

Centers for Medicare & Medicaid Services CY 2022 Medicare Hospital Outpatient Prospective Payment System (OPPS) Final Rule Summary

On November 1, the Centers for Medicare & Medicaid Services (CMS) released a [final 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) 2023. The final rule (1) updates payment policies and rates for CY 2023 and (2) establishes the payment rate for the blood not otherwise classified (NOC) HCPCS code P9099. **The final rule is effective on January 1, 2023.**

Payment Policies and Rates for Transfusion Medicine and Cellular Therapies

Consistent with the longstanding methodology used since 2005, CMS finalized the proposal to continue establishing separate payment rates for blood and blood products using their 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.

For CY 2023, CMS finalized the proposal to use the CY 2011 claims data to establish the OPPS rates for CY 2023. As detailed in the Tables below, CMS finalized 2023 payment rates and policies for all items and services furnished under OPPS, including blood products, transfusion, apheresis, stem cell procedures, and transfusion laboratory services.

Payment Policy for Blood Not Otherwise Classified (NOC) HCPCS Code P9099 (APC 9537)

On January 1, 2020, CMS established a new HCPCS code, P9099, to enable providers to bill for new blood products. CMS originally assigned P9099 to status indicator “E2” (Not payable by Medicare when submitted on an outpatient claim. In CY 2021, CMS recognized [concerns](#) from the blood community that assigning HCPCS code P9099 to a non-payable status in the OPPS meant that hospitals would not be able to be paid when they used new blood products since the claim lines billed with P9099 would be rejected by Medicare. Therefore, CMS finalized a proposal to make P9099 separately payable, assigning it a status indicator of “R” and the payment rate equal to the lowest paid separately payable blood product in the OPPS, which is P9043 (Infusion, plasma protein fraction [human], 5 percent, 50 ml), with a payment rate of \$7.79 per unit for CY 2021 and CY 2022.

For CY 2023, CMS proposed to continue to assign HCPCS code P9099 to APC 9537 (Blood component/product NOC) and changed the cross walked HCPCS code from P9043 to P9060 (fresh frozen plasma, donor retested, each unit). This resulted in a payment rate increase of \$7.79 to \$56.58. AABB, America’s Blood Centers and the American Red Cross submitted comments requesting that (1) change the status indicator assigned to HCPCS code P9099 to “F” to authorize A/B MACs to pay hospitals on the basis of reasonable cost; or (2) create temporary codes (Q-codes) for new blood products and adopt an expedited review of coding and payment policies for novel blood products. Unfortunately, CMS finalized a proposal to make P9099 separately payable, assigning it a status indicator of “R” and the payment rate equal to the lowest

paid separately payable blood product in the OPPS with claims data in CY 2021, which is P9060 with a payment rate of \$54.74 per unit.

However, the agency agreed with the blood community's suggestion to create temporary codes for new blood products, which can be assigned payment rates that "reasonably reflect the cost of the new blood products."

Chimeric Antigen Receptor T-cell (CAR-T) Therapy CPT Codes

In 2019, CMS finalized payment policy for CAR-T cell therapy and assigned the various steps required to harvest, collect, and prepare the genetically modified T-cells for administration to the CPT codes 0537T, 0538T, and 0539T with the status indicator "B" (Codes that are not recognized by OPPS when submitted on an outpatient hospital Part B bill type) to indicate that the services are not paid under the OPPS and are for tracking purposes only. CMS believes that payment for all these steps is included in the current HCPCS codes for the approved CAR T-cell therapies and does not pay separately for each step used to manufacture a drug or biological.

CMS did receive a request to revise the code-to-cost center crosswalk in order to map the CAR T-cell administration services revenue codes, which include cell collection, cell processing, and cell administration, to hospital cost centers in accordance with the National Uniform Billing Committee (NUBC) definitions and to improve the accuracy of cost data for OPPS rate setting for these services. CMS publishes a revenue code-to-cost center crosswalk with each OPPS rule and the NUBC is the standards maintenance organization for health care claims and revenue codes. CMS stated that they will explore the recommendations from the requestor and revisit the proposed changes in future rulemaking.

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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 final rule, please email advocacy@aabb.org.

