

CMS 2021 Final Ruling Summary: Cardiac PET, MPFS, & HOPPS



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Medicare Physician Fee Schedule FINAL Rule effective Jan 1, 2021

On December 1, 2020, the Centers for Medicare & Medicaid Services (CMS) posted the final rule for Medicare payments under the Physician Fee Schedule (PFS), and other Medicare Part B issues for the calendar year (CY) 2021. With the budget neutrality adjustment to account for changes in relative value units (RVUs), as required by law, the final CY 2021 PFS conversion factor is \$34.89, a decrease of \$1.20 from the current 2020 PFS conversion factor of \$36.09.

CMS also proposed changes to the direct practice expense inputs for several codes associated with Myocardial PET services. Stakeholders provided input regarding these changes that would impact CPT codes 78432, 78459, 78491, and 78492. The technical components for these CPT codes are all contractor priced so there will be no change to the national pricing of these codes for 2021. RVUs for the professional component (-26) of the myocardial imaging PET studies will remain flat with the only fluctuation in physician payment for these CPT codes corresponding to the changes associated with the conversion factor. In addition, myocardial perfusion imaging agents will continue to be contractor priced in the non-facility (office).

Code	Description
78432	Myocardial imaging, PET, combined perfusion with metabolic evaluation study (including ventricular wall motion[s], and/or ejection fraction[s], when performed), dual radiotracer (eg, myocardial viability)
78459	Myocardial imaging, PET, metabolic evaluation study (including ventricular wall motion[s], and/or ejection fraction[s], when performed), single study
78491	Myocardial imaging, PET, perfusion study (including ventricular wall motion[s], and/or ejection fraction[s], when performed); single study, at rest or stress (exercise or pharmacologic)
78492	Multiple studies at rest and stress (exercise or pharmacologic)

Additionally, CMS finalized the removal of six National Coverage Determinations (NCDs) including NCD 220.2.1 Magnetic Resonance Spectroscopy and NCD 220.6.16 FDG PET for Inflammation and Infection. Local Medicare contractors will determine coverage under section 1862(a)(1) of the Act for those specific items or services previously addressed through the NCDs. These NCDs will be removed effective January 1, 2021, however, the changes in coverage require an implementation process in order to make required changes in manual guidance as well as coding/coverage/payment Medicare system edits. While it typically takes a number of months to implement a change in coverage, claims will be adjudicated appropriately, retroactive if necessary, to the effective date of the final rule, January 1, 2021.

CMS finalized the proposal to add more than 60 services to the Medicare telehealth list. These additions allow beneficiaries in rural areas who are in a medical facility (nursing home) to continue to have access to telehealth services such as certain types of emergency visits, therapy services, and critical care services. Medicare does not have the statutory authority to pay for telehealth to beneficiaries outside rural areas or allow beneficiaries to receive telehealth in their home. However, this is an Important step for Medicare beneficiaries in rural areas to have more convenient access to healthcare.



