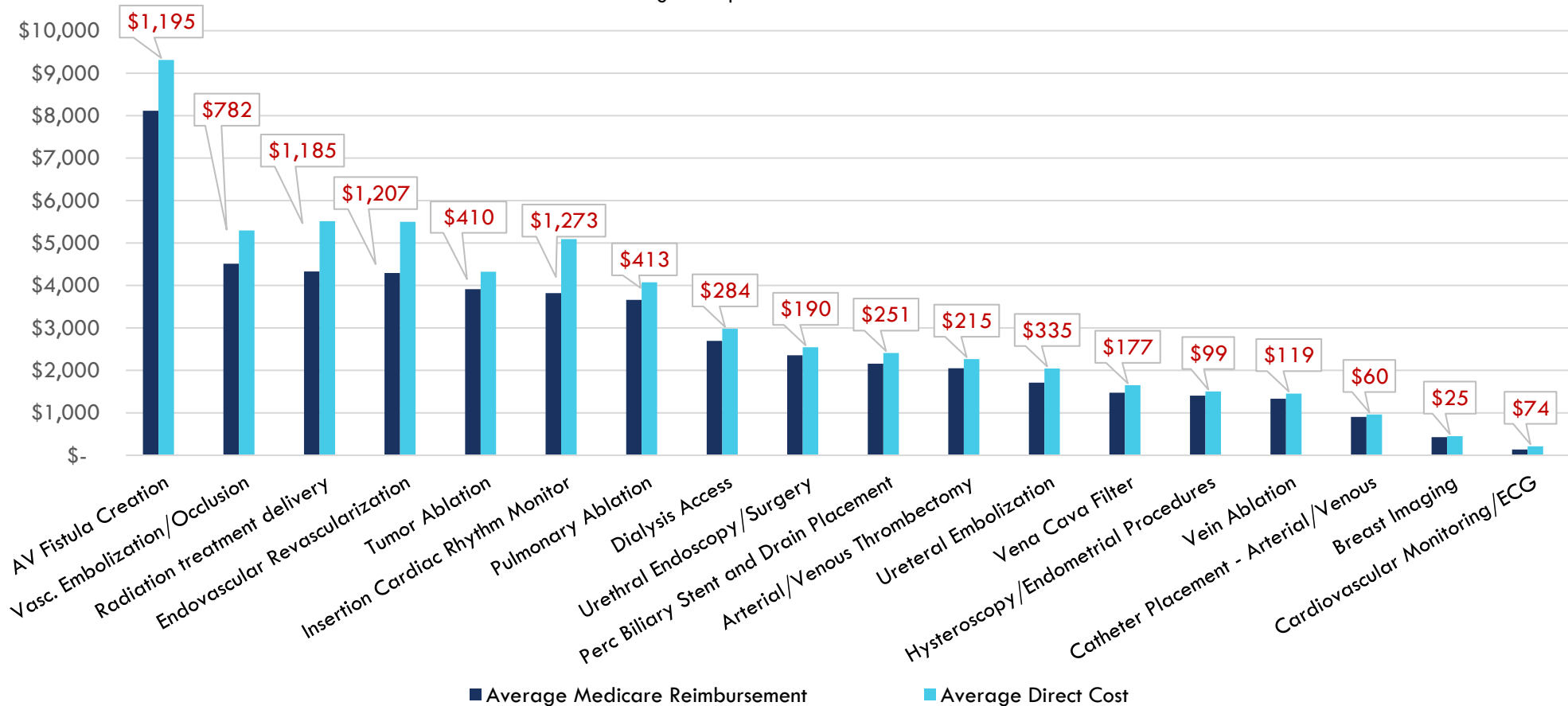


Medicare Physician Fee Schedule Reimbursement is Less Than Costs for At Least 300 Office-Based Interventional and Related Services in the PFS

In 2024, according to CMS data, there are 195 CPT codes for which total reimbursement is less than their direct costs. In other words, payment is insufficient for these codes before even considering the added costs associated with indirect costs, provider work, and malpractice insurance. *In the 2025 PFS Proposed Rule, this number would grow to 300, an increase of 50%*

Representative Examples Range Across Service Lines

*Callouts show average loss per CPT code in each service line



1. Data is based on 2025 Physician Fee Schedule Proposed Rule Total Non-Facility Reimbursement and Total Direct Costs.

2. Radiation Treatment Delivery data assumes 25 fractions for typical prostate cancer patient. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9441303/>.