Table 1. Blood and Blood Products

HCPCS Code	Short Descriptor	2023 SI	2023 APC	Final 2022 Payment	Final 2023 Payment Rate	\$ Change 2022-2023	% Change 2022-2023
P9010	Whole blood for transfusion	R	9510	\$153.17	\$227.61	\$74.44	48.6%
P9011	Blood split unit	R	9520	\$150.69	\$139.05	-\$11.64	-7.7%
P9012	Cryoprecipitate each unit	R	9511	\$81.53	\$74.39	-\$7.14	-8.8%
P9016	Rbc leukocytes reduced	R	9512	\$192.39	\$189.21	-\$3.18	-1.7%
P9017	Plasma 1 donor frz w/in 8 hr	R	9508	\$84.40	\$85.47	\$1.07	1.3%
P9019	Platelets, each unit	R	9515	\$72.79	\$77.23	\$4.44	6.1%
P9020	Platelet rich plasma unit	R	9516	\$204.20	\$445.27	\$241.07	118.1%
P9021	Red blood cells unit	R	9517	\$140.53	\$135.52	-\$5.01	-3.6%
P9022	Washed red blood cells unit	R	9518	\$387.85	\$395.78	\$7.93	2.0%
P9023	Frozen plasma, pooled, sd	R	9509	\$91.01	\$93.03	\$2.02	2.2%
P9031	Platelets leukocytes reduced	R	9538	\$67.08	\$65.23	-\$1.85	-2.8%
P9032	Platelets, irradiated	R	9539	\$81.53	\$79.29	-\$2.24	-2.7%
P9033	Platelets leukoreduced irradi	R	9526	\$153.07	\$130.89	-\$22.18	-14.5%
P9034	Platelets, pheresis	R	9500	\$144.68	\$143.80	-\$0.88	-0.6%
P9035	Platelet pheres leukoreduced	R	9521	\$217.66	\$268.36	\$50.70	23.3%
P9036	Platelet pheresis irradiated	R	9507	\$330.80	\$333.97	\$3.17	1.0%
P9037	Plate pheres leukoredu irradi	R	9501	\$496.91	\$485.66	-\$11.25	-2.3%
P9038	Rbc irradiated	R	9502	\$617.61	\$616.68	-\$0.93	-0.2%
P9039	Rbc deglycerolized	R	9530	\$630.32	\$638.19	\$7.87	1.2%
P9040	Rbc leukoreduced irradiated	R	9505	\$172.87	\$196.20	\$23.33	13.5%
P9043	Plasma protein fract,5%,50ml	R	9504	\$445.83	\$413.23	-\$32.60	-7.3%
P9044	Cryoprecipitatereducedplasma	R	9522	\$266.03	\$259.12	-\$6.91	-2.6%
P9048	Plasmaprotein fract,5%,250ml	R	9514	\$8.17	\$7.94	-\$0.23	-2.8%
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	\$216.68	\$196.43	-\$20.25	-9.3%
P9052	Platelets, hla-m, l/r, unit	R	9525	\$822.11	\$828.56	\$6.45	0.8%
P9053	Plt, pher, l/r cmv-neg, irr	R	9531	\$456.71	\$532.45	\$75.74	16.6%
P9054	Blood, l/r, froz/degly/wash	R	9527	\$317.22	\$296.88	-\$20.34	-6.4%
P9055	Plt, aph/pher, l/r, cmv-neg	R	9528	\$490.13	\$333.62	-\$156.51	-31.9%
P9056	Blood, l/r, irradiated	R	9529	\$157.39	\$108.72	-\$48.67	-30.9%
P9057	Rbc, frz/deg/wsh, l/r, irradi	R	9532	\$266.06	\$393.84	\$127.78	48.0%
P9058	Rbc, l/r, cmv-neg, irradi	R	9533	\$248.99	\$250.99	\$2.00	0.8%
P9059	Plasma, frz between 8-24hour	R	9513	\$72.64	\$76.20	\$3.56	4.9%
P9060	Fr frz plasma donor retested	R	9503	\$66.45	\$54.74	-\$11.71	-17.6%
P9070	Pathogen reduced plasma pool	R	9534	\$54.22	\$73.01	\$18.79	34.7%
P9071	Pathogen reduced plasma sing	R	9535	\$125.40	\$88.91	-\$36.49	-29.1%

