

2021 MPFS Final Rule – Nuclear Imaging 01.2021

On December 1, 2020, the Centers for Medicare and Medicaid Services (CMS) published the [2021 Final Rule for the Medicare Physician Fee Schedule](#).

General Highlights of the Proposed Rule

- Physicians will see a reduced conversion factor from \$36.09 to \$32.41, effective January 1st 2021. Societies including the ACR, ASNC and the SNMMI are working in support of legislation, [H.R. 8702](#) which would provide two years of relief for providers during this public health emergency.
- The Coronavirus Response and Relief Supplemental Consolidated Appropriations Act of 2021 was signed on December 27th. Highlights of the bill affecting the 2021 MPFS Final Rule include:
 - Relief from Medicare payment cuts as a result of planned E/M code changes that were to be implemented on January 1, 2021.
 - Delays the G2211 add-on code reimbursement for 3 years
- In response to the ongoing COVID-19 crisis, CMS is limiting the number of significant changes to the Quality Payment Program in 2021, including a delayed implementation timeline for the Merit-based Incentive Payment System (MIPS) Value Pathways (MVPs) until the 2022 performance period, and introducing the Alternative Payment Model (APM) Performance Pathway (APP) to align with the MVP framework

Medical Imaging Specific Highlights of the Proposed Rule

- CMS proposes no changes regarding implementation of the **Appropriate Use Criteria (AUC) Mandate** when ordering advanced imaging services (i.e., SPECT/PET MPI, CT and MR). The Educational and Operations Testing period during which there are no payment consequences will end on December 31, 2021.
- Medicare Administrative Contractor (MAC) will price the technical component of Myocardial PET services (CPT codes 78432, 78459, 78491, and 78492) consistent with other PET and PET/CT procedures for 2021.

Scope of Practice

- *CMS is making permanent the ability of nurse practitioners (NPs), clinical nurse specialists, (CNSs), physician assistants (PAs) and certified nurse-midwives (CNMs) to supervise the performance of diagnostic tests in addition to physicians. NPs, CNSs, PAs and CNMs are allowed to supervise the performance of diagnostic tests within their stated scope of practice and applicable state law, provided they maintain the required statutory relationships with supervising or collaborating physicians*