Advancing Transfusion and Cellular Therapies Worldwide

Centers for Medicare & Medicaid Services Proposes Medicare Hospital Outpatient Payment Rates and Policies for CY 2022

On Monday, July 19th, 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 2022. CMS proposes to increase all payment rates under the OPPS hospital outpatient department fee schedule by 2.3 percent, which is based on the proposed hospital inpatient market basket increase in the hospital inpatient prospective payment system (IPPS). Significant proposals for the transfusion medicine and cellular therapy community include an increase for hospital outpatient payment rates for blood and blood products. Comments are due to CMS on September 17, 2021.

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 increase payment rates for all blood products. As a result of the COVID–19 public health emergency (PHE) and concerns around incomplete claims data for CY 2020, CMS is proposing to use the CY 2019 claims data to establish the OPPS rates for CY 2022. As a result, CMS proposes to increase the payment rate for nearly all blood products by 2.6 percent. Please see Table 1 and 2 for a summary of the proposed payment rates for blood and blood products and transfusion, apheresis, and stem cell procedures. In January 2021, AABB submitted comments to CMS highlighting flaws with the methodology that CMS used to establish the payment rate for a new HCPCS code, P9099 (Blood component or product not otherwise classified). AABB intends to highlight this issue in comments responding to the 2022 OPPS proposed rule.

As summarized in Table 3, CMS proposes to increase the payment rates for all transfusion, laboratory services covered by the OPPS. However, CMS did not propose a payment rate for CY 2022 for 86932 (frozen blood freeze/thaw) as the agency only received a limited number of claims (4 claims) and could not evaluate a rate for this period. CMS also identified APC services with an "O" to indicate that an offline process was used to set the proposed payment amount for the APC. Please see Table 3 for a summary of the proposed payment rates for transfusion laboratory services.

Additionally, the chimeric antigen receptor (CAR) T-cell therapies Q2041 (Axicabtagene ciloleucel car+) and Q2042 (Tisagenlecleucel car-pos t)) moved from a pass-through payment status to a non-pass-through payment status for CY 2021 in July 2021. This change is due to these therapies no longer qualifying under the New Technology APC group. Services or therapies are paid under a New Technology APC until sufficient claims data have been collected to allow CMS to assign the procedure to a clinical APC group that is appropriate in clinical and resource terms. Two new CAR T-cell products Q2053 (Brexucabtagene car pos t) and C9076 (Lisocabtagene Maraleucel anti-cd19 car-

pos t) were assigned to New Technology APCs and have a pass-through payment status as of July 1, 2021. Table 4 summarizes the proposed payment rates for CAR T-cell therapies.

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AABB will be submitting comments to CMS on the proposed rule. 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.

