

## **Centers for Medicare & Medicaid Services Proposed Medicare Hospital Outpatient Payment Rates and Policies for CY 2025**

On July 10<sup>th</sup>, 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) 2025. CMS proposes to increase all payment rates under the OPPS hospital outpatient department fee schedule by 2.6 percent, which is based on the most recent updated cost reports and claims data available for the CY 2025 OPPS ratesetting. Comments are due to CMS on September 9, 2024.

### **Proposed Payment Policies and Rates for Blood and Blood Components Transfusion Medicine and Cellular Therapies**

CMS proposes to continue using the blood-specific cost-to-charge ratio (CCR) methodology, in place since 2005, to establish separate payment rates for blood and blood products through ambulatory payment classifications (APCs). The CCR methodology utilizes actual or simulated CCRs from the recently available hospital cost reports to convert hospital charges for blood and blood products to costs. CMS also proposes to continue applying the blood-specific CCR methodology for calculating the reported 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 included in the overall costs 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 variable payment rates for the majority of blood products based on CY 2023 claims data and APC weighting policy. The proposed payment rates for blood and blood products can be found in Table 1.

### **Proposed Payment Policies and Rates for Transfusion, Apheresis, Stem Cell Procedures, and Transfusion Laboratory Services**

For CY 2025, CMS proposes payment rate increases ranging from 4.2% to 12% for transfusion, apheresis, and stem cell procedures. The proposed payment rates are detailed in Table 2.

CMS also proposes to increase the payment rates for almost all transfusion laboratory services covered by the OPPS. However, decreases are noted for HCPCS/CPT codes 86976 (pretreatment of serum for use in RBC antibody identification) and 86999 (unlisted transfusion procedure). A summary of the proposed payment rates for transfusion laboratory services is provided in Table 3.

### **Proposed Payment Policies and Rates for Cell Therapies**

Table 4 summarizes the proposed payment rates for chimeric antigen receptor therapy (CAR-T) cell therapies. CMS did not propose changes to the payment policy for the CAR-T cell therapy steps required to harvest, collect, and prepare the genetically modified T-cells for administration (HCPCS/CPT codes 0537T, 0538T, and 0539T). These steps are currently tracked but not paid separately under the OPPS, as 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. AABB will continue to advocate for separate payment for these clinical steps.

*A. Exclusion of Cell and Gene Therapies from the C-APC Policy*

CMS's C-APC policy packages payment for items and services that are integral, ancillary, supportive, dependent, or adjunctive to the primary service, including diagnostic procedures and treatments that assist in delivering the primary procedure. However, certain cell and gene therapies, typically separately payable under OPSS, are being packaged under the C-APC policy despite being the primary treatment administered to patients. Therefore, CMS proposes excluding nine cell and gene therapies from the C-APC packaging policy for one year, recognizing them as independent therapies. CMS seeks comments on whether this proposed policy captures all relevant cell and gene therapy products.

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If you have any feedback that you would like for AABB to consider for public comment or if you have any questions on the proposed rule, please email [advocacy@aabb.org](mailto:advocacy@aabb.org).

