

Centers for Medicare & Medicaid Services Proposed Medicare Hospital Outpatient Payment Rates and Policies for CY 2023

On July 13th, the Centers for Medicare & Medicaid Services (CMS) released a [proposed rule](#) updating Medicare payment rates and policies under the hospital outpatient prospective payment system (OPPS) and the ambulatory surgical center payment system for calendar year (CY) 2024. CMS proposes to increase all payment rates under the OPPS hospital outpatient department fee schedule by 2.8 percent, which is based on the most recent updated cost reports and claims data available for the CY 2024 OPPS ratesetting. **Comments are due to CMS on September 11, 2023.**

Proposed Payment Policies and Rates for Transfusion Medicine and Cellular Therapies

Consistent with the longstanding methodology used since 2005, CMS proposes to continue establishing separate payment rates for blood and blood products using a blood-specific cost-to-charge ratio (CCR) methodology, which uses actual or simulated CCRs from the most recently available hospital cost reports to convert hospital charges for blood and blood products to costs. CMS proposes to continue applying the blood-specific CCR methodology when calculating the costs of blood and blood products that appear on claims with services assigned to comprehensive ambulatory payment classifications (C-APCs). A C-APC is “a classification for the provision of a primary service and all adjunctive services provided to support the delivery of the primary service.” Since the costs of blood and blood products are reflected in the overall costs of the C-APCs and the proposed payment rates of the C-APCs, CMS is proposing not to make separate payments for blood and blood products when they appear on the same claims as services assigned to the C-APCs.

CMS proposes to decrease payment rates for the majority of blood products. In CY 2023, as a result of the COVID–19 public health emergency (PHE) and concerns around incomplete claims data for CY 2020, CMS established payment rates using CY 2021 claims data and CY 2019 cost report data. Therefore, the CY 2023 payment rates did not reflect cost report data submitted during the pandemic. However, for CY 2024, CMS proposes to establish payment rates using its regular process, and therefore uses CY 2022 claims and cost report data to calculate the payment rates. AABB is continuing to analyze the proposed payment rates. Please see Tables 1 and 2 for the proposed payment rates for blood and blood products and transfusion, apheresis, and stem cell procedures.

As summarized in Table 3, CMS proposes to increase the payment rates for most transfusion and laboratory services covered by the OPPS. Decreases in payment rates were seen for HCPCS codes 86930 (frozen blood prep), 86931 (frozen blood thaw), and 86917 (red blood cell incubation with enzymes). Please see Table 3 for a summary of the proposed payment rates for transfusion laboratory services.

Table 4 summarizes the proposed payment rates for chimeric antigen receptor therapy (CAR-T) cell therapies. In the proposed rule, CMS noted that there were recommendations made by commenters in CY 2023 for CMS to revise the OPPS revenue code-to-cost center crosswalk to provide consistency with the National Uniform Billing Committee (NUBC) definitions and to improve the accuracy of cost data for ratesetting for CAR T-cell administration services. CMS analyzed the impact of the recommendation and determined that the revisions would more accurately account for CAR T-cell costs, specifically with CAR-T-related revenue codes that were not previously assigned cost centers. Thus, for CY 2024, CMS proposes to adopt revisions to the impacted revenue codes and the code-to-cost center crosswalk.

Request for Public Comment: Potential Payments for Establishing and Maintaining Access to Essential Medicines

CMS seeks comments on establishing additional payments to hospitals for maintaining access to essential medicines. CMS cites the persistence and severity of shortages for critical medical products and the extra time, labor and resources hospitals spend to navigate these shortages. CMS expects that the resources required to establish and maintain access to a buffer stock of essential medicines will be greater than the resources required to establish and maintain access to these medicines without such a buffer stock. Therefore, CMS proposes a separate payment to hospitals under the Inpatient Prospective Payment System (IPPS) for establishing and maintaining access to a buffer stock of essential medicines.

"Essential medicines" would be defined as one of the eighty-six (86) medicines prioritized in the report "Essential Medicines Supply Chain and Manufacturing Resilience Assessment" as developed by the U.S. Department of Health and Human Services (HHS) Office of the Assistant Secretary for Preparedness and Response (ASPR). Notably, blood and blood products were not included in this exercise due to having a unique supply chain.

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If you have any feedback that you would like for AABB to consider or if you have any questions on the proposed rule, please email advocacy@aabb.org.

