



Centers for Medicare & Medicaid Services Proposes Medicare Hospital Outpatient Payment Rates and Policies for CY 2021

On December 2, the Centers for Medicare & Medicaid Services (CMS) released a [final rule](#) with a comment period updating Medicare payment rates and policies under the hospital outpatient prospective payment system (OPPS) and the ambulatory surgical center payment system for calendar year 2021. The final rule (1) updates payment policies and rates for CY 2021; and (2) establishes the payment rate for the blood not otherwise classified (NOC) HCPCS code P9099. The final rule is effective on January 1, 2021. Comments on the payment rates and classifications for HCPCS codes are due January 4, 2021.

Payment Policies and Rates for Transfusion Medicine and Cellular Therapies

As detailed in the Tables below, CMS finalized 2021 payment rates and policies for all items and services furnished under OPPS, including blood products, transfusion, apheresis, stem cell procedures, and transfusion laboratory services. For 2021, CMS reduced payments for each unit of platelets (P9019), irradiated apheresis platelets (P9036), Infusion, plasma protein fraction (human), 5%, 50 ml (P9043), cryoprecipitate reduced plasma (P9044), cmv-negative irradiated apheresis platelets (P9053) and irradiated blood (P9056). Additionally, CMS reassigned P9100, the code for “pathogen test for platelets,” from New Technology APC 1494 to clinical APC 5732 with a payment rate of \$33.84.

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

On January 1, 2020, CMS established a new HCPCS code P9099 to enable providers to report unclassified blood products. In the proposed rule, CMS recognized the concerns raised by the blood community that the status indicator initially assigned to P9099, “E2” (Not payable by Medicare when submitted on an outpatient claim) for CY 2020 was problematic since hospitals would not receive payment when they used unclassified blood products and claim lines billed with P9099 would be rejected by Medicare, preventing providers from tracking the utilization of unclassified blood products.

AABB, America’s Blood Centers, and the American Red Cross supported CMS’s proposal to assign P9099 a status indicator of “N” which would allow providers to report the cost of unclassified 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, which is P9043 (Infusion, plasma protein fraction [human], 5 percent, 50 ml), with a payment rate of \$7.79 per unit. CMS indicated that this change aligns with the OPPS policy to pay not otherwise classified codes at the lowest available ambulatory payment classification (APC) rate for a service category, while providing a payment when a service is reported. Additionally, the agency stated that this proposal would maintain incentives for manufacturers to establish individual HCPCS codes for new blood products in a timely manner.

Clinical Laboratory Date of Service (DOS) Policy

All Medicare claims for laboratory services must include the date of service (DOS), which impacts billing and payment requirements. In 2018, CMS finalized an exception to the DOS policy, which would require a performing laboratory to bill Medicare directly for advanced diagnostic laboratory tests (ADLTs) and molecular pathology tests provided to beneficiaries furnished services under the OPPS when certain requirements are satisfied.



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CMS finalized excluding cancer-related protein-based Multianalyte Assays with Algorithmic Analysis (MAAAs), which are not generally performed in the hospital outpatient setting, from the OPSS packaging policy, instead adding them to laboratory date-of-service (DOS) provisions. This change allows for Medicare to pay for cancer-related protein-based MAAAs under the Clinical Laboratory Fee Schedule (CLFS) instead of the OPSS, and the performing laboratory will bill Medicare directly for the test if the test meets all the laboratory DOS requirements.