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Table 1. Blood and Blood Products							
HCPCS Code	**Short Descriptor**	**2022 SI**	**2022 APC**	**Final 2021 Payment**	**Proposed CY 2022 Payment Rate**	**$ Change 2021-2022**	**% Change 2021-2022**
P9010	Whole blood for transfusion	R	9510	$150.14	$154.08	$3.94	2.6%
P9011	Blood split unit	R	9520	$147.58	$151.45	$3.87	2.6%
P9012	Cryoprecipitate each unit	R	9511	$79.85	$81.94	$2.09	2.6%
P9016	Rbc leukocytes reduced	R	9512	$188.51	$193.41	$4.90	2.6%
P9017	Plasma 1 donor frz w/in 8 hr	R	9508	$82.66	$84.84	$2.18	2.6%
P9019	Platelets, each unit	R	9515	$71.29	$73.17	$1.88	2.6%
P9020	Platelet rich plasma unit	R	9516	$200.00	$205.25	$5.25	2.6%
P9021	Red blood cells unit	R	9517	$137.63	$141.24	$3.61	2.6%
P9022	Washed red blood cells unit	R	9518	$379.86	$389.81	$9.95	2.6%
P9023	Frozen plasma, pooled, sd	R	9509	$89.15	$91.48	$2.33	2.6%
P9031	Platelets leukocytes reduced	R	9526	$149.92	$153.84	$3.92	2.6%
P9032	Platelets, irradiated	R	9500	$141.69	$145.40	$3.71	2.6%
P9033	Platelets leukoreduced irrad	R	9521	$213.19	$218.77	$5.58	2.6%
P9034	Platelets, pheresis	R	9507	$323.99	$332.48	$8.49	2.6%
P9035	Platelet pheres leukoreduced	R	9501	$486.80	$499.54	$12.74	2.6%
P9036	Platelet pheresis irradiated	R	9502	$604.89	$620.73	$15.84	2.6%
P9037	Plate pheres leukoredu irrad	R	9530	$617.33	$633.50	$16.17	2.6%
P9038	Rbc irradiated	R	9505	$169.31	$173.74	$4.43	2.6%
P9039	Rbc deglycerolized	R	9504	$436.65	$448.08	$11.43	2.6%
P9040	Rbc leukoreduced irradiated	R	9522	$260.55	$267.37	$6.82	2.6%
P9043	Plasma protein fract,5%,50ml	R	9514	$7.99	$8.21	$0.22	2.7%
P9044	Cryoprecipitatereducedplasma	R	9523	$65.70	$67.42	$1.72	2.6%
P9048	Plasmaprotein fract,5%,250ml	R	9519	$160.34	$164.55	$4.21	2.6%
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	$212.23	$217.78	$5.55	2.6%
P9052	Platelets, hla-m, l/r, unit	R	9525	$805.18	$826.27	$21.09	2.6%
P9053	Plt, pher, l/r cmv-neg, irr	R	9531	$447.31	$459.02	$11.71	2.6%
P9054	Blood, l/r, froz/degly/wash	R	9527	$310.70	$318.83	$8.13	2.6%
P9055	Plt, aph/pher, l/r, cmv-neg	R	9528	$480.04	$492.60	$12.56	2.6%
P9056	Blood, l/r, irradiated	R	9529	$154.16	$158.20	$4.04	2.6%
P9057	Rbc, frz/deg/wsh, l/r, irrad	R	9532	$260.59	$267.41	$6.82	2.6%
P9058	Rbc, l/r, cmv-neg, irrad	R	9533	$243.87	$250.25	$6.38	2.6%
P9059	Plasma, frz between 8-24hour	R	9513	$71.15	$73.00	$1.85	2.6%
P9060	Fr frz plasma donor retested	R	9503	$65.08	$66.79	$1.71	2.6%
P9070	Pathogen reduced plasma pool	R	9534	$53.10	$54.50	$1.40	2.6%

Table 1 (continued). Blood and Blood Products							
HCPCS Code	**Short Descriptor**	**2022 SI**	**2022 APC**	**Final 2021 Payment**	**Proposed CY 2022 Payment Rate**	**$ Change 2021-2022**	**% Change 2021-2022**
P9071	Pathogen reduced plasma sing	R	9535	$122.82	$126.04	$3.22	2.6%
P9073	Platelets pheresis path redu	R	9536	$583.87	$599.15	$15.28	2.6%
P9099	Blood component/product noc	R	9537	$7.99	$8.21	$0.22	2.8%