Table 1. Blood and Blood Products

HCPCS Code	Short Descriptor	2024 SI	2024 APC	Final 2023 Payment	Proposed CY 2024 Payment Rate	\$ Change 2023-2024	% Change 2023-2024	
P9010	Whole blood for transfusion	R	9510	\$227.61	\$201.45	-\$26.16	-11.5%	
P9011	Blood split unit	R	9520	\$139.05	\$150.27	\$11.22	8.1%	
P9012	Cryoprecipitate each unit	R	9511	\$74.39	\$67.72	-\$6.67	-9.0%	
P9016	Rbc leukocytes reduced	R	9512	\$189.21	\$181.75	-\$7.46	-3.9%	
P9017	Plasma 1 donor frz w/in 8 hr	R	9508	\$85.47	\$66.32	-\$19.15	-22.4%	
P9019	Platelets, each unit	R	9515	\$77.23	\$63.06	-\$14.17	-18.3%	
P9020	Platelet rich plasma unit	R	9516	\$445.27	\$534.04	\$88.77	19.9%	
P9021	Red blood cells unit	R	9517	\$135.52	\$133.01	-\$2.51	-1.9%	
P9022	Washed red blood cells unit	R	9518	\$395.78	\$382.67	-\$13.11	-3.3%	
P9023	Frozen plasma, pooled, sd	R	9509	\$93.03	\$61.80	-\$31.23	-33.6%	
P9025	Plasma cryo redu path each	R	9538	\$65.23	\$66.32	\$1.09	1.7%	
P9026	Cryo fib comp path redu each	R	9539	\$79.29	\$80.61	\$1.32	1.7%	
P9031	Platelets leukocytes reduced	R	9538	\$130.89	\$124.64	-\$6.25	-4.8%	
P9032	Platelets, irradiated	R	9539	\$143.80	\$139.77	-\$4.03	-2.8%	
P9033	Platelets leukoreduced irradi	R	9526	\$268.36	\$230.12	-\$38.24	-14.2%	
P9034	Platelets, pheresis	R	9500	\$333.97	\$316.23	-\$17.74	-5.3%	
P9035	Platelet pheres leukoreduced	R	9521	\$485.66	\$474.91	-\$10.75	-2.2%	
P9036	Platelet pheresis irradiated	R	9507	\$616.68	\$565.85	-\$50.83	-8.2%	
P9037	Plate pheres leukoredu irradi	R	9501	\$638.19	\$664.15	\$25.96	4.1%	
P9038	Rbc irradiated	R	9502	\$196.20	\$215.71	\$19.51	9.9%	
P9039	Rbc deglycerolized	R	9530	\$413.23	\$293.51	-\$119.72	-29.0%	
P9040	Rbc leukoreduced irradiated	R	9505	\$259.12	\$254.61	-\$4.51	-1.7%	
P9043	Plasma protein fract,5%,50ml	R	9504	\$7.94	\$8.08	\$0.14	1.8%	
P9044	Cryoprecipitatereducedplasma	R	9522	\$68.90	\$69.05	\$0.15	0.2%	
P9048	Plasmaprotein fract,5%,250ml	R	9514	\$158.36	\$69.81	-\$88.55	-55.9%	
P9050	Granulocytes, pheresis unit	E2	Not paid by Medicare when submitted on outpatient claims (any outpatient bill type).					
P9051	Blood, l/r, cmv-neg	R	9524	\$196.43	\$170.52	-\$25.91	-13.2%	
P9052	Platelets, hla-m, l/r, unit	R	9525	\$828.56	\$752.48	-\$76.08	-9.2%	
P9053	Plt, pher, l/r cmv-neg, irr	R	9531	\$532.45	\$523.37	-\$9.08	-1.7%	
P9054	Blood, l/r, froz/degly/wash	R	9527	\$296.88	\$222.36	-\$74.52	-25.1%	
P9055	Plt, aph/pher, l/r, cmv-neg	R	9528	\$333.62	\$241.96	-\$91.66	-27.5%	
P9056	Blood, l/r, irradiated	R	9529	\$108.72	\$87.96	-\$20.76	-19.1%	
P9057	Rbc, frz/deg/wsh, l/r, irradi	R	9532	\$393.84	\$374.93	-\$18.91	-4.8%	
P9058	Rbc, l/r, cmv-neg, irradi	R	9533	\$250.99	\$246.30	-\$4.69	-1.9%	
P9059	Plasma, frz between 8-24hour	R	9513	\$76.20	\$73.96	-\$2.24	-2.9%	
P9060	Fr frz plasma donor retested	R	9503	\$54.74	\$59.08	\$4.34	7.9%	

