

Using the Data Contained in the Physician Fee Schedule Public Use Files

This brief document describes one example of how stakeholders might use the data contained within the public use files (PUF) available in the “download” section of the Physician Fee Schedule (PFS) rule website.

The CMS creates PFS rates by using established methodologies to develop Relative Value Units (RVUs) for each individual service and implement required adjustments to the PFS conversion factor (CF) to ensure that policy changes and changes to the RVUs are consistent with statutory budget neutrality requirements for the PFS.

Several stakeholders have inquired with CMS about using these publicly available files to determine how much the proposed rates for individual services contribute to our estimates of overall payments, and consequently, the required budget neutrality adjustment. In order to make these calculations, estimate (1) the total number of RVUs or anticipated total 2021 payments that would accrue to the individual service(s) and (2) the total number of RVUs or total 2021 payments under the PFS.

The total number of RVUs or anticipated total 2021 payments that would accrue to the individual service(s) can be calculated directly from two Notice of Proposed Rulemaking for Calendar Year 2021 (NPRM21) PUFs: “Appendix B”, which provides the RVUs, and “CY 2019 Utilization Crosswalk to CY 2021”, which provides the utilization needed for this calculation. The total number of RVUs is simply the product of the RVUs reported in Appendix B and the utilization for the service of interest. The utilization PUF reflects payment modifiers, such as MOD=50 for bilateral services, while RVUs only differ from the unmodified value for TC (technical component of a service) and 26 (professional component of a service) modifiers¹. The unmodified RVU value is appropriate for all values except TC and 26. Once the appropriate RVU value by facility is merged with the utilization for the service(s) of interest, take the product of each RVU (work, PE, MP) and its corresponding utilization and sum across the cases for the service by its HCPCS code. This summation or “pool” of RVUs multiplied by the NPRM21 CF of \$32.2605 is then the value of total payments for the service(s) under the 2021 RVUs and CF.

To identify the **total** number of RVUs or total 2021 payments under the PFS, the information described above must be aggregated for all codes, and must also be supplemented with the proposed payments for anesthesia services (HCPCS codes 00100-01999), which are not included in PFS Addendum B since they are paid under a different formula. The total pool of RVUs and payments must include these services and they are included in totals reported below.

The total RVUs (or payment) associated with the service(s) of interest can be divided into the total RVUs (or payment) used in establishing budget neutrality in the table below to calculate its/their share of total RVUs (or payment).

Please note that under the PFS, payment adjustments, including budget neutrality adjustments, are reflected through changes to both the RVUs assigned to each service and the CF. While the effect on total payments of, for example, eliminating payment for particular services can be estimated by the methods described above, the actual effect on the CF and RVUs of such a change would likely differ slightly from this estimate.

Table 1 illustrates the estimated spending effects for proposals described in the A-F pages (F. Refinements to Values for Certain Services to Reflect Revisions to Payment for Office/Outpatient Evaluation and

¹ Except for the 4 codes with MOD 53 reported in Addendum B

Management (E/M) Visits and Promote Payment Stability during the PHE for COVID-19 Pandemic) of the NPRM21. The first row of the table estimates total spending for all services included in budget neutrality. The CF dropped 10.61 percent from \$36.0896 to \$32.2605 based on all policy changes reflected in the NPRM21. If the CF did not change from 2020, overall spending would increase by \$ 11,437,340,235 or 10.6 percent of the 2021 total.

Table 1: Total 2021 RVUs and Total Payments for 2021 RVUs under Alternative CFs, Selected HCPCS Codes

Service (HCPCS Code)	Short Descriptor	Setting	Total 2021 Service RVU (Work + Practice Expense + Malpractice)	Total Payments Under NPRM21 RVUs and CF (\$32.2605)	Proposed estimated payment as a percent of total
<i>All Services Included in Budget Neutrality</i>		<i>All</i>	<i>N/A</i>	<i>\$96,360,584,643</i>	
				<i>(equals total payment under FR20 RVUs and CF)</i>	
99202	Office/outpatient visit	Non-Facility	2.14	\$160,304,277	0.17%
99202	Office/outpatient visit	Facility	1.43	\$14,155,664	0.01%
99203	Office/outpatient visit	Non-Facility	3.29	\$1,067,920,683	1.11%
99203	Office/outpatient visit	Facility	2.42	\$93,664,790	0.10%
99204	Office/outpatient visit	Non-Facility	4.94	\$1,431,418,970	1.49%
99204	Office/outpatient visit	Facility	3.96	\$197,173,880	0.20%
99205	Office/outpatient visit	Non-Facility	6.53	\$444,509,145	0.46%
99205	Office/outpatient visit	Facility	5.39	\$137,910,132	0.14%
99211	Office/outpatient visit	Non-Facility	0.69	\$55,626,802	0.06%
99211	Office/outpatient visit	Facility	0.27	\$1,165,888	0.00%
99212	Office/outpatient visit	Non-Facility	1.68	\$466,814,894	0.48%
99212	Office/outpatient visit	Facility	1.06	\$40,489,445	0.04%
99213	Office/outpatient visit	Non-Facility	2.69	\$7,000,127,462	7.26%
99213	Office/outpatient visit	Facility	1.96	\$652,744,034	0.68%
99214	Office/outpatient visit	Non-Facility	3.81	\$11,195,864,834	11.62%
99214	Office/outpatient visit	Facility	2.89	\$1,282,244,202	1.33%
99215	Office/outpatient visit	Non-Facility	5.34	\$1,338,492,759	1.39%
99215	Office/outpatient visit	Facility	4.27	\$355,701,171	0.37%
99XXX	Prolog off/op e/m ea 15	Non-Facility	0.97	\$27,554,285	0.03%
99XXX	Prolog off/op e/m ea 15	Facility	0.94	\$9,031,377	0.01%
GPC1X	Complex visit w med care	Non-Facility	0.49	\$2,533,780,963	2.63%

