

## AAPM SUBMIT COMMENTS TO CMS REGARDING 2024 MEDICARE PROPOSED RULES

AAPM recently submitted three comment letters to the Centers for Medicare and Medicaid Services (CMS) regarding the 2024 Medicare proposed rules.

Of note, CMS is proposing the adoption of a new quality measure for Excessive Radiation Dose or Inadequate Image Quality for Diagnostic Computed Tomography (CT) in Adults. The proposed measure would apply to both hospital and physician reporting. AAPM urged CMS not to adopt the quality measure as proposed, as the quality measure lacks national consensus of stakeholders and practitioners and further has significant scientific limitations that will impact its safety and practical value. The comments stated that the limitations will decrease the measure's overall likelihood of clinical impact and may even negatively impact image quality, patient safety, and patient outcomes. Further, this measure would disproportionately burden hospitals serving a low-income population (e.g., rural and inner-city hospitals) due to their older equipment and lack of in-house physicists. AAPM noted that they would like to work with CMS and interested and affected parties to improve and revise the proposed quality measure prior to implementation. AAPM invited CMS staff to participate in a Quality Measures Roundtable to be held on October 20, 2023 at AAPM headquarters in Alexandria, VA.

In addition, CMS solicited public comment on potential modifications to the current packaging policy for diagnostic radiopharmaceuticals. AAPM recommended that CMS pay separately for diagnostic radiopharmaceuticals with per-day costs above the hospital outpatient drug packaging threshold of \$140 effective January 1, 2024. AAPM encouraged CMS to adopt an average sales price (ASP) + 6% payment policy for diagnostic radiopharmaceuticals.

For additional detail, you may review the comment letters at:

[https://www.aapm.org/government\\_affairs/CMS/2024HealthPolicyUpdate.asp](https://www.aapm.org/government_affairs/CMS/2024HealthPolicyUpdate.asp)