Table 1 (continued). Blood and Blood Products

HCPCS Code	Short Descriptor	2024 SI	2024 APC	Final 2023 Payment	Proposed CY 2024 Payment Rate	\$ Change 2023-2024	% Change 2023-2024
P9070	Pathogen reduced plasma pool	R	9534	\$73.01	\$32.58	-\$40.43	-55.4%
P9071	Pathogen reduced plasma sing	R	9535	\$88.91	\$250.78	\$161.87	182.1%
P9073	Platelets pheresis path redu	R	9536	\$577.89	\$559.75	-\$18.14	-3.1%
P9099	Blood component/product noc	R	9537	\$54.74	\$32.58	-\$22.16	-40.5%
C9507	COVID-19 convalescent plasma	R	9540	\$729.81	\$407.33	-\$322.48	-44.2%

Table 2. Transfusion, Apheresis, and Stem Cell Procedures

HCPCS Code	Short Descriptor	2024 SI	2024 APC	Final 2023 Payment	Proposed CY 2024 Payment Rate	\$ Change 2023-2024	% Change 2023-2024
36430	Blood transfusion service	S	5241	\$407.75	\$417.32	\$9.57	2.3%
36440	Bl push transfuse 2 yr/<	S	5241	\$407.75	\$417.32	\$9.57	2.3%
36450	Bl exchange/transfuse nb	S	5241	\$407.75	\$417.32	\$9.57	2.3%
36455	Bl exchange/transfuse non-nb	S	5241	\$407.75	\$417.32	\$9.57	2.3%
36456	Prtl exchange transfuse nb	S	5241	\$407.75	\$417.32	\$9.57	2.3%
36460	Transfusion service fetal	S	5241	\$407.75	\$417.32	\$9.57	2.3%
36511	Apheresis wbc	S	5242	\$1,359.84	\$1,474.76	\$114.92	8.5%
36512	Apheresis rbc	S	5242	\$1,359.84	\$1,474.76	\$114.92	8.5%
36513	Apheresis platelets	S	5241	\$407.75	\$417.32	\$9.57	2.3%
36514	Apheresis plasma	S	5242	\$1,359.84	\$1,474.76	\$114.92	8.5%
36516	Apheresis immunoads slctv	S	5243	\$4,160.00	\$4,336.16	\$176.16	4.2%
36522	Photopheresis	S	5243	\$4,160.00	\$4,336.16	\$176.16	4.2%
38205	Harvest allogeneic stem cell	B	Not paid under OPSS				
38206	Harvest auto stem cells	S	5242	\$1,359.84	\$1,474.76	\$114.92	8.5%
38207	Cryopreserve stem cells	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38208	Thaw preserved stem cells	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38209	Wash harvest stem cells	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38210	T-cell depletion of harvest	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38211	Tumor cell deplete of harvest	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38212	Rbc depletion of harvest	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38213	Platelet deplete of harvest	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38214	Volume deplete of harvest	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38215	Harvest stem cell concentrate	S	5241	\$407.75	\$417.32	\$9.57	2.3%
38220	Dx bone marrow aspirations	J1	5072	\$1,499.55	\$1,553.27	\$53.72	3.6%
38221	Dx bone marrow biopsies	J1	5072	\$1,499.55	\$1,553.27	\$53.72	3.6%
38222	Dx bone marrow bx & aspir	J1	5072	\$2,583.25	\$2,693.34	\$110.09	4.3%
38230	Bone marrow harvest allogeneic	S	5242	\$1,359.84	\$1,474.76	\$114.92	8.5%
38232	Bone marrow harvest autolog	S	5243	\$4,160.00	\$4,336.16	\$176.16	4.2%
38240	Transplnt allo hct/donor	J1	5244	\$42,233.40	\$52,758.91	\$10,525.51	24.9%
38241	Transplnt autol hct/donor	S	5242	\$1,359.84	\$1,474.76	\$114.92	8.5%
38242	Transplnt allo lymphocytes	S	5242	\$1,359.84	\$1,474.76	\$114.92	8.5%
38243	Transplnt hematopoietic boost	S	5242	\$1,359.84	\$1,474.76	\$114.92	8.5%
88184	Flowcytometry/ tc 1 marker	Q2	5673	\$324.11	\$344.60	\$20.49	6.3%
88185	Flowcytometry/tc add-on	N	Paid under OPSS; payment is packaged into payment for other services. Therefore, there is no separate APC payment.				
88187	Flowcytometry/read 2-8	B	Not paid under OPSS.				

Table 2 (continued). Transfusion, Apheresis, and Stem Cell Procedures

HCPCS Code	Short Descriptor	2024 SI	2024 APC	Final 2023 Payment	Proposed CY 2024 Payment Rate	\$ Change 2023-2024	% Change 2023-2024
88188	Flowcytometry/read 9-15	B				Not paid under OPSS.	
88189	Flowcytometry/read 16 & >	B				Not paid under OPSS.	