Service (HCPCS Code)	Short Descriptor	Setting	Total 2021 Service RVU (Work + Practice Expense + Malpractice)	Total Payments Under NPRM21 RVUs and CF (\$32.2605)	Proposed estimated payment as a percent of total
GPC1X	Complex visit w med care	Facility	0.49	\$401,256,868	0.42%
59400	Obstetrical care	Facility	72.01	\$6,265,867	0.01%
59410	Obstetrical care	Facility	31.8	\$817,623	0.00%
59425	Antepartum care only	Non-Facility	16.88	\$346,060	0.00%
59425	Antepartum care only	Facility	13.08	\$76,539	0.00%
59426	Antepartum care only	Non-Facility	30.82	\$825,483	0.00%
59426	Antepartum care only	Facility	23.9	\$147,206	0.00%
59430	Care after delivery	Non-Facility	7.89	\$216,235	0.00%
59430	Care after delivery	Facility	5.41	\$45,287	0.00%
59510	Cesarean delivery	Facility	79.55	\$5,871,571	0.01%
59515	Cesarean delivery	Facility	39.18	\$956,963	0.00%
59610	Vbac delivery	Facility	75.3	\$205,333	0.00%
59614	Vbac care after delivery	Facility	34.4	\$35,752	0.00%
59618	Attempted vbac delivery	Facility	80.41	\$60,028	0.00%
59622	Attempted vbac after	Facility	40.62	\$8,696	0.00%
90791	Psych diagnostic	Non-Facility	5.2	\$106,765,687	0.11%
90791	Psych diagnostic	Facility	4.46	\$38,304,096	0.04%
90792	Psych diag eval w/med	Non-Facility	5.82	\$55,005,554	0.06%
90792	Psych diag eval w/med	Facility	5.08	\$48,352,196	0.05%
90832	Psytx w pt 30 minutes	Non-Facility	2.26	\$124,324,743	0.13%
90832	Psytx w pt 30 minutes	Facility	1.98	\$35,524,019	0.04%
90834	Psytx w pt 45 minutes	Non-Facility	2.98	\$421,385,239	0.44%
90834	Psytx w pt 45 minutes	Facility	2.61	\$48,069,651	0.05%
90837	Psytx w pt 60 minutes	Non-Facility	4.38	\$797,691,828	0.83%
90837	Psytx w pt 60 minutes	Facility	3.85	\$37,472,848	0.04%
90951	Esrd serv 4 visits p mo	Non-Facility	34.69	\$3,252	0.00%
90951	Esrd serv 4 visits p mo	Facility	34.69	\$13,532	0.00%

