

AAPM Submits Joint Comment Letter to CMS Advisory Panel

The AAPM recently submitted a joint comment letter with ACR, ASTRO and ABS to the CMS Hospital Outpatient Payment (HOP) Advisory Panel. AAPM remains concerned that the current Comprehensive APC (C-APC) methodology lacks the appropriate charge capture mechanisms. The letter states, "the recent experience with bundling related to the stereotactic radiosurgery comprehensive APC has been unnecessarily complex

and has clearly caused both confusion and inaccuracy in coding for stereotactic radiosurgery procedures." The letter recommends that CMS should convene stakeholders in 2016 to discuss the goals of this C-APC process and develop recommendations as to how those goals could realistically be achieved. To review the joint comment letter click [here](#).