**Table 1. Blood and Blood Products**

HCPCS Code	Short Descriptor	2025 SI	2025 APC	Final 2024 Payment	Proposed CY 2025 Payment Rate	\$ Change 2024-2025	% Change 2024-2025
P9010	Whole blood for transfusion	R	9510	\$203.31	\$227.89	\$24.58	12.1%
P9011	Blood split unit	R	9520	\$149.23	\$143.16	-\$6.07	-4.1%
P9012	Cryoprecipitate each unit	R	9511	\$59.93	\$61.94	\$2.01	3.4%
P9016	Rbc leukocytes reduced	R	9512	\$181.00	\$181.60	\$0.60	0.3%
P9017	Plasma 1 donor frz w/in 8 hr	R	9508	\$80.05	\$85.70	\$5.65	7.1%
P9019	Platelets, each unit	R	9515	\$65.11	\$70.70	\$5.59	8.6%
P9020	Platelet rich plasma unit	R	9516	\$549.37	\$545.57	-\$3.80	-0.7%
P9021	Red blood cells unit	R	9517	\$136.65	\$141.02	\$4.37	3.2%
P9022	Washed red blood cells unit	R	9518	\$397.54	\$375.47	-\$22.07	-5.6%
P9023	Frozen plasma, pooled, sd	R	9509	\$60.52	\$54.60	-\$5.92	-9.8%
P9025	Plasma cryo redu path each	R	9538	\$309.99	\$141.06	-\$168.93	-54.5%
P9026	Cryo fib comp path redu each	R	9539	\$79.40	\$322.44	\$243.04	306.1%
P9031	Platelets leukocytes reduced	R	9538	\$131.01	\$126.60	-\$4.41	-3.4%
P9032	Platelets, irradiated	R	9539	\$133.49	\$133.86	\$0.37	0.3%
P9033	Platelets leukoreduced irradi	R	9526	\$230.87	\$209.51	-\$21.36	-9.3%
P9034	Platelets, pheresis	R	9500	\$322.19	\$393.62	\$71.43	22.2%
P9035	Platelet pheres leukoreduced	R	9521	\$472.82	\$485.25	\$12.43	2.6%
P9036	Platelet pheresis irradiated	R	9507	\$560.53	\$571.82	\$11.29	2.0%
P9037	Plate pheres leukoredu irradi	R	9501	\$673.18	\$672.68	-\$0.50	-0.1%
P9038	Rbc irradiated	R	9502	\$216.94	\$147.36	-\$69.58	-32.1%
P9039	Rbc deglycerolized	R	9530	\$311.44	\$718.29	\$406.85	130.6%
P9040	Rbc leukoreduced irradiated	R	9505	\$252.74	\$250.99	-\$1.75	-0.7%
P9043	Plasma protein fract,5%,50ml	R	9504	\$10.62	\$7.90	-\$2.72	-25.6%
P9044	Cryoprecipitatereducedplasma	R	9522	\$7.95	\$68.74	\$60.79	764.7%
P9048	Plasmaprotein fract,5%,250ml	R	9514	\$69.22	\$122.15	\$52.93	76.5%
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	\$167.42	\$182.35	\$14.93	8.9%
P9052	Platelets, hla-m, l/r, unit	R	9525	\$721.43	\$778.23	\$56.80	7.9%
P9053	Plt, pher, l/r cmv-neg, irr	R	9531	\$518.73	\$451.90	-\$66.83	-12.9%
P9054	Blood, l/r, froz/degly/wash	R	9527	\$215.44	\$237.81	\$22.37	10.4%
P9055	Plt, aph/pher, l/r, cmv-neg	R	9528	\$251.07	\$236.75	-\$14.32	-5.7%
P9056	Blood, l/r, irradiated	R	9529	\$92.07	\$85.82	-\$6.25	-6.8%
P9057	Rbc, frz/deg/wsh, l/r, irradi	R	9532	\$493.21	\$501.56	\$8.35	1.7%
P9058	Rbc, l/r, cmv-neg, irradi	R	9533	\$242.12	\$217.42	-\$24.70	-10.2%
P9059	Plasma, frz between 8-24hour	R	9513	\$72.65	\$68.05	-\$4.60	-6.3%
P9060	Fr frz plasma donor retested	R	9503	\$58.15	\$45.81	-\$12.34	-21.2%
P9070	Pathogen reduced plasma pool	R	9534	\$31.27	\$56.18	\$24.91	79.7%

**Table 1 (continued). Blood and Blood Products**

<b>HCPCS Code</b>	<b>Short Descriptor</b>	<b>2025 SI</b>	<b>2025 APC</b>	<b>Final 2024 Payment</b>	<b>Proposed CY 2025 Payment Rate</b>	<b>\$ Change 2024-2025</b>	<b>% Change 2024-2025</b>
P9071	Pathogen reduced plasma sing	R	9535	\$231.82	\$273.25	\$41.43	17.9%
P9073	Platelets pheresis path redu	R	9536	\$551.85	\$570.19	\$18.34	3.3%
P9099	Blood component/product noc	R	9537	\$31.27	\$45.81	\$14.54	46.5%
P9100	Pathogen test for platelets	S	5733	\$57.48	\$58.13	\$0.65	1.1%
C9507	COVID-19 convalescent plasma	R	9540	\$490.64	\$443.51	-\$47.13	-9.6%