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Table 2. Transfusion, Apheresis, and Stem Cell Procedures							
HCPCS Code	**Short Descriptor**	**2022 SI**	**2022 APC**	**Final 2021 Payment**	**Proposed CY 2022 Payment Rate**	**$ Change 2021-2022**	**% Change 2021-2022**
36430	Blood transfusion service	S	5241	$397.06	$407.34	$10.28	2.6%
36440	Bl push transfuse 2 yr/<	S	5241	$397.06	$407.34	$10.28	2.6%
36450	Bl exchange/transfuse nb	S	5241	$397.06	$407.34	$10.28	2.6%
36455	Bl exchange/transfuse non-nb	S	5241	$397.06	$407.34	$10.28	2.6%
36456	Prtl exchange transfuse nb	S	5241	$397.06	$407.34	$10.28	2.6%
36460	Transfusion service fetal	S	5241	$397.06	$407.34	$10.28	2.6%
36511	Apheresis wbc	S	5242	$1,363.16	$1,399.24	$36.08	2.6%
36512	Apheresis rbc	S	5242	$1,363.16	$1,399.24	$36.08	2.6%
36513	Apheresis platelets	S	5241	$397.06	$407.34	$10.28	2.6%
36514	Apheresis plasma	S	5242	$1,363.16	$1,399.24	$36.08	2.6%
36516	Apheresis immunoads slctv	S	5243	$4,037.71	$4,147.95	$110.24	2.7%
36522	Photopheresis	S	5243	$4,037.71	$4,147.95	$110.24	2.7%
38205	Harvest allogeneic stem cell	B	Not paid under OPPS				
38206	Harvest auto stem cells	S	5242	$1,363.16	$1,399.24	$36.08	2.6%
38207	Cryopreserve stem cells	S	5241	$397.06	$407.34	$10.28	2.6%
38208	Thaw preserved stem cells	S	5241	$397.06	$407.34	$10.28	2.6%
38209	Wash harvest stem cells	S	5241	$397.06	$407.34	$10.28	2.6%
38210	T-cell depletion of harvest	S	5241	$397.06	$407.34	$10.28	2.6%
38211	Tumor cell deplete of harvest	S	5241	$397.06	$407.34	$10.28	2.6%
38212	Rbc depletion of harvest	S	5241	$397.06	$407.34	$10.28	2.6%
38213	Platelet deplete of harvest	S	5241	$397.06	$407.34	$10.28	2.6%
38214	Volume deplete of harvest	S	5241	$397.06	$407.34	$10.28	2.6%
38215	Harvest stem cell concentrate	S	5241	$397.06	$407.34	$10.28	2.6%
38220	Dx bone marrow aspirations	J1	5072	$1,407.00	$1,443.85	$36.85	2.6%
38221	Dx bone marrow biopsies	J1	5072	$1,407.00	$1,443.85	$36.85	2.6%
38222	Dx bone marrow bx & aspir	J1	5072	$2,370.01	$2,432.98	$62.97	2.7%
38230	Bone marrow harvest allogen	S	5242	$1,363.16	$1,399.24	$36.08	2.6%
38232	Bone marrow harvest autolog	S	5243	$4,037.71	$4,147.95	$110.24	2.7%
38240	Transplt allo hct/donor	J1	5244	$31,838.13	$41,829.95	$9,991.82	31.4%
38241	Transplt autol hct/donor	S	5242	$1,363.16	$1,399.24	$36.08	2.6%
38242	Transplt allo lymphocytes	S	5242	$1,363.16	$1,399.24	$36.08	2.6%
38243	Transplj hematopoietic boost	S	5242	$1,363.16	$1,399.24	$36.08	2.6%
88184	Flowcytometry/ tc 1 marker	Q2	5673	$291.26	$298.82	$7.56	2.6%
88185	Flowcytometry/tc add-on	N	Paid under OPPS; 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.

