

CMS Proposed Fee Schedule

CMS has issued the proposed fee schedule for 2021 for review and comment. There are several elements that will have a significant impact. Most importantly, a proposed adjustment downwards on the conversion factor to maintain budget neutrality while increasing reimbursement to primary care, some changes in Telehealth & E/M coding and an extension of the testing period for Appropriate Use Criteria (AUC).

- Conversion Factor: This is the value assigned per RVU (relative value unit). Each CPT has a specific number of RVUs assigned, and therefore the conversion factor directly impacts reimbursement.

Change: Proposed value = \$32.36 v. \$36.09 in the current fee schedule. A reduction of \$3.83/RVU.

- Impact to your practice:
 - Anesthesiology - 8%
 - Cardiology +1%
 - Family Practice +13%
 - Internal Medicine +4%
 - Pathology - 9%
 - Radiology:
 - Diagnostic -11%
 - Interventional - 9%
 - Nuclear Med - 8%
 - Radiation Oncology -6%
& radiation therapy
- AUC- CMS has extended the testing period for this program through 2021. Payment for claims will not be impacted. However we recommend that providers use this additional time to prepare.
- E/M Proposed Changes:
 - Removal of new patient level 1 visit- 99201
 - Increased RVUs for E/M services
 - Making a modification to the framework from the use of history and exam, to medical decision making or total time spent with the patient. This compliments the documentation changes already approved in the final rule for 2020 and set to begin in 2021.
- Medicare Telehealth Services:
 - Adding 9 services permanently
 - Adding 13 services temporarily. This is in response to the COVID-19 PHE & they will extend to the end of the calendar year in which the COVID-19 PHE ends.

This is only a proposed rule. The comment period is open until 10/5/2020 and anyone can add a comment. Several organizations will be making comments. You may add your comment(s) on the regulations [page](#), and click the “Comment” button on the top left side of the page To see more detailed information on this and the additional QPP changes you can find the rule [here](#).