**Table 2. Transfusion, Apheresis, and Stem Cell Procedures**

HCPCS Code	Short Descriptor	2025 SI	2025 APC	Final 2024 Payment	Proposed CY 2025 Payment Rate	\$ Change 2024-2025	% Change 2024-2025
36430	Blood transfusion service	S	5241	\$414.04	\$431.37	\$17.33	4.2%
36440	Bl push transfuse 2 yr/<	S	5241	\$414.04	\$431.37	\$17.33	4.2%
36450	Bl exchange/transfuse nb	S	5241	\$414.04	\$431.37	\$17.33	4.2%
36455	Bl exchange/transfuse non-nb	S	5241	\$414.04	\$431.37	\$17.33	4.2%
36456	Prtl exchange transfuse nb	S	5241	\$414.04	\$431.37	\$17.33	4.2%
36460	Transfusion service fetal	S	5241	\$414.04	\$431.37	\$17.33	4.2%
36511	Apheresis wbc	S	5242	\$1,463.41	\$1,644.59	\$181.18	12.4%
36512	Apheresis rbc	S	5242	\$1,463.41	\$1,644.59	\$181.18	12.4%
36513	Apheresis platelets	S	5241	\$414.04	\$431.37	\$17.33	4.2%
36514	Apheresis plasma	S	5242	\$1,463.41	\$1,644.59	\$181.18	12.4%
36516	Apheresis immunoads slctv	S	5243	\$4,413.93	\$4,707.85	\$293.92	6.7%
36522	Photopheresis	S	5243	\$4,413.93	\$4,707.85	\$293.92	6.7%
38205	Harvest allogeneic stem cell	B	Not paid under OPPS				
38206	Harvest auto stem cells	S	5242	\$1,463.41	\$1,644.59	\$181.18	12.4%
38207	Cryopreserve stem cells	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38208	Thaw preserved stem cells	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38209	Wash harvest stem cells	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38210	T-cell depletion of harvest	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38211	Tumor cell deplete of harvest	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38212	Rbc depletion of harvest	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38213	Platelet deplete of harvest	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38214	Volume deplete of harvest	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38215	Harvest stem cell concentrate	S	5241	\$414.04	\$431.37	\$17.33	4.2%
38220	Dx bone marrow aspirations	J1	5072	\$1,546.35	\$1,615.22	\$68.87	4.5%
38221	Dx bone marrow biopsies	J1	5072	\$1,546.35	\$1,615.22	\$68.87	4.5%
38222	Dx bone marrow bx & aspir	J1	5072	\$2,710.16	\$2,824.39	\$114.23	4.2%
38230	Bone marrow harvest allogeneic	S	5242	\$1,463.41	\$1,644.59	\$181.18	12.4%
38232	Bone marrow harvest autolog	S	5243	\$4,413.93	\$4,707.85	\$293.92	6.7%
38240	Transplnt allo hct/donor	J1	5244	\$52,120.36	\$57,354.34	\$5,233.98	10.0%
38241	Transplnt autol hct/donor	S	5242	\$1,463.41	\$1,644.59	\$181.18	12.4%
38242	Transplnt allo lymphocytes	S	5242	\$1,463.41	\$1,644.59	\$181.18	12.4%
38243	Transplnt hematopoietic boost	S	5242	\$1,463.41	\$1,644.59	\$181.18	12.4%
88184	Flowcytometry/ tc 1 marker	Q2	5673	\$342.83	\$356.00	\$13.17	3.8%
88185	Flowcytometry/tc add-on	N	Paid under OPPS; payment is packaged into payment for other services. Therefore, there is no separate APC payment.				
88187	Flowcytometry/read 2-8	B	Not paid under OPPS.				
88188	Flowcytometry/read 9-15	B	Not paid under OPPS.				

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

<b>HCPCS Code</b>	<b>Short Descriptor</b>	<b>2025 SI</b>	<b>2025 APC</b>	<b>Final 2024 Payment</b>	<b>Proposed CY 2025 Payment Rate</b>	<b>\$ Change 2024-2025</b>	<b>% Change 2024-2025</b>
88189	Flowcytometry/read 16 & >	B				Not paid under OPSS.	