300 CPT Codes where Total Reimbursement < Direct Costs in the PFS

10036	Plmt sft tiss loclzj dev ea	37186	Sec art thrombectomy add-on	50389	Remove renal tube w/fluoro	78140	Red cell sequestration	88185	Flowcytometry/tc add-on	93986	Dup-scan hemo compl uni std
19086	Bx breast add lesion mr imag	37187	Venous mech thrombectomy	50431	Njx px nfrosgrm &/ urtrgrm	78185	Spleen imaging	88313	Special stains group 2	93990	Doppler flow testing
19286	Perq dev breast add us imag	37188	Ven mechnl thrmbc repeat tx	50434	Convert nephrostomy catheter	78191	Platelet survival	88314	Histochemical stains add-on	94015	Patient recorded spirometry
19288	Perq dev breast add mr guide	37191	Ins endovas vena cava filtr	50435	Exchange nephrostomy cath	78201	Liver imaging	88346	Imflur 1st 1antb stain px	94644	Cbt 1st hour
20983	Ablate bone tumor(s) perq	37192	Redo endovas vena cava filtr	50592	Perc rf ablate renal tumor	78202	Liver imaging with flow	88361	Tumor immunohistochem/comput	94664	Evaluate pt use of inhaler
21125	Augmentation lower jaw bone	37193	Rem endovas vena cava filter	50593	Perc cryo ablate renal tum	78215	Liver and spleen imaging	88364	Insitu hybridization (fish)	94669	Mechanical chest wall oscill
21127	Augmentation lower jaw bone	37197	Remove intrvas foreign body	50705	Ureteral embolization/occl	78226	Hepatobiliary system imaging	88367	Insitu hybridization auto	94761	Measure blood oxygen level
21215	Lower jaw bone graft	37220	Iliac revasc	52284	Cysto rx balo cath urtl strx	78227	Hepatobil syst image w/drug	88369	M/phmtrc alyshquant/semi	94762	Measure blood oxygen level
22527	Idet 1 or more levels	37221	Iliac revasc w/stent	52442	Cystourethro w/addl implant	78231	Serial salivary imaging	88373	M/phmtrc alyshquant/semi	95012	Exhaled nitric oxide meas
27278	Arthrd si jt prq wo tfxj dev	37222	Iliac revasc add-on	53855	Insert prost urethral stent	78232	Salivary gland function exam	88374	M/phmtrc alyshquant/semi	95024	Icut allergy test drug/bug
31627	Navigational bronchoscopy	37223	Iliac revasc w/stent add-on	53860	Transurethral rf treatment	78261	Gastric mucosa imaging	88377	M/phmtrc alyshquant/semi	95065	Nose allergy test
31634	Bronch w/balloon occlusion	37224	Fem/popl revas w/tla	55873	Cryoablate prostate	78264	Gastric emptying imag study	88381	Microdissection manual	95070	Bronchial allergy tests
31652	Bronch ebus sampling 1/2 node	37225	Fem/popl revas w/ather	55874	Tprnl plmt biodegradabl matrl	78265	Gastric emptying imag study	89230	Collect sweat for test	95145	Antigen therapy services
32408	Core ndl bx lng/med perq	37226	Fem/popl revasc w/stent	58340	Catheter for hystero	78266	Gastric emptying imag study	91065	Breath hydrogen/methane test	95146	Antigen therapy services
32994	Ablate pulm tumor perq crybl	37227	Fem/popl revasc stnt & ather	58353	Endometr ablate thermal	78278	Acute gi blood loss imaging	92977	Dissolve clot heart vessel	95147	Antigen therapy services
32998	Ablate pulm tumor perq rf	37228	Tib/per revasc w/tla	58356	Endometrial cryoablation	78290	Meckels divert exam	93005	Electrocardiogram tracing	95148	Antigen therapy services
33285	Insj subq car rhythm mntr	37229	Tib/per revasc w/ather	58558	Hysteroscopy biopsy	78300	Bone imaging limited area	93017	Cardiovascular stress test	95149	Antigen therapy services