Table 3. Transfusion Laboratory Services

HCPCS Code	Short Descriptor	2024 SI	2024 APC	Final 2023 Payment	Proposed CY 2024 Payment Rate	\$ Change 2023-2024	% Change 2023-2024
86850	Rbc antibody screen	Q1	5671	\$50.14	\$52.34	\$2.20	4.4%
86860	Rbc antibody elution	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86870	Rbc antibody identification	Q2	5673	\$324.11	\$344.60	\$20.49	6.3%
86880	Coombs test direct	Q1	5733	\$57.48	\$58.13	\$0.65	1.1%
86885	Coombs test indirect qual	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86886	Coombs test indirect titer	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86890	Autologous blood process	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86891	Autologous blood op salvage	Q1	5674	\$776.51	\$820.95	\$44.44	5.7%
86900	Blood typing serologic abo	Q1	5734	\$116.11	\$123.02	\$6.91	6.0%
86901	Blood typing serologic rh(d)	Q1	5732	\$33.96	\$37.05	\$3.09	9.1%
86902	Blood type antigen donor ea	Q1	5673	\$324.11	\$344.60	\$20.49	6.3%
86904	Blood typing patient serum	Q1	5732	\$33.96	\$58.13	\$24.17	71.2%
86905	Blood typing rbc antigens	Q1	5673	\$324.11	\$344.60	\$20.49	6.3%
86906	Bld typing serologic rh phnt	Q1	5732	\$33.96	\$37.05	\$3.09	9.1%
86920	Compatibility test spin	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86921	Compatibility test incubate	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86922	Compatibility test antiglob	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86923	Compatibility test electric	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86927	Plasma fresh frozen	S	5672	\$157.25	\$165.41	\$8.16	5.2%
86930	Frozen blood prep	Q1	5673	\$324.11	\$165.41	-\$158.70	-49.0%
86931	Frozen blood thaw	Q1	5673	\$324.11	\$165.41	-\$158.70	-49.0%
86932	Frozen blood freeze/thaw	Q1	5732	\$33.96	\$37.05	\$3.09	9.1%
86945	Blood product/irradiation	Q1	5732	\$33.96	\$37.05	\$3.09	9.1%
86950	Leukocyte transfusion	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86960	Vol reduction of blood/prod	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86965	Pooling blood platelets	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86970	Rbc pretx incubatj w/chemical	Q1	5732	\$33.96	\$58.13	\$24.17	71.2%
86971	Rbc pretx incubatj w/enzymes	Q1	5673	\$324.11	\$165.41	-\$158.70	-49.0%
86972	Rbc pretx incubatj w/density	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86975	Rbc serum pretx incubj drugs	Q1	5735	\$377.57	\$382.43	\$4.86	1.3%
86976	Rbc serum pretx id dilution	Q1	5731	\$24.96	\$26.53	\$1.57	6.3%
86977	Rbc serum pretx incubj/inhib	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86978	Rbc pretreatment serum	Q1	5732	\$33.96	\$58.13	\$24.17	71.2%
86985	Split blood or products	Q1	5672	\$157.25	\$165.41	\$8.16	5.2%
86999	Transfusion procedure	Q1	5731	\$24.96	\$26.53	\$1.57	6.3%
P9100	Pathogen test for platelets	S	5733	\$57.48	\$58.13	\$0.65	1.1%

Table 4. CAR T-Cell Therapies

HCPCS Code	Short Descriptor	2024 SI	2024 APC	Final 2023 Payment	Proposed CY 2024 Payment Rate	\$ Change 2023-2024	% Change 2023-2024
Q2041	Axicabtagene ciloleucel car+	K	9035	\$422,884.770	\$449,245.861	\$26,361.09	6.2%
Q2042	Tisagenlecleucel car pos t	K	9194	\$453,856.598	\$468,441.501	\$14,584.90	3.2%
Q2053	Brexucabtagene car pos t	K	9391	\$422,940.000	\$448,752.402	\$25,812.40	6.1%
Q2054	Lisocabtagene maraleucel, car pos t	G	9413	\$434,918.000	\$434,918.000	\$0.00	0.0%
Q2055	Idecabtagene vicleucel car	G	9422	\$444,670.000	\$444,670.000	\$0.00	0.0%
Q2056	Ciltacabtagene car-pos t	G	9498	\$492,900.000	\$492,900.000	\$0.00	0.0%