Payment rates reflect the Medicare national average payment rates

ACTUAL rates for 2020 and FINAL for 2021

*MPFS rates based upon the 2021 conversion factor = \$34.8931

CPT	DESCRIPTOR	Physician Global Fee	2021 FINAL*
78451	Myocardial perfusion imaging, tomographic (SPECT) (including attenuation correction, qualitative or quantitative wall motion, ejection fraction by first pass or gated technique, additional quantification, when performed); single study, at rest or stress (exercise or pharmacologic)	\$347.54	\$349.28
78452	Myocardial perfusion imaging, tomographic (SPECT) (including attenuation correction, qualitative or quantitative wall motion, ejection fraction by first pass or gated technique, additional quantification, when performed); multiple studies, at rest and /or stress (exercise or pharmacologic) and/or redistribution and/or rest reinjection	\$484.68	\$486.41
78459	Myocardial imaging, positron emission tomography (PET), metabolic evaluation study (including ventricular wall motion(s) and/or ejection fraction(s), when performed, single study	Contractor Priced	Contractor Priced
78429	Myocardial imaging, PET, metabolic evaluation study (including ventricular wall motion(s) and/or ejection fraction(s), when performed, single study; with concurrently acquired CT transmission	Contractor Priced	Contractor Priced
78491	Myocardial imaging, PET, perfusion, single study at rest or stress including ventricular wall motion(s) and/or ejection fraction(s), when performed, single study, at rest or stress	Contractor Priced	Contractor Priced
78431	Myocardial imaging, PET, perfusion, single study at rest or stress Including ventricular wall motion(s) and/or ejection fraction(s), when performed, single study, at rest or stress; with concurrently acquired CT transmission	Contractor Priced	Contractor Priced
78492	Myocardial imaging, PET, perfusion, single study at rest or stress (including ventricular wall motion(s) and/or ejection fraction(s), when performed), multiple studies, at rest or stress	Contractor Priced	Contractor Priced
78432	Myocardial imaging, PET, combined perfusion with metabolic evaluation study (including ventricular wall motion(s) and/or ejection fraction(s), when performed), dual radiotracer (eg, myocardial viability)	Contractor Priced	Contractor Priced
78433	Myocardial imaging, PET, combined perfusion with metabolic evaluation study (including ventricular wall motion(s) and/or ejection fraction(s), when performed), dual radiotracer (eg, myocardial viability); with concurrently acquired CT transmission	Contractor Priced	Contractor Priced
78434	Absolute quantitation of myocardial blood flow (AWMBF) PET, rest and pharmacologic stress (list separately in addition to code for primary procedure)	Contractor Priced	Contractor Priced

Contractor Priced: No formal fee schedule payment has been established; coverage and payment are subject to the Medicare Administrative Contractor review process.

**PHYSICIAN OFFICE REIMBURSEMENT
FINAL 2021 CHANGES**

MYOCARDIAL PERFUSION IMAGING AGENTS			
CPT	DESCRIPTOR	Physician Global	2021 Physician Global FINAL*
A9500	Technetium Tc-99m sestamibi, diagnostic, <u>per study dose</u>	Contractor Priced	Contractor Priced
A9502	Technetium Tc-99m tetrofosmin, diagnostic, <u>per study dose</u>		
A9505	Thallium TI-201 thallos chloride, diagnostic, per millicurie		
A9552	Fluorodeoxyglucose F-18 FDG, diagnostic, per study, up to 45mci		
A9555	Rubidium Rb-82, diagnostic <u>per study dose</u> , up to 60 millicuries		

Contractor Priced: No formal fee schedule payment has been established; coverage and payment are subject to the Medicare Administrative Contractor review process.

STRESS TESTING			
CPT	DESCRIPTOR	2020 Physician Global Fee	2021 Physician Global FINAL*
93015	Cardiovascular stress test using maximal or submaximal treadmill or bicycle exercise, continuous electrocardiographic monitoring, and/or pharmacological stress; with supervision, interpretation and report	\$72.18	\$71.88
93016	Cardiovascular stress test using maximal or submaximal treadmill or bicycle exercise, continuous electrocardiographic monitoring, and/or pharmacological stress; supervision only, without interpretation and report	\$22.74	\$21.98
93017	Cardiovascular stress test using maximal or submaximal treadmill or bicycle exercise, continuous electrocardiographic monitoring, and/or pharmacological stress; tracing only, without interpretation and report	\$34.29	\$35.24
93018	Cardiovascular stress test using maximal or submaximal treadmill or bicycle exercise, continuous electrocardiographic monitoring, and/or pharmacological stress; interpretation and report only	\$15.16	\$14.66

STRESS TESTING IMAGING AGENTS			
CPT	DESCRIPTOR	Physician Global	2021 Global FINAL
J0153	Injection, adenosine, 1 mg	E	\$0.553
J1245	Injection, dipyridamole per 10 mg (Persantine IV)	E	\$3.364
J1250	Injection, dobutamine Hydrochloride, per 250 mg	E	\$7.191
J2785	Injection, regadenoson, 0.1 mg (Lexiscan)	E	\$59.372

