	Sbrt delivery	S	5626	19.4764	\$1,701.89	S	5626	19.4562	\$1,700.12	-\$1.77	-0.1%				
77385	Ntsty modul rad tx dlvr smpl	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77386	Ntsty modul rad tx dlvr cplx	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77401	Radiation treatment delivery	S	5621	1.3089	\$114.37	S	5621	1.3075	\$114.25	-\$0.12	-0.1%				
77402	Radiation treatment delivery	S	5621	1.3089	\$114.37	S	5621	1.3075	\$114.25	-\$0.12	-0.1%				
77407	Radiation treatment delivery	S	5622	2.9334	\$256.33	S	5622	2.9304	\$256.06	-\$0.27	-0.1%				
77412	Radiation treatment delivery	S	5622	2.9334	\$256.33	S	5622	2.9304	\$256.06	-\$0.27	-0.1%				
77470	Special radiation treatment	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77520	Proton trmt simple w/o comp	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77522	Proton trmt simple w/comp	S	5625	15.4840	\$1,353.02	S	5625	15.4680	\$1,351.62	-\$1.40	-0.1%				
77523	Proton trmt intermediate	S	5625	15.4840	\$1,353.02	S	5625	15.4680	\$1,351.62	-\$1.40	-0.1%				
77525	Proton treatment complex	S	5625	15.4840	\$1,353.02	S	5625	15.4680	\$1,351.62	-\$1.40	-0.1%				
77600	Hyperthermia treatment	S	5622	2.9334	\$256.33	S	5622	2.9304	\$256.06	-\$0.27	-0.1%				
77605	Hyperthermia treatment	S	5624	7.8259	\$683.84	S	5624	7.8177	\$683.13	-\$0.71	-0.1%				
77610	Hyperthermia treatment	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77615	Hyperthermia treatment	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77620	Hyperthermia treatment	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77750	Infuse radioactive materials	S	5622	2.9334	\$256.33	S	5622	2.9304	\$256.06	-\$0.27	-0.1%				
77761	Apply intrcav radiat simple	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77762	Apply intrcav radiat interm	S	5623	6.4252	\$561.45	S	5623	6.4186	\$560.87	-\$0.58	-0.1%				
77763	Apply intrcav radiat compl	S	5624	7.8259	\$683.84	S	5624	7.8177	\$683.13	-\$0.71	-0.1%				
77767	Hdr rdnc skn surf brachytx	S	5622	2.9334	\$256.33	S	5622	2.9304	\$256.06	-\$0.27	-0.1%				
77768	Hdr rdnc skn surf brachytx	S	5622	2.9334	\$256.33	S	5622	2.9304	\$256.06	-\$0.27	-0.1%				
77770	Hdr rdnc ntrst/icav brchtx	S	5624	7.8259	\$683.84	S	5624	7.8177	\$683.13	-\$0.71	-0.1%				
77771	Hdr rdnc ntrst/icav brchtx	S	5624	7.8259	\$683.84	S	5624	7.8177	\$683.13	-\$0.71	-0.1%				
77772	Hdr rdnc ntrst/icav brchtx	S	5624	7.8259	\$683.84	S	5624	7.8177	\$683.13	-\$0.71	-0.1%				
77778	Apply interstit radiat compl	S	5624	7.8259	\$683.84	S	5624	7.8177	\$683.13	-\$0.71	-0.1%				
77789	Apply surf ldr radionuclide	S	5621	1.3089	\$114.37	S	5621	1.3075	\$114.25	-\$0.12	-0.1%				