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AABB will be submitting comments to CMS on the payment policy finalized for P9099. 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	2021 SI	2020 APC	2021 APC	Final 2020 Payment Rate	Final 2021 Payment Rate	\$ Change 2020-2021	% Change 2020-2021
P9010	Whole blood for transfusion	R	9510	9510	\$124.46	\$150.14	\$25.68	21%
P9011	Blood split unit	R	9520	9520	\$131.58	\$147.58	\$16.00	12%
P9012	Cryoprecipitate each unit	R	9511	9511	\$49.35	\$79.85	\$30.50	62%
P9016	Rbc leukocytes reduced	R	9512	9512	\$184.29	\$188.51	\$4.22	2%
P9017	Plasma 1 donor frz w/in 8 hr	R	9508	9508	\$81.94	\$82.66	\$0.72	1%
P9019	Platelets, each unit	R	9515	9515	\$105.71	\$71.29	-\$34.42	-33%
P9020	Platelet rich plasma unit	R	9516	9516	\$138.19	\$200.00	\$61.81	45%
P9021	Red blood cells unit	R	9517	9517	\$136.75	\$137.63	\$0.88	1%
P9022	Washed red blood cells unit	R	9518	9518	\$371.54	\$379.86	\$8.32	2%
P9023	Frozen plasma, pooled, sd	R	9509	9509	\$78.41	\$89.15	\$10.74	14%
P9031	Platelets leukocytes reduced	R	9526	9526	\$123.63	\$149.92	\$26.29	21%
P9032	Platelets, irradiated	R	9500	9500	\$136.64	\$141.69	\$5.05	4%
P9033	Platelets leukoreduced irradiated	R	9521	9521	\$212.44	\$213.19	\$0.75	0%
P9034	Platelets, pheresis	R	9507	9507	\$317.04	\$323.99	\$6.95	2%
P9035	Platelet pheres leukoreduced	R	9501	9501	\$488.84	\$486.80	-\$2.04	0%
P9036	Platelet pheresis irradiated	R	9502	9502	\$677.45	\$604.89	-\$72.56	-11%
P9037	Plate pheres leukoredu irradiated	R	9530	9530	\$621.01	\$617.33	-\$3.68	-1%
P9038	Rbc irradiated	R	9505	9505	\$186.71	\$169.31	-\$17.40	-9%
P9039	Rbc deglycerolized	R	9504	9504	\$313.54	\$436.65	\$123.11	39%
P9040	Rbc leukoreduced irradiated	R	9522	9522	\$257.10	\$260.55	\$3.45	1%
P9043	Plasma protein fract,5%,50ml	R	9514	9514	\$18.04	\$7.99	-\$10.05	-56%
P9044	Cryoprecipitate reduced plasma	R	9523	9523	\$89.44	\$65.70	-\$23.74	-27%
P9048	Plasma protein fract,5%,250ml	R	9519	9519	\$109.29	\$160.34	\$51.05	47%
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	9524	\$184.05	\$212.23	\$28.18	15%
P9052	Platelets, hla-m, l/r, unit	R	9525	9525	\$835.99	\$805.18	-\$30.81	-4%
P9053	Plt, pher, l/r cmv-neg, irr	R	9531	9531	\$491.41	\$447.31	-\$44.10	-9%
P9054	Blood, l/r, froz/degly/wash	R	9527	9527	\$275.05	\$310.70	\$35.65	13%
P9055	Plt, aph/pher, l/r, cmv-neg	R	9528	9528	\$474.71	\$480.04	\$5.33	1%
P9056	Blood, l/r, irradiated	R	9529	9529	\$198.94	\$154.16	-\$44.78	-23%
P9057	Rbc, frz/deg/wsh, l/r, irradiated	R	9532	9532	\$236.43	\$260.59	\$24.16	10%
P9058	Rbc, l/r, cmv-neg, irradiated	R	9533	9533	\$241.48	\$243.87	\$2.39	1%
P9059	Plasma, frz between 8-24hour	R	9513	9513	\$74.27	\$71.15	-\$3.12	-4%
P9060	Fr frz plasma donor retested	R	9503	9503	\$48.91	\$65.08	\$16.17	33%



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Table 1. Blood and Blood Products

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P9070	Pathogen reduced plasma pool	R	9534	9534	\$31.60	\$53.10	\$21.50	68%
P9071	Pathogen reduced plasma sing	R	9535	9535	\$78.38	\$122.82	\$44.44	57%
P9073	Platelets pheresis path redu	R	9536	9536	\$598.81	\$583.87	-\$14.94	-2%
P9099	Blood component/product noc	N	New code in CY2020.			\$7.99	-	-



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Table 2. Transfusion, Apheresis, and Stem Cell Procedures

HCPCS Code	Short Descriptor	2021 SI	2020 APC	2021 APC	Final 2020 Payment Rate	Proposed CY 2021 Payment Rate	\$ Change 2020-2021	% Change 2020-2021
36430	Blood transfusion service	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
36440	Bl push transfuse 2 yr/<	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
36450	Bl exchange/transfuse nb	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
36455	Bl exchange/transfuse non-nb	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
36456	Prtl exchange transfuse nb	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
36460	Transfusion service fetal	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
36511	Apheresis wbc	S	5242	5242	\$1,323.47	\$1,363.16	\$59.84	3%
36512	Apheresis rbc	S	5242	5242	\$1,323.47	\$1,363.16	\$59.84	3%
36513	Apheresis platelets	S	5241	5241	\$388.00	\$397.06	\$13.73	2%
36514	Apheresis plasma	S	5242	5242	\$1,323.47	\$1,363.16	\$59.84	3%
36516	Apheresis immunoads slctv	S	5243	5243	\$3,817.93	\$4,037.71	\$256.88	6%
36522	Photopheresis	S	5243	5243	\$3,817.93	\$4,037.71	\$256.88	6%
38205	Harvest allogeneic stem cell	B	Not paid under OPSS					
38206	Harvest auto stem cells	S	5242	5242	\$1,323.47	\$1,363.16	\$39.69	3%
38207	Cryopreserve stem cells	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38208	Thaw preserved stem cells	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38209	Wash harvest stem cells	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38210	T-cell depletion of harvest	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38211	Tumor cell deplete of harvest	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38212	Rbc depletion of harvest	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38213	Platelet deplete of harvest	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38214	Volume deplete of harvest	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38215	Harvest stem cell concentrate	S	5241	5241	\$388.00	\$397.06	\$9.06	2%
38220	Dx bone marrow aspirations	J1	5072	5072	\$1,372.45	\$1,407.00	\$34.55	3%
38221	Dx bone marrow biopsies	J1	5072	5072	\$1,372.45	\$1,407.00	\$34.55	3%
38222	Dx bone marrow bx & aspir	J1	5072	5073	\$2,318.63	\$2,370.01	\$51.38	2%
38230	Bone marrow harvest allogeneic	S	5242	5242	\$1,323.47	\$1,363.16	\$39.69	3%
38232	Bone marrow harvest autolog	S	5243	5243	\$3,817.93	\$4,037.71	\$219.78	6%
38240	Transplnt allo hct/donor	J1	5244	5244	\$37,431.71	\$31,838.13	-\$5,593.58	-15%
38241	Transplnt autol hct/donor	S	5242	5242	\$1,323.47	\$1,363.16	\$39.69	3%
38242	Transplnt allo lymphocytes	S	5242	5242	\$1,323.47	\$1,363.16	\$39.69	3%
38243	Transplj hematopoietic boost	S	5242	5242	\$1,323.47	\$1,363.16	\$39.69	3%
88184	Flowcytometry/ tc 1 marker	Q2	5673	5673	\$283.37	\$291.26	\$7.89	3%