36005	Injection ext venography	37230	Tib/per revasc w/stent	58563	Hysteroscopy ablation	78306	Bone imaging whole body	93225	Ecg monit/reprt up to 48 hrs	95782	Polysom <6 yrs 4/> paramtrs
36010	Place catheter in vein	37231	Tib/per revasc stent & ather	58565	Hysteroscopy sterilization	78315	Bone imaging 3 phase	93226	Ecg monit/reprt up to 48 hrs	95783	Polysom <6 yrs cpap/bilvl
36011	Place catheter in vein	37232	Tib/per revasc add-on	58580	Transcrv abltj utrn fibrnd rf	78451	Ht muscle image spect sing	93229	Remote 30 day ecg tech supp	95807	Sleep study attended
36012	Place catheter in vein	37234	Revasc opn/prq tib/pero stent	5X007	Ablt trurl prst8 tis thrm us	78452	Ht muscle image spect mult	93241	Ext ecg>48hr<7d rec scan a/r	95808	Polysom any age 1-3> param
36013	Place catheter in artery	37235	Tib/per revasc stnt & ather	5X008	Ablt trurl prst8 tis trnsdcr	78456	Acute venous thrombus image	93242	Ext ecg>48hr<7d recording	96446	Chemotx admn pertl cav impl
36014	Place catheter in artery	37236	Open/perq place stent 1st	5XX05	Cysto insj dev ischmc rmdlg	78457	Venous thrombosis imaging	93243	Ext ecg>48hr<7d scan a/r	98975	Rem ther mntr 1st setup&edu
36015	Place catheter in artery	37237	Open/perq place stent ea add	70390	X-ray exam of salivary duct	78468	Heart infarct image (ef)	93245	Ext ecg>7d<15d rec scan a/r	98977	Rem ther mntr dv sply mscskl
36140	Intro ndl icath upr/lxtr art	37238	Open/perq place stent same	74251	X-ray xm sm int 2cntrst std	78579	Lung ventilation imaging	93246	Ext ecg>7d<15d recording	99153	Mod sed same phys/ qhp ea
36160	Establish access to aorta	37239	Open/perq place stent ea add	74400	Urography iv +-kub tomog	78598	Lung perf&ventilat diferentl	93247	Ext ecg>7d<15d scan a/r	99454	Rem mntr physiol param dev
36200	Place catheter in aorta	37241	Vasc embolize/occlude venous	74415	Urography nfs drip&/bls w/nf	78600	Brain image <4 views	93268	Ecg record/review	99459	Pelvic examination
36221	Place cath thoracic aorta	37242	Vasc embolize/occlude artery	75600	Contrast exam thoracic aorta	78601	Brain image w/flow <4 views	93270	Remote 30 day ecg rev/report	G0166	Extrnl counterpulse, per tx
36245	Ins cath abd/l-ext art 1st	37243	Vasc embolize/occlude organ	75901	Remove cva device obstruct	78606	Brain image w/flow 4 + views	93271	Ecg/monitoring and analysis	G0238	Oth resp proc, indiv
36247	Ins cath abd/l-ext art 3rd	37244	Vasc embolize/occlude bleed	77078	Ct bone density axial	78610	Brain flow imaging only	93296	Rem interrog evl prm/ids	G0239	Oth resp proc, group
36251	Ins cath ren art 1st unilat	37246	Trluml balo angiop 1st art	77290	Set radiation therapy field	78630	Cerebrospinal fluid scan	93325	Doppler color flow add-on	G0249	Provide inr test murg/equip
36252	Ins cath ren art 1st bilat	37252	Intrvasc us noncoronary 1st	77336	Radiation physics consult	78635	Csf ventriculography	93451	Right heart cath	G0288	Recon, cta for surg plan
36253	Ins cath ren art 2nd+ unilat	40806	Incision of lip fold	77370	Radiation physics consult	78645	Csf shunt evaluation	93454	Coronary artery angio s&i	G0341	Percutaneous islet celltrans