**Table 3. Transfusion Laboratory Services**

HCPCS Code	Short Descriptor	2025 SI	2025 APC	Final 2024 Payment	Proposed CY 2025 Payment Rate	\$ Change 2024-2025	% Change 2024-2025
86850	Rbc antibody screen	Q1	5671	\$51.68	\$53.43	\$1.75	3.4%
86860	Rbc antibody elution	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86870	Rbc antibody identification	Q2	5673	\$342.83	\$356.00	\$13.17	3.8%
86880	Coombs test direct	Q1	5733	\$59.07	\$59.07	\$0.00	0.0%
86885	Coombs test indirect qual	Q1	5672	\$170.29	\$170.29	\$0.00	0.0%
86886	Coombs test indirect titer	Q1	5672	\$170.29	\$170.29	\$0.00	0.0%
86890	Autologous blood process	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86891	Autologous blood op salvage	Q1	5674	\$820.15	\$879.03	\$58.88	7.2%
86900	Blood typing serologic abo	Q1	5734	\$121.84	\$127.99	\$6.15	5.0%
86901	Blood typing serologic rh(d)	Q1	5732	\$38.26	\$39.96	\$1.70	4.4%
86902	Blood type antigen donor ea	Q1	5673	\$342.83	\$356.00	\$13.17	3.8%
86904	Blood typing patient serum	Q1	5732	\$58.34	\$59.07	\$0.73	1.3%
86905	Blood typing rbc antigens	Q1	5673	\$342.83	\$356.00	\$13.17	3.8%
86906	Bld typing serologic rh phnt	Q1	5732	\$38.26	\$39.96	\$1.70	4.4%
86920	Compatibility test spin	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86921	Compatibility test incubate	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86922	Compatibility test antiglob	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86923	Compatibility test electric	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86927	Plasma fresh frozen	S	5672	\$162.92	\$170.29	\$7.37	4.5%
86930	Frozen blood prep	Q1	5673	\$162.92	\$170.29	\$7.37	4.5%
86931	Frozen blood thaw	Q1	5673	\$162.92	\$170.29	\$7.37	4.5%
86932	Frozen blood freeze/thaw	Q1	5732	\$38.26	\$39.96	\$1.70	4.4%
86945	Blood product/irradiation	Q1	5732	\$38.26	\$39.96	\$1.70	4.4%
86950	Leukocyte transfusion	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86960	Vol reduction of blood/prod	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86965	Pooling blood platelets	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86970	Rbc pretx incubatj w/chemical	Q1	5732	\$58.34	\$59.07	\$0.73	1.3%
86971	Rbc pretx incubatj w/enzymes	Q1	5673	\$162.92	\$170.29	\$7.37	4.5%
86972	Rbc pretx incubatj w/density	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86975	Rbc serum pretx incubj drugs	Q1	5735	\$380.02	\$383.42	\$3.40	0.9%
86976	Rbc serum pretx id dilution	Q1	5731	\$28.41	\$24.55	-\$3.86	-13.6%
86977	Rbc serum pretx incubj/inhib	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86978	Rbc pretreatment serum	Q1	5732	\$58.34	\$59.07	\$0.73	1.3%
86985	Split blood or products	Q1	5672	\$162.92	\$170.29	\$7.37	4.5%
86999	Unlisted transfusion procedure	Q1	5731	\$28.41	\$24.55	-\$3.86	-13.6%

**Table 4. CAR T-Cell Therapies**

<b>HCPCS Code</b>	<b>Short Descriptor</b>	<b>2025 SI</b>	<b>2025 APC</b>	<b>Final 2024 Payment</b>	<b>Proposed CY 2025 Payment Rate</b>	<b>\$ Change 2024-2025</b>	<b>% Change 2024-2025</b>
Q2041	Axicabtagene ciloleucel car+	K	9035	\$449,341.851	\$459,381.446	\$10,039.60	2.2%
Q2042	Tisagenlecleucel car pos t	K	9194	\$484,623.489	\$518,240.680	\$33,617.19	6.9%
Q2043	Sipuleucel-t auto cd54+	K	9273	\$53,472.873	\$55,453.567	\$1,980.69	3.7%
Q2053	Brexucabtagene car pos t	K	9391	\$449,440.000	\$449,440.000	\$0.00	0.0%
Q2054	Lisocabtagene maraleucel, car pos t	G	9413	\$473,458.426	\$474,060.620	\$602.19	0.1%
Q2055	Idecabtagene vicleucel car	G	9422	\$483,453.660	\$484,690.300	\$1,236.64	0.3%
Q2056	Ciltacabtagene car-pos t	G	9498	\$497,024.646	\$507,495.551	\$10,470.91	2.1%