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Table 2. Transfusion, Apheresis, and Stem Cell Procedures

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.
88189	Flowcytometry/read 16 & >	B	Not paid under OPPS.



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Table 3. Transfusion Laboratory Services

HCPCS Code	Short Descriptor	2021 SI	2020 APC	2021 APC	Final 2020 Payment	Final CY 2021 Payment Rate	\$ Change 2020-2021	% Change 2020-2021
86850	Rbc antibody screen	Q1	5671	5671	\$49.46	\$49.76	\$0.30	1%
86860	Rbc antibody elution	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86870	Rbc antibody identification	Q2	5673	5673	\$283.37	\$291.26	\$7.89	3%
86880	Coombs test direct	Q1	5732	5733	\$33.43	\$55.66	\$22.23	66%
86885	Coombs test indirect qual	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86886	Coombs test indirect titer	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86890	Autologous blood process	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86891	Autologous blood op salvage	Q1	5674	5674	\$628.13	\$656.15	\$28.02	4%
86900	Blood typing serologic abo	Q1	5734	5734	\$109.02	\$111.95	\$2.93	3%
86901	Blood typing serologic rh(d)	Q1	5732	5732	\$33.43	\$33.84	\$0.41	1%
86902	Blood type antigen donor ea	Q1	5673	5673	\$283.37	\$291.26	\$7.89	3%
86904	Blood typing patient serum	Q1	5732	5732	\$33.43	\$33.84	\$0.41	1%
86905	Blood typing rbc antigens	Q1	5673	5673	\$283.37	\$291.26	\$7.89	3%
86906	Bld typing serologic rh phnt	Q1	5732	5732	\$33.43	\$33.84	\$0.41	1%
86920	Compatibility test spin	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86921	Compatibility test incubate	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86922	Compatibility test antiglob	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86923	Compatibility test electric	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86927	Plasma fresh frozen	S	5672	5672	\$143.48	\$149.16	\$5.68	4%
86930	Frozen blood prep	Q1	5673	5673	\$283.37	\$291.26	\$7.89	3%
86931	Frozen blood thaw	Q1	5673	5673	\$283.37	\$291.26	\$7.89	3%
86932	Frozen blood freeze/thaw	Q1	5732	5732	\$33.43	\$33.84	\$0.41	1%
86945	Blood product/irradiation	Q1	5732	5732	\$33.43	\$33.84	\$0.41	1%
86950	Leukocyte transfusion	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86960	Vol reduction of blood/prod	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86965	Pooling blood platelets	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86970	Rbc pretx incubatj w/chemical	Q1	5732	5732	\$33.43	\$33.84	\$0.41	1%
86971	Rbc pretx incubatj w/enzymes	Q1	5673	5673	\$283.37	\$291.26	\$7.89	3%
86972	Rbc pretx incubatj w/density	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86975	Rbc serum pretx incubj drugs	Q1	5734	5735	\$109.02	\$270.22	\$161.20	148%
86976	Rbc serum pretx id dilution	Q1	5731	5731	\$22.98	\$24.67	\$1.69	7%
86977	Rbc serum pretx incubj/inhib	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86978	Rbc pretreatment serum	Q1	5732	5732	\$33.43	\$33.84	\$0.41	1%



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Table 3. Transfusion Laboratory Services

86985	Split blood or products	Q1	5672	5672	\$143.48	\$149.16	\$5.68	4%
86999	Transfusion procedure	Q1	5731	5731	\$22.98	\$24.67	\$1.69	7%
P9100	Pathogen test for platelets	S	1494	5732	\$35.50	\$33.84	-\$1.66	-5%
Q2041	Axicabtagene ciloleucel car+	G	9035	9035	\$395,380.000	\$395,380.000	\$0.00	0%
Q2042	Tisagenlecleucel car-pos t	G	9194	9194	\$441,508.391	\$429,813.310	-\$11,695.08	-3%