E: Excluded from Physician Fee Schedule by regulation. No RVUs are shown, and no payment may be made under the fee schedule for these codes. Payment for them, when covered, generally continues under reasonable charge procedures. Payment is based upon Average Sales Price (ASP) fee schedule – updated quarterly by CMS



Hospital Outpatient and Ambulatory Surgery Center Final Rule

On December 2, The Centers for Medicare and Medical Services (CMS) released the final changes to Hospital Outpatient Prospective Payment and Ambulatory Surgical Center Payment Systems and Quality Reporting Programs; New Categories for Hospital Outpatient Department Prior Authorization Process; Clinical Laboratory Fee Schedule: Laboratory Date of Service Policy; Overall Hospital Quality Star Rating Methodology; and Physician-owned Hospitals. These changes will be implemented and will impact providers effective January 1, 2021.

CMS finalized an overall increase in OPPI rates by 2.4% for 2021. For Cardiac PET procedures, there are no proposed significant changes from CY 2020 to CY 2021. Procedure reimbursement will increase slightly based upon the overall OPPI increase. Separately reimbursed procedures and packaged procedures are proposed to remain as they are currently reimbursed.

Additional changes finalized include the continuation of the current 34B drug program which allows hospitals to purchase covered outpatient drugs at discounted prices. CMS had proposed changes to the program; however, the final rule maintains the current policy of paying ASP minus 22.5% for 340B acquired drugs.

CMS also finalized the proposal to begin eliminating the Inpatient Only (IPO) list of 1,700 procedures for which Medicare will only pay when performed in the hospital inpatient. Over the next 3 years CMS will begin to eliminate IPO procedures and the list will be completely phased out by CY 2024.

For reimbursement support for your facility please contact your Jubilant Radiopharma Sales Representative or email Jubilant@thepinnaclehealthgroup.com.



Payment rates reflect the Medicare national average payment rates

ACTUAL rates for 2020 and FINAL for 2021

*MPFS rates based upon the 2021 conversion factor = \$34.8931

Myocardial Perfusion Imaging					
CPT	DESCRIPTOR	2020	2021 FINAL	2020	*2021 FINAL
		OPPS		MPFS Professional	
78451	Myocardial perfusion imaging, tomographic (SPECT) (including attenuation correction, qualitative or quantitative wall motion, ejection fraction by first pass or gated technique, additional quantification, when performed); single study, at rest or stress (exercise or pharmacologic)	\$1,272.19	\$1,305.94	\$68.57	\$66.30
78452	Myocardial perfusion imaging, tomographic (SPECT) (including attenuation correction, qualitative or quantitative wall motion, ejection fraction by first pass or gated technique, additional quantification, when performed); multiple studies, at rest and /or stress (exercise or pharmacologic) and/or redistribution and/or rest reinjection	\$1,272.19	\$1,305.94	\$80.84	\$77.81
78459	Myocardial imaging, positron emission tomography (PET), metabolic evaluation study (including ventricular wall motion(s) and/or ejection fraction(s), single study	\$1,272.19	\$1,305.94	\$77.59	\$74.67
78429	Myocardial imaging, PET, metabolic evaluation study (including ventricular wall motion(s) and/or ejection fraction(s), when performed, single study; with concurrently acquired CT transmission	\$1,443.16	\$1,480.34	\$85.53	\$82.00
78491	Myocardial imaging, PET, perfusion, single study at rest or stress including ventricular wall motion(s) and/or ejection fraction(s), single study, at rest or stress	\$1,443.16	\$1,480.34	\$75.43	\$72.23
78430	Myocardial imaging, PET, perfusion study (including ventricular wall motion[s] and/or ejection fraction[s], when performed); single study, at rest or stress (exercise or pharmacologic), with concurrently acquired computed tomography transmission scan	\$1,443.16	\$1,480.34	\$81.20	\$77.81
78431	Myocardial imaging, PET, perfusion, single study at rest or stress including ventricular wall motion(s) and/or ejection fraction(s), when performed, single study, at rest or stress; with concurrently acquired CT transmission	\$2,250.50	\$2,250.50	\$94.55	\$90.37
78492	Myocardial imaging, PET, perfusion, single study at rest or stress (including ventricular wall motion(s) and/or ejection fraction(s), when performed), multiple studies, at rest or stress	\$1,443.16	\$1,480.34	\$88.78	\$85.49
78432	Myocardial imaging, PET, combined perfusion with metabolic evaluation study (including ventricular wall motion(s) and/or ejection fraction(s), when performed), dual radiotracer (eg, myocardial viability)	\$2,750.50	\$2,750.50	\$100.69	\$96.30
78433	Myocardial imaging, PET, combined perfusion with metabolic evaluation study (including ventricular wall motion(s) and/or ejection fraction(s), when performed), dual radiotracer (eg, myocardial viability); with concurrently acquired CT transmission	\$2,750.50	\$2,750.50	\$110.07	\$104.68
78434	Absolute quantitation of myocardial blood flow (AWMBF) PET, rest and pharmacologic stress (list separately in addition to code for primary procedure)	Packaged	Packaged	\$31.76	\$30.36