Table 1 (continued). Blood and Blood Products

HCPCS Code	Short Descriptor	2023 SI	2023 APC	Final 2022 Payment	Final 2023 Payment Rate	\$ Change 2022-2023	% Change 2022-2023
P9073	Platelets pheresis path redu	R	9536	\$596.13	\$577.89	-\$18.24	-3.1%
P9099	Blood component/product noc	R	9537	\$8.17	\$54.74	\$46.57	570.0%
C9507	COVID-19 convalescent plasma	R	9540	\$750.50	\$729.81	-\$20.69	-2.8%

Table 2. Transfusion, Apheresis, and Stem Cell Procedures

HCPCS Code	Short Descriptor	2023 SI	2023 APC	Final 2022 Payment	Final 2023 Payment Rate	\$ Change 2022-2023	% Change 2022-2023	
36430	Blood transfusion service	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
36440	Bl push transfuse 2 yr/<	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
36450	Bl exchange/transfuse nb	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
36455	Bl exchange/transfuse non-nb	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
36456	Prtl exchange transfuse nb	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
36460	Transfusion service fetal	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
36511	Apheresis wbc	S	5242	\$1,393.02	\$1,359.84	-\$33.18	-2.4%	
36512	Apheresis rbc	S	5242	\$1,393.02	\$1,359.84	-\$33.18	-2.4%	
36513	Apheresis platelets	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
36514	Apheresis plasma	S	5242	\$1,393.02	\$1,359.84	-\$33.18	-2.4%	
36516	Apheresis immunoads slctv	S	5243	\$4,130.46	\$4,160.00	\$29.54	0.7%	
36522	Photopheresis	S	5243	\$4,130.46	\$4,160.00	\$29.54	0.7%	
38205	Harvest allogeneic stem cell	B	Not paid under OPSS					
38206	Harvest auto stem cells	S	5242	\$1,393.02	\$1,359.84	-\$33.18	-2.4%	
38207	Cryopreserve stem cells	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38208	Thaw preserved stem cells	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38209	Wash harvest stem cells	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38210	T-cell depletion of harvest	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38211	Tumor cell deplete of harvest	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38212	Rbc depletion of harvest	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38213	Platelet deplete of harvest	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38214	Volume deplete of harvest	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38215	Harvest stem cell concentrate	S	5241	\$405.37	\$407.75	\$2.38	0.6%	
38220	Dx bone marrow aspirations	J1	5072	\$1,436.99	\$1,499.55	\$62.56	4.4%	
38221	Dx bone marrow biopsies	J1	5072	\$1,436.99	\$1,499.55	\$62.56	4.4%	
38222	Dx bone marrow bx & aspir	J1	5072	\$2,421.55	\$2,583.25	\$161.70	6.7%	
38230	Bone marrow harvest allogeneic	S	5242	\$1,393.02	\$1,359.84	-\$33.18	-2.4%	
38232	Bone marrow harvest autolog	S	5243	\$4,130.46	\$4,160.00	\$29.54	0.7%	
38240	Transplnt allo hct/donor	J1	5244	\$41,026.98	\$42,233.40	\$1,206.42	2.9%	
38241	Transplnt autol hct/donor	S	5242	\$1,393.02	\$1,359.84	-\$33.18	-2.4%	
38242	Transplnt allo lymphocytes	S	5242	\$1,393.02	\$1,359.84	-\$33.18	-2.4%	
38243	Transplnt hematopoietic boost	S	5242	\$1,393.02	\$1,359.84	-\$33.18	-2.4%	
88184	Flowcytometry/ tc 1 marker	Q2	5673	\$297.45	\$324.11	\$26.66	9.0%	
88185	Flowcytometry/tc add-on	N	Paid under OPSS; payment is packaged into payment for other services. Therefore, there is no separate APC payment.					

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

Short Descriptor	Short Descriptor	Short Descriptor	Short Descriptor
88187	Flowcytometry/read 2-8	B	Not paid under OPPS.
88188	Flowcytometry/read 9-15	B	Not paid under OPPS.
88189	Flowcytometry/read 16 & >	B	Not paid under OPPS.

