

Issue Brief

FEDERAL ISSUE BRIEF • MARCH 23, 2015

KEY POINTS

Changes include:

- reducing the conversion factors used to set rates
- calculation of relative value units
- individual quality measure updates

CMS Makes Corrections to the CY 2015 Physician Update

The Centers for Medicare & Medicaid Services has issued a rule which corrects technical errors that appeared in the Nov. 13, 2014 final rule regarding “Revisions to Payment Policies under the Physician Fee Schedule, Clinical Laboratory Fee Schedule, Access to Identifiable Data for the Center for Medicare and Medicaid Innovation Models & Other Revisions to Part B for CY 2015.” The rule makes some 25 corrective actions.

The rule appears in the March 20 *Federal Register*. A copy of the 18 page document is at: <http://www.gpo.gov/fdsys/pkg/FR-2015-03-20/pdf/2015-06427.pdf>.

The corrections are effective Jan 1, 2015.

The published conversion factors have been revised slightly lower as follows.

- The calendar year 2015 PFS CF for Jan. 1, 2015 through March 31, 2015 is \$35.7547 (was \$35.8013).
- The CY 2015 PFS CF for April 1, 2015 through Dec. 31, 2015 is \$28.1872 (was \$28.2239).
- The CY 2015 national average anesthesia CF for Jan. 1, 2015 through March 31, 2015 is \$22.4968 (was \$22.5550).

- The CY 2015 national average anesthesia CF for April 1, 2015 through December 31, 2015 is \$17.7454 (was \$17.7913).

CMS has corrected Addenda B and C. These items are available on the CMS website at: <http://www.cms.gov/physicianfeesched/>.

CORRECTION OF ERRORS

1. On page 67559, in Table 4: Calculation of PE RVUs Under Methodology for Selected Codes, the table is corrected.
2. On page 67562, in Table 8: Codes Affected by Removal of Film Inputs.
3. On page 67591, the lower gastrointestinal procedures, many of which are also listed in Appendix G is corrected.
4. On page 67612, in Table 14: Codes reviewed by the 2014 Multi-Specialty Refinement Panel, the entries for CPT codes 43204, 43205 and 43233 are corrected.
5. On page 67633 CPT code 41391 is corrected to read CPT code 43391.
6. On page 67636 the final work RVU for CPT code 43278 is 8.02.

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continued

7. On pages 67651 through 67663, in Table 25: CY 2015 Interim Final Work RVUS For New/Revised or Potentially Misvalued Codes, the listed entries on page 67658 are corrected.
8. On page 67660, in Table 25: CY 2015 Interim Final Work RVUS For New/Revised or Potentially Misvalued Codes, the listed entry is corrected.
9. On page 67668:
 - first column, line 1, the title (13) Breast Tomosynthesis (CPT codes 77061, 77062, and 77063) is corrected
 - second column, line 19, the phrase a new code, G-2079 is corrected
 - second column, line 27, is corrected
10. On page 67669, second column, lines 8 through 11 are corrected.
11. On page 67671, in Table 28: CY 2015 Interim Final Codes with Direct PE Input Recommendations Accepted without Refinements is corrected.
12. On page 67673, in Table 29: Invoices Received for New Direct PE Inputs is corrected.
13. On page 67674, Table 30: Invoices Received for Existing Direct PE Inputs, the list entries for CPT code 31627 is corrected.
14. On pages 67678 through 67711, in Table 31: CY 2015 Interim Final Codes With Direct PE Input Recommendations Accepted with Refinements is corrected.
15. On page 67726, first column, second full paragraph, lines 6 through 8, the phrase “with a clarification that practitioners do not have to use any specific content exchange standard in CY 2015” is corrected.
16. Nineteen conversion factor corrections – see above.
17. On page 67742, third column, first partial paragraph:
 - line 3, the phrase “by 0.06 percent” is corrected to read “by 0.19 percent”
 - third column, first full paragraph, line 8, the figure \$35.8013 is corrected to read \$35.7547
 - third column, second full paragraph, line 6, the figure \$28.2239 is corrected to read \$28.1872
 - third column, second full paragraph, line 9, the phrase 21.2 percent is corrected to read 21.3 percent
18. On page 67742, in Table 45: Calculation of the CY 2015 PFS CF, the table is corrected.
19. On page 67743:
 - first column, first full paragraph, line 5, the sentence “After applying the 0.9994 budget” is corrected to read, “After applying the 0.9981 budget”
 - second column, line 2, the figure \$22.5550 is corrected to read \$22.4968
 - third column, line 12, the figure \$17.7913 is corrected to read \$17.7454
 - table 46: Calculation of the CY 2015 Anesthesia CF is corrected
20. On page 67803, last row, in Table 52: Individual Quality Cross-Cutting Measures for the PQRS to Be Available for Satisfactory Reporting Via Claims, Registry, and EHR Beginning in 2015, the listed entry is corrected.

21. On page 67848, the last two rows, and the first row on page 67849, in Table 55: Measures Being Removed from the Existing PQRS Measure Set Beginning in 2015 is corrected.
22. On page 67854, the second row, in Table 56: Existing Individual Quality Measures and Those Included in Measures Groups for the PQRS for Which Measure Reporting Updates Will Be Effective Beginning in 2015 is corrected.
23. On page 67877, second row, in Table 56: Existing Individual Quality Measures and Those Included in Measures Groups for the PQRS for Which Measure Reporting Updates Will Be Effective Beginning in 2015 is corrected.
24. On page 67988, in Table 93: CY 2015 PFS Final Rule with Comment Period Estimated Impact Table: Impacts of Work, Practice Expense, and Malpractice RVUs, the table is corrected.
25. On page 67991 through 67992, in Table 94: Impact of Final Rule with Comment Period on CY 2015 Payment for Selected Procedures, the table is corrected.

*Analysis provided for MHA
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