36254	Ins cath ren art 2nd+ bilat	47382	Percut ablate liver rf	77372	Srs linear based	78650	Csf leakage imaging	93668	Peripheral vascular rehab	G2082	Visit esketamine 56m or less
36465	Njx noncmpnd sclrsnt 1 vein	47383	Perq abltj lvr cryoablation	77373	Sbrt delivery	78660	Nuclear exam of tear flow	93701	Bioimpedance cv analysis	G2083	Visit esketamine, > 56m
36466	Njx noncmpnd sclrsnt mlt vn	47531	Injection for cholangiogram	77417	Radiology port images(s)	78700	Kidney imaging morphol	93786	Ambl bp mntr w/sw rec only	G6003	Radiation treatment delivery
36473	Endovenous mchnchem 1st vein	47536	Exchange biliary drg cath	77610	Hyperthermia treatment	78801	Rp loclzj tum 2+area 1+d img	93792	Pt/caregiver traing home inr	G6004	Radiation treatment delivery
36481	Insertion of catheter vein	47537	Removal biliary drg cath	77615	Hyperthermia treatment	78802	Rp loclzj tum whbdy 1 d img	93880	Extracranial bilat study	G6005	Radiation treatment delivery
36482	Endoven ther chem adhes 1st	47538	Perq plmt bile duct stent	77790	Radiation handling	78803	Rp loclzj tum spect 1 area	93922	Upr/l xtremity art 2 levels	G6006	Radiation treatment delivery
36572	Insj picc rs&i <5yr	47539	Perq plmt bile duct stent	78013	Thyroid imaging w/blood flow	78804	Rp loclzj tum whbdy 2+d img	93923	Upr/lxtr art stdy 3+ lvs	G6007	Radiation treatment delivery
36584	Compl rplcmt picc rs&i	47540	Perq plmt bile duct stent	78014	Thyroid imaging w/blood flow	78808	lv inj ra drug dx study	93924	Lwr xtr vasc stdy bilat	G6008	Radiation treatment delivery
36836	Prq av fstl crtj uxtx 1 acs	47544	Removal duct glbldr calculi	78016	Thyroid met imaging/studies	78830	Rp loclzj tum spect w/ct 1	93925	Lower extremity study	G6009	Radiation treatment delivery
36837	Prq av fstl crtj uxtx sep acs	49185	Sclerotx fluid collection	78018	Thyroid met imaging body	78831	Rp loclzj tum spect 2 areas	93926	Lower extremity study	G6010	Radiation treatment delivery
36903	Intro cath dialysis circuit	49423	Exchange drainage catheter	78070	Parathyroid planar imaging	78832	Rp loclzj tum spect w/ct 2	93930	Upper extremity study	G6011	Radiation treatment delivery
36904	Thrmcb/nfs dialysis circuit	49424	Assess cyst contrast inject	78075	Adrenal cortex & medulla img	7XX00	Mr sfty implt&/fb asmt stf 1	93931	Upper extremity study	G6012	Radiation treatment delivery
36906	Thrmcb/nfs dialysis circuit	49446	Change g-tube to g-j perc	78103	Bone marrow imaging mult	7XX01	Mr sfty implt&/fb asmt stf ea	93970	Extremity study	G6013	Radiation treatment delivery
36908	Stent plmt ctr dialysis seg	49450	Replace g/c tube perc	78110	Plasma volume single	86486	Skin test unlisted antigen ea	93971	Extremity study	G6014	Radiation treatment delivery
36909	Dialysis circuit embolj	49451	Replace duod/jej tube perc	78120	Red cell mass single	88120	Cytp urine 3-5 probes ea spec	93978	Vascular study	G6015	Radiation tx delivery imrt
37183	Revision tips	49452	Replace g/j tube perc	78121	Red cell mass multiple	88121	Cytp urine 3-5 probes cmptx	93979	Vascular study	G6016	Delivery comp imrt
37184	Prim art m-thrmcb 1st vsl	50387	Change nephroureteral cath	78130	Red cell survival study	88184	Flowcytometry/ tc 1 marker	93985	Dup-scan hemo compl bi std	Q0092	Set up port xray equipment