

## AAPM PRESENTS TO HOSPITAL OUTPATIENT PAYMENT ADVISORY PANEL

AAPM Professional Economics Committee (PEC) members James Goodwin and Samuel Einstein presented recommendations to the Hospital Outpatient Payment (HOP) Advisory Panel on August 22 regarding reassignment of CPT 76145 *Medical physics dose evaluation for radiation exposure that exceeds institutional review threshold, including report* to a higher paying Ambulatory Payment Classification (APC) group. The HOP Advisory Panel advises the Centers for Medicare and Medicaid Services (CMS) concerning the clinical integrity of the APC groups and their associated weights. Recommendations from the HOP Advisory Panel are considered by CMS and addressed in the 2023 Hospital Outpatient Prospective Payment System (HOPPS) final rule that is published by November 1, 2022.

Effective January 1, 2023, CMS proposes to maintain assignment of the medical physics code 76145 to APC 5612 *Level 2 Therapeutic Radiation Treatment Preparation* with a 2023 proposed payment of \$365.15. APC 5612 includes ten radiation oncology codes. The AAPM contends that CPT 76145 is not a radiation oncology code used for treatment preparation of cancer patients. The new imaging physics code is used subsequent to an interventional radiology or interventional cardiology procedure.

AAPM recommended that CMS reassign CPT 76145 to APC 5724 *Level 4 Diagnostic Tests and Related Services*. APC 5724 currently has 18 services that vary by clinical specialty. The proposed 2023 payment for APC 5724 is \$952.52. The resource consumption in APC 5724 more closely aligns with the resources used to perform CPT 76145. Alternatively, AAPM recommended reassignment of CPT 76145 to APC 1510 *New Technology Level 10 (\$801-\$900)*, which more closely aligns reimbursement to the current 2022 Medicare Physician Fee Schedule payment rate of \$832.97. Assignment to a New Technology APC allows CMS time to collect and analyze outpatient claims data for more appropriate assignment to a clinical APC in 2–3 years.

HOP Advisory Panel members had concerns regarding the lack of 2021 outpatient claims data used for 2023 rate setting. The Panel ultimately recommended that CPT 76145 be put in a New Technology APC that equates to the current HOPPS reimbursement.

The AAPM will submit comments regarding the 2023 HOPPS proposed rule to CMS prior to September 13 deadline.