Service (HCPCS Code)	Short Descriptor	Setting	Total 2021 Service RVU (Work + Practice Expense + Malpractice)	Total Payments Under NPRM21 RVUs and CF (\$32.2605)	Proposed estimated payment as a percent of total
90954	Esrd serv 4 vsts p mo 2-	Non-Facility	22.76	\$82,090	0.00%
90954	Esrd serv 4 vsts p mo 2-	Facility	22.76	\$380,953	0.00%
90955	Esrd srv 2-3 vsts p mo 2-	Non-Facility	15.34	\$2,369	0.00%
90955	Esrd srv 2-3 vsts p mo 2-	Facility	15.34	\$29,083	0.00%
90956	Esrd srv 1 visit p mo 2-11	Non-Facility	10.23	\$12,983	0.00%
90956	Esrd srv 1 visit p mo 2-11	Facility	10.23	\$34,008	0.00%
90957	Esrd srv 4 vsts p mo 12-	Non-Facility	22.74	\$562,539	0.00%
90957	Esrd srv 4 vsts p mo 12-	Facility	22.74	\$655,163	0.00%
90958	Esrd srv 2-3 vsts p mo 12-	Non-Facility	14.8	\$107,516	0.00%
90958	Esrd srv 2-3 vsts p mo 12-	Facility	14.8	\$91,989	0.00%
90959	Esrd serv 1 vst p mo 12-	Non-Facility	9.59	\$45,540	0.00%
90959	Esrd serv 1 vst p mo 12-	Facility	9.59	\$55,491	0.00%
90960	Esrd srv 4 visits p mo 20+	Non-Facility	10.44	\$707,449,644	0.73%
90960	Esrd srv 4 visits p mo 20+	Facility	10.44	\$29,308,633	0.03%
90961	Esrd srv 2-3 vsts p mo	Non-Facility	8.64	\$191,310,606	0.20%
90961	Esrd srv 2-3 vsts p mo	Facility	8.64	\$9,106,282	0.01%
90962	Esrd serv 1 visit p mo 20+	Non-Facility	5.93	\$38,737,541	0.04%
90962	Esrd serv 1 visit p mo 20+	Facility	5.93	\$2,548,953	0.00%
90963	Esrd home pt serv p mo	Non-Facility	17.89	\$62,826	0.00%
90963	Esrd home pt serv p mo	Facility	17.89	\$77,399	0.00%
90964	Esrd home pt serv p mo	Non-Facility	15.36	\$172,057	0.00%
90964	Esrd home pt serv p mo	Facility	15.36	\$305,694	0.00%
90965	Esrd home pt serv p mo	Non-Facility	14.75	\$431,451	0.00%
90965	Esrd home pt serv p mo	Facility	14.75	\$208,816	0.00%
90966	Esrd home pt serv p mo	Non-Facility	8.64	\$96,228,015	0.10%
90966	Esrd home pt serv p mo	Facility	8.64	\$4,149,895	0.00%
90968	Esrd svc pr day pt 2-11	Non-Facility	0.51	\$27,591	0.00%

Service (HCPCS Code)	Short Descriptor	Setting	Total 2021 Service RVU (Work + Practice Expense + Malpractice)	Total Payments Under NPRM21 RVUs and CF (\$32.2605)	Proposed estimated payment as a percent of total
90968	Esrd svc pr day pt 2-11	Facility	0.51	\$36,073	0.00%
90969	Esrd svc pr day pt 12-19	Non-Facility	0.49	\$31,999	0.00%
90969	Esrd svc pr day pt 12-19	Facility	0.49	\$30,707	0.00%
90970	Esrd svc pr day pt 20+	Non-Facility	0.28	\$8,145,999	0.01%
90970	Esrd svc pr day pt 20+	Facility	0.28	\$317,322	0.00%
92521	Evaluation of speech	Non-Facility	3.92	\$26,189	0.00%
92522	Evaluate speech	Non-Facility	3.3	\$358,738	0.00%
92523	Speech sound lang	Non-Facility	6.71	\$4,417,787	0.00%
92524	Behavral qualit analys	Non-Facility	3.22	\$1,881,361	0.00%
97161	Pt eval low complex 20	Non-Facility	2.95	\$144,507,473	0.15%
97162	Pt eval mod complex 30	Non-Facility	2.94	\$131,067,207	0.14%
97163	Pt eval high complex 45	Non-Facility	2.94	\$30,279,752	0.03%
97164	Pt re-eval est plan care	Non-Facility	2	\$38,590,643	0.04%
97165	Ot eval low complex 30	Non-Facility	3.02	\$14,383,001	0.01%
97166	Ot eval mod complex 45	Non-Facility	3.01	\$10,182,209	0.01%
97167	Ot eval high complex 60	Non-Facility	3	\$2,264,014	0.00%
97168	Ot re-eval est plan care	Non-Facility	2.04	\$2,333,894	0.00%
99283	Emergency dept visit	Facility	2.09	\$180,600,375	0.19%
99284	Emergency dept visit	Facility	3.57	\$607,925,026	0.63%
99285	Emergency dept visit	Facility	5.18	\$1,879,723,315	1.95%
99483	Assmt & care pln pt cog	Non-Facility	8.3	\$10,199,394	0.01%
99483	Assmt & care pln pt cog	Facility	5.75	\$1,025,556	0.00%
99495	Trans care mgmt 14 day	Non-Facility	6.12	\$129,108,527	0.13%
99495	Trans care mgmt 14 day	Facility	4.21	\$11,372,539	0.01%
99496	Trans care mgmt 7 day	Non-Facility	8.28	\$164,319,575	0.17%
99496	Trans care mgmt 7 day	Facility	5.73	\$10,624,884	0.01%