Table 3. Transfusion Laboratory Services

HCPCS Code	Short Descriptor	2023 SI	2023 APC	Final 2022 Payment	Final 2023 Payment Rate	\$ Change 2022-2023	% Change 2022-2023
86850	Rbc antibody screen	Q1	5671	\$50.75	\$50.14	-\$0.61	-1.2%
86860	Rbc antibody elution	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86870	Rbc antibody identification	Q2	5673	\$297.45	\$324.11	\$26.66	9.0%
86880	Coombs test direct	Q1	5733	\$56.85	\$57.48	\$0.63	1.1%
86885	Coombs test indirect qual	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86886	Coombs test indirect titer	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86890	Autologous blood process	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86891	Autologous blood op salvage	Q1	5674	\$669.29	\$776.51	\$107.22	16.0%
86900	Blood typing serologic abo	Q1	5734	\$115.16	\$116.11	\$0.95	0.8%
86901	Blood typing serologic rh(d)	Q1	5732	\$34.57	\$33.96	-\$0.61	-1.8%
86902	Blood type antigen donor ea	Q1	5673	\$297.45	\$324.11	\$26.66	9.0%
86904	Blood typing patient serum	Q1	5732	\$34.57	\$33.96	-\$0.61	-1.8%
86905	Blood typing rbc antigens	Q1	5673	\$297.45	\$324.11	\$26.66	9.0%
86906	Bld typing serologic rh phnt	Q1	5732	\$34.57	\$33.96	-\$0.61	-1.8%
86920	Compatibility test spin	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86921	Compatibility test incubate	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86922	Compatibility test antiglob	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86923	Compatibility test electric	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86927	Plasma fresh frozen	S	5672	\$152.32	\$157.25	\$4.93	3.2%
86930	Frozen blood prep	Q1	5673	\$297.45	\$324.11	\$26.66	9.0%
86931	Frozen blood thaw	Q1	5673	\$297.45	\$324.11	\$26.66	9.0%
86932	Frozen blood freeze/thaw	Q1	5732	\$34.57	\$33.96	-\$0.61	-1.8%
86945	Blood product/irradiation	Q1	5732	\$34.57	\$33.96	-\$0.61	-1.8%
86950	Leukocyte transfusion	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86960	Vol reduction of blood/prod	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86965	Pooling blood platelets	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86970	Rbc pretx incubatj w/chemical	Q1	5732	\$34.57	\$33.96	-\$0.61	-1.8%
86971	Rbc pretx incubatj w/enzymes	Q1	5673	\$297.45	\$324.11	\$26.66	9.0%
86972	Rbc pretx incubatj w/density	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86975	Rbc serum pretx incubj drugs	Q1	5735	\$277.18	\$377.57	\$100.39	36.2%
86976	Rbc serum pretx id dilution	Q1	5731	\$25.23	\$24.96	-\$0.27	-1.1%
86977	Rbc serum pretx incubj/inhib	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86978	Rbc pretreatment serum	Q1	5732	\$34.57	\$33.96	-\$0.61	-1.8%
86985	Split blood or products	Q1	5672	\$152.32	\$157.25	\$4.93	3.2%
86999	Transfusion procedure	Q1	5731	\$25.23	\$24.96	-\$0.27	-1.1%
P9100	Pathogen test for platelets	S	5733	\$56.85	\$57.48	\$0.63	1.1%

Table 4. CAR T-Cell Therapies

HCPCS Code	Short Descriptor	2023 SI	2023 APC	Final 2022 Payment	Final 2023 Payment Rate	\$ Change 2022-2023	% Change 2022-2023
Q2041	Axicabtagene ciloleucel car+	N	9035	\$395,380.00	\$422,884.770	\$27,504.77	7.0%
Q2042	Tisagenlecleucel car pos t	K	9194	\$434,337.60	\$453,856.60	\$19,519.00	4.5%
Q2053	Brexucabtagene car pos t	G	9391	\$395,380.00	\$422,940.00	\$27,560.00	7.0%
Q2054	Lisocabtagene maraleucel, car pos t	G	9413	\$422,609.00	\$434,918.00	\$12,309.00	2.9%
Q2055	Idecabtagene vicleucel car	G	9422	\$432,085.00	\$444,670.00	\$12,585.00	2.9%
Q2056	Ciltacabtagene car-pos t	G	9498	NA	\$478,950.00	NA	NA