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#### Discolsures

No relative financial relationships to disclose

#### **Discussion Points**

- 1. 2025: Lower Rates, Higher Scrutiny
- 2. Hospital vs Office Site Neutral
- 3. More Hoops, Fewer Approvals
- 4. WISeR: CMS AI-Driven Prior Auth Pilot
- 5. MIPS 2025: What's New and What Matters
- 6. MIPS Value Pathway (MVP): The Future of Physician Scoring
- 7. Billing & Coding Hot Spots

### 2025: Lower Rates, Higher Scruting

- → 2025 Medicare PFS:  $\approx$  –2.9 % overall cut
- → Procedure-heavy specialties hit hardest
- → Inflation + staff + supply costs up
- → Commercial payers mirroring CMS
- → AI-driven audits increasing

# 2025 Fee Schedule/Sequestration

- → 2.9% cut for 2025
- → 5 years of consecutive cuts
- → Approximately 10% overall in last 5 years
- → Conversion factor \$34.89 to \$32.34
- → No inflation adjustment

#### **RVU**

#### RVU x Conversion Factor = Payment

- → **RVU:** The total RVU is the sum of three components:
  - Work RVUs (physician's effort)
  - Practice Expense (PE) RVUs (overhead costs)
  - ◆ Malpractice (MP) RVUs (malpractice insurance costs)
- → Calculation: The formula is applied as follows:
- → Payment = (Total RVU) x (Conversion Factor)
- → With GPCI adjustments:
  - A more comprehensive formula also includes Geographic Practice Cost Indices (GPCI) to account for regional cost differences:
- → Payment = [(Work RVUs x Work GPCI) + (PE RVUs x PE GPCI) + (Malpractice RVUs x Malpractice GPCI)] x CF

#### Inflation Pressure

2020 - 1.23%

2021 - 4.70%

2022 - 8%

2023 - 4.12%

Average annual inflation - 4.59%

In other words \$1 in 2020 is the equivalent of \$1.25

#### **Commercial Plans**

- → Update their fee schedules 3 6 months after CMS
- → Auto-downward adjustments rate drops automatically!
- → Must check your contracts regularly

#### Al Driven Audits

- → Predictive claim scoring pattern review
- → "Pattern inconsistent with peer utilization"
- → Best defense functional improvements!
- → A1 then Nurse then Physician of any specialty
- → Documentation must tell a story!
- → Function, Safety, Progression

Where have you felt the biggest squeeze — Reimbursements, delays, or denials?

### Hospital vs Office Site Neutral

- CMS pushing site-neutral payment: hospital outpatient rates falling
- ASC / office settings favored for cost efficiency
- Physicians paid less for HOPD procedures
- Shift feasible cases to ASC or office to protect margins

- Have you seen payers discourage hospital -based cases or reduce those rates?
- Would this practice re -shape your current practice?

### More Hoops, Fewer Approvals

- CMS PA Rule (2026): 72 hr urgent / 7-day routine deadline
- Texas Gold Card law offers PA exemption for high-approval providers
- Payers adding AI triage and peer reviews
- Documentation burden up 20–30 %

Has anyone successfully leveraged the Gold Card exemption yet?

## WISeR: CMS ADriven Prior Auth Pilot — Texas Included

- Launch Jan 1 2026 Dec 31 2031 (TX, AZ, OK, OH, NJ, WA)
- Applies only to Original Medicare FFS (not Medicare Advantage)
- Two paths: pre-service PA or postservice pre-payment review
- High affirmation → Gold Card status inside model
- Medicare Advantage (MA) plans have separate PA rules but must follow Medicare coverage policies

## WISeRTargeted Procedures for Pain Medicine

- Epidural Steroid Injections (non-facet)
- Spinal Cord & Peripheral Nerve Stimulator implants/trials
- Percutaneous Vertebral Augmentation (kypho/vertebroplasty)
- Image-Guided Lumbar Decompression for stenosis
- Neuroablative / Lesion procedures (RF tract lesions)

- Which of these do you perform most often?
  - Is your documentation audit-proof?

## MIPS 2025: What's New and What Matters

- Performance threshold = 75 points (-9% penalty, small bonuses)
- Quality 30% | Cost 30% | PI 25% | IA 15%
- Data completeness = 75%
- MVPs expanding pain physicians urged to migrate before 2027
- EHR Cures Update 2023 required for PI
- Cost measures now include spine & imaging episodes

- Who's still in traditional MIPS?
- Anyone testing an MVP?
- How much has reporting changed?

# MIPS Value Pathway (MVP): The Future of Physician Scoring

- CMS's new specialty-focused version of MIPS
- Bundles Quality, Cost, IA, PI into one cohesive pathway
- Compares you to peers in your specialty, not all clinicians
- Fewer, more relevant measures; less admin burden
- Pain-relevant MVPs: Musculoskeletal

- Who's planning to test an MVP in 2025?
- This will define how pain specialists are measured and paid — for years ahead!

## Billing & Coding Hot Spots

- Facet Joint LCD L38803 + Article A58405 (1/1/25) tightening criteria
- Must document failed conservative care + functional improvement
- Modifiers 25 & 59 under audit
- Telehealth E/M: confirm POS + time accuracy

• What coding issues or payer audits are costing you time this year?