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Table 3. Transfusion Laboratory Services							
HCPCS Code	**Short Descriptor**	**2022 SI**	**2022 APC**	**Final 2021 Payment**	**Proposed CY 2022 Payment Rate**	**$ Change 2021-2022**	**% Change 2021-2022**
86850	Rbc antibody screen	Q1	5671	$49.76	$50.98	$1.22	2.5%
86860	Rbc antibody elution	Q1	5672	$149.16	$153.03	$3.87	2.6%
86870	Rbc antibody identification	Q2	5673	$291.26	$298.82	$7.56	2.6%
86880	Coombs test direct	Q1	5733 (O)	$55.66	$57.12	$1.46	2.6%
86885	Coombs test indirect qual	Q1	5672 (O)	$149.16	$153.03	$3.87	2.6%
86886	Coombs test indirect titer	Q1	5672	$149.16	$153.03	$3.87	2.6%
86890	Autologous blood process	Q1	5672	$149.16	$153.03	$3.87	2.6%
86891	Autologous blood op salvage	Q1	5674	$656.15	$672.01	$15.86	2.4%
86900	Blood typing serologic abo	Q1	5734	$111.95	$115.71	$3.76	3.4%
86901	Blood typing serologic rh(d)	Q1	5732 (O)	$33.84	$34.72	$0.88	2.6%
86902	Blood type antigen donor ea	Q1	5673	$291.26	$298.82	$7.56	2.6%
86904	Blood typing patient serum	Q1	5732 (O)	$33.84	$34.72	$0.88	2.6%
86905	Blood typing rbc antigens	Q1	5673	$291.26	$298.82	$7.56	2.6%
86906	Bld typing serologic rh phnt	Q1	5732 (O)	$33.84	$34.72	$0.88	2.6%
86920	Compatibility test spin	Q1	5672	$149.16	$153.03	$3.87	2.6%
86921	Compatibility test incubate	Q1	5672	$149.16	$153.03	$3.87	2.6%
86922	Compatibility test antiglob	Q1	5672	$149.16	$153.03	$3.87	2.6%
86923	Compatibility test electric	Q1	5672	$149.16	$153.03	$3.87	2.6%
86927	Plasma fresh frozen	S	5672	$149.16	$153.03	$3.87	2.6%
86930	Frozen blood prep	Q1	5673	$291.26	$298.82	$7.56	2.6%
86931	Frozen blood thaw	Q1	5673	$291.26	$298.82	$7.56	2.6%
86932	Frozen blood freeze/thaw	Q1	5732	No claims were available to calculate payment rates.			
86945	Blood product/irradiation	Q1	5732 (O)	$33.84	$34.72	$0.88	2.6%
86950	Leukocyte transfusion	Q1	5672	$149.16	$153.03	$3.87	2.6%
86960	Vol reduction of blood/prod	Q1	5672	$149.16	$153.03	$3.87	2.6%
86965	Pooling blood platelets	Q1	5672	$149.16	$153.03	$3.87	2.6%
86970	Rbc pretx incubatj w/chemical	Q1	5732 (O)	$33.84	$34.72	$0.88	2.6%
86971	Rbc pretx incubatj w/enzymes	Q1	5673	$291.26	$298.82	$7.56	2.6%
86972	Rbc pretx incubatj w/density	Q1	5672	$149.16	$153.03	$3.87	2.6%
86975	Rbc serum pretx incubj drugs	Q1	5735	$270.22	$278.56	$8.34	3.1%
86976	Rbc serum pretx id dilution	Q1	5731 (O)	$24.67	$25.35	$0.68	2.8%
86977	Rbc serum pretx incubj/inhib	Q1	5672	$149.16	$153.03	$3.87	2.6%
86978	Rbc pretreatment serum	Q1	5732 (O)	$33.84	$34.72	$0.88	2.6%
86985	Split blood or products	Q1	5672	$149.16	$153.03	$3.87	2.6%
86999	Transfusion procedure	Q1	5731 (O)	$24.67	$25.35	$0.68	2.8%
P9100	Pathogen test for platelets	S	5732	$33.84	$34.72	$0.88	2.6%

Table 4. CAR T-Cell Therapies							
HCPCS Code	**Short Descriptor**	**2022 SI**	**2022 APC**	**Final 2021 Payment**	**Proposed CY 2022 Payment Rate**	**$ Change 2021-2022**	**% Change 2021-2022**
Q2041	Axicabtagene ciloleucel car+	K	9035	$395,380.00	$395,380.00	$0.00	0.0%
Q2042	Tisagenlecleucel car pos t	K	9194	$429,813.31	$421,728.84	-$8,084.47	-1.9%
Q2053	Brexucabtagene car pos t	G	9391	NA	$395,380.00	NA	NA
C9076	Lisocabtagene maraleucel, car pos t	G	9413	NA	$422,609.00	NA	NA