HOSPITAL OUTPATIENT REIMBURSEMENT

FINAL 2021 CHANGES

MYOCARDIAL PERFUSION IMAGING AGENTS				
CPT	DESCRIPTOR	SI**	Payment	*2021 FINAL
A9500	Technetium Tc-99m sestamibi, diagnostic, <u>per study dose</u>	N	Packaged	Packaged
A9502	Technetium Tc-99m tetrofosmin, diagnostic, <u>per study dose</u>	N	Packaged	Packaged
A9505	Thallium Tl-201 thallos chloride, diagnostic, per mCi	N	Packaged	Packaged
A9552	Fluorodeoxyglucose F-18 FDG, diagnostic, per study dose, up to 45 mCi	N	Packaged	Packaged
A9555	Rubidium Rb-82, diagnostic <u>per study dose</u> , up to 60 mCi	N	Packaged	Packaged
Q9969	Tc-99m from nonhighly enriched uranium source, per study dose	K	\$10.00	\$10.00

Status Indicator **N: Items and Services Packaged with primary procedure

Status Indicator **K: Nonpass-Through Drugs, Including Therapeutic Radiopharmaceuticals; Paid under OPPS; separate APC payment

STRESS TESTING						
CPT	DESCRIPTOR	SI**	Hospital Outpatient	2021 FINAL	Physician Professional	*2021 FINAL
93015	Cardiovascular stress test using maximal or submaximal treadmill or bicycle exercise, continuous electrocardiographic monitoring, and/or pharmacological stress; with supervision, interpretation and report	B	N/A	N/A	\$72.18	\$71.88
93016	Cardiovascular stress test using maximal or submaximal treadmill or bicycle exercise, continuous electrocardiographic monitoring, and/or pharmacological stress; supervision only, without interpretation and report	B	N/A	N/A	\$22.74	\$21.98
93017	Cardiovascular stress test using maximal or submaximal treadmill or bicycle exercise, continuous electrocardiographic monitoring, and/or pharmacological stress; tracing only, without interpretation and report	Q1	\$253.10	\$264.45	\$34.29	\$35.24
93018	Cardiovascular stress test using maximal or submaximal treadmill or bicycle exercise, continuous electrocardiographic monitoring, and/or pharmacological stress; interpretation and report only	B	N/A	N/A	\$15.16	\$14.66

Status Indicator **B: Not paid in this setting

Status Indicator **Q1: Payment packaged if performed with another procedure; otherwise separate payment

STRESS TESTING IMAGING AGENTS			
CPT	DESCRIPTOR	SI**	2021
J0153	Injection, adenosine, 1 mg (not to be used to report any adenosine phosphate compounds)	N	Packaged
J1245	Injection, dipyridamole per 10 mg (Persantine IV)	N	Packaged
J1250	Injection, dobutamine Hydrochloride, per 250 mg	N	Packaged
J2785	Injection, regadenoson, 0.1 mg (Lexiscan)	N	Packaged