

## Another Year of Payment Cuts for Pathologists Projected in 2024

On July 13<sup>th</sup>, the Centers for Medicare and Medicaid Services (CMS) released its Medicare Physician Fee Schedule (MPFS) for 2024. The MPFS proposed rule is traditionally released in July, allows for a 60-day period for stakeholder comments and then is finalized around Thanksgiving, with a January 1<sup>st</sup> implementation date. The MPFS has a budget neutrality requirement, so annual changes affecting any one specialty will have a correlating effect on other physician specialties. Recently, revaluing Evaluation and Management (E/M) payments and coding have negatively affected specialists that do not provide those services. It looks like this trend is expected to continue next year. The following are the main points that affect pathologists in the 2024 MPFS proposed rule:

### Medicare proposes an overall 2% cut to pathology reimbursement in 2024

- The College of American Pathologists has released an [impact table](#) for evaluation of these cuts by CPT®/HCPCS code

### Updated Conversion Factor (CF) to \$32.7476, which is a 3.36% decline from 2023

- This includes adjustments for budget neutrality required due to Relative Value Unit (RVU) changes and new services implemented. Most notably, new E/M code G2211, an add-on code for ongoing, longitudinal care. This code was initially scheduled for implementation in 2021, but successful lobbying has staved it off.
- CMS expects code G2211 to be used on up to 54% of office visits

### Proposed 2024 MIPS reporting

- CMS proposes to raise the performance (pass/fail) threshold to 82 points
- Increase data completeness threshold to 75% for CY 2024-2026 and increase to 80% in CY 2027
- No new or deleted measures for 2024
- Increased attention on MIPS Value Pathways (MVPs), although none are applicable to pathologists at this time

### CLIA regulation requests for information

- CMS is seeking feedback on developing final regulations that would permanently allow pathologists to review slides remotely, allow for cytogeneticists to review images remotely and develop regulations around slide staining and tissue processing as a part of the CLIA certifications and regulations

APS will continue to monitor the MPFS 2024 proposed rule through finalization and provide updated information as it becomes available. Any topics requiring further breakout are provided as updates to this white paper or future white papers on the topic. The full-proposed rule is available [here](#).

If you have further questions, please contact your Practice Manager.