

**Powers Memo on
CMS Proposes 2022 Physician Fee Schedule Rate
for Transplantation and Other Physicians' Services
July 2021**

CMS has proposed policy and payment changes for the 2022 Physician Fee Schedule (PFS). The proposal includes minimal changes in the Relative Value Units (RVUs) for transplant procedures; however, because the conversion factor (used to “convert” RVUs into payment rates) will be reduced by an estimated 3.75%, Medicare payment for transplant procedures will decrease slightly if the proposal is finalized without change. (The current conversion factor is \$34.8931 and the proposed 2022 conversion factor is \$33.5848). A chart setting forth the percentage changes (in RVUs and payment rates) for transplant procedures accompanies this notice (see below).

The conversion factor reduction results from the need to maintain budget neutrality for increases in Medicare payment for evaluation and management (E&M) services. The E&M RVU increases were implemented this year, but Congress mitigated the impact of the reduction this year. ASTS is joining with other professional societies in an effort to convince Congress to mitigate the impact of the conversion factor reduction in 2022 as well.

2021 RVUs Compared to Proposed 2022 PFS Proposed Rule

CPT¹/ HCPCS	Description	% Diff RVUs	2022 (P) \$	2021 (F) \$	% Diff \$
32851	Lung transplant, single	335707%	\$ 3,118.17		0%
32852	Lung transplant with bypass	367041%	\$ 3,409.21		0%
32853	Lung transplant, double	468405%	\$ 4,350.72		0%
32854	Lung transplant with bypass	496843%	\$ 4,614.86		0%
33935	Transplantation, heart/lung	505427%	\$ 4,694.59		0%
33945	Transplantation of heart	497576%	\$ 4,621.67		0%
47122	Extensive removal of liver	354060%	\$ 3,288.64	\$ 3,540.60	100%
47125	Partial removal of liver	318155%	\$ 2,955.14	\$ 3,181.55	100%
47130	Partial removal of liver	342197%	\$ 3,178.45	\$ 3,421.97	100%
47135	Transplantation of liver	555638%	\$ 5,160.97	\$ 5,556.38	100%
47140	Partial removal, donor liver	2%	\$	\$	\$

			3,428.65	3,691.34	(262.69)
47141	Partial removal, donor liver	1%	\$ 4,098.24	\$ 4,412.23	\$ (313.99)
47142	Partial removal, donor liver	1%	\$ 4,515.36	\$ 4,861.31	\$ (345.95)
47146	Prep donor liver/venous	0%	\$ 313.73	\$ 337.77	\$ (24.04)
47147	Prep donor liver/arterial	0%	\$ 365.58	\$ 393.59	\$ (28.01)
48552	Prep donor pancreas/venous	0%	\$ 225.90	\$ 243.20	\$ (17.31)
48554	Transpl allograft pancreas	4%	\$ 2,492.33	\$ 2,683.28	\$ (190.95)
50320	Remove kidney, living donor	4%	\$ 1,456.83	\$ 1,568.44	\$ (111.62)
50327	Prep renal graft/venous	0%	\$ 207.42	\$ 223.32	\$ (15.89)
50328	Prep renal graft/arterial	0%	\$ 181.17	\$ 195.05	\$ (13.88)
50329	Prep renal graft/ureteral	-1%	\$ 172.42	\$ 185.63	\$ (13.21)
50340	Removal of kidney	4%	\$ 919.47	\$ 989.92	\$ (70.45)
50360	Transplantation of kidney	2%	\$ 2,329.95	\$ 2,508.46	\$ (178.51)
50365	Transplantation of kidney	3%	\$ 2,768.79	\$ 2,980.92	\$ (212.13)
50370	Remove transplanted kidney	3%	\$ 1,166.44	\$ 1,255.80	\$ (89.37)
50380	Reimplantation of kidney	3%	\$ 1,951.41	\$ 2,100.91	\$ (149.51)