

**OMFS Update for Physician and Non-Physician Practitioner Services
Explanation of Changes to Regulation to Adopt 01-22-2020 GPCI Correction
(Effective January 1, 2020)**

1. Data Sources

The Center for Medicare and Medicaid Services' (CMS) CY 2020 update to the Medicare physician fee schedule was published in the Federal Register on November 15, 2019 (84 Fed. Reg. 62568), "CY 2020 Medicare Physician Fee Schedule Final Rule, CMS-1715-F."

Thereafter, CMS made corrections to the Geographic Practice Cost Index (GPCI). The revised GPICs are set forth in the Relative Value Unit zip file, [RVU20A \(Updated 01/22/2020\)](#), in the GPCI2020 document. The GPCI values are also set forth in CMS' revised Addendum E to the Final Rule, entitled "[Addendum E Geographic Practice Cost Indices \(GPICs\) CY2020 CMS 1715-F with WorkFloor 09Jan2020](#)". The RVU20A (Updated 01-22-202) and the revised Addendum E are relied upon in adopting the corrections to sections 9789.19 and 9789.19.1.

The CMS' [2020 Anesthesia Conversion Factors \(ZIP\)](#) file, sets forth the Anesthesia Shares (which are unchanged from the originally adopted anesthesia shares) and sets forth the corrected GPCI locality values for Physician Work, Practice Expense, and Malpractice in the document: CMS-1715-F_CY2020_ANES_locality adjusted_CF_withWorkFloor_09JAN2020 . This document sets forth the same GPCI locality values for Physician Work, Practice Expense, and Malpractice that are set forth in the RVU20A (Updated 01/22/2020), and the Addendum E revised 01/09/2020. The documents are relied upon in adopting the corrections to sections 9789.19 and 9789.19.1.

2. Revisions Adopted by Update Order to Conform to Medicare 01-22-2020 Correction

Update Table

Title 8 CCR §9789.19: The following sets forth an explanation of revisions to subdivision (g), adopting updates for services rendered on or after January 1, 2020, to conform to Medicare corrections to the GPCI locality values for Physician Work, Practice Expense, and Malpractice, as follows.

Document/Data Revised by AD Order	Explanation of Revision
Adjustment Factors - Anesthesia	Added language to reference the revised Table A for anesthesia, which is based upon the 01/22/2020 corrected RVU20A file.
CMS' Medicare National	Added language to identify the 01/22/2020

Document/Data Revised by AD Order	Explanation of Revision
Physician Fee Schedule Relative Value File [Zip]	corrected RVU20A file. Revised the document name of the RVU20A PDF to remove “-508” to conform to revised CMS document name.
Conversion Factors adjusted for MEI and Relative Value Scale adjustment factor	<p>The Conversion Factor for anesthesia, as adjusted for the relative value scale budget neutrality adjustment, the practice expense and malpractice adjustment and the MEI, to calculate the updated anesthesia conversion factor for 2020 remains unchanged at \$28.12. The GPCI corrections impact the 2020 GPCI-Adjusted Anesthesia Conversion Factors by locality set forth in Table A. Language is added to identify the corrected Table A.</p> <p>“Other Services Conversion Factor” remains unchanged. The GPCI adjustments for Other Services are used in the formula for calculating the fee, applied to Physician Work, Practice Expense, and Malpractice; they are not incorporated into the Conversion Factor.</p>
Diagnostic Cardiovascular Procedure CPT codes subject to the MPPR	Added language to identify the 01/22/2020 corrected RVU20A zip file name. The PPRRVU20_Jan document which is included in the RVU20A 01/22/2020 zip file has not been modified; the data remains the same.
Diagnostic Imaging Family Indicator Description	Added language to identify the 01/22/2020 corrected RVU20A file. Revised the document name of the RVU20A PDF to remove “-508” to conform to revised CMS document name.
Diagnostic Imaging Family Procedures Subject to the MPPR	Added language to identify the 01/22/2020 corrected RVU20A file name. The PPRRVU20_Jan document which is included in the RVU20A 01/22/2020 zip file has not been modified; the data remains the same.
Diagnostic Imaging Multiple Procedures Subject to the MPPR	Added language to identify the 01/22/2020 corrected RVU20A file name. The PPRRVU20_Jan document which is included in the RVU20A 01/22/2020 zip file has not been

Document/Data Revised by AD Order	Explanation of Revision
	modified; the data remains the same.
Geographic Practice Cost Index (GPCI) by locality (Other than anesthesia services)	Added language to identify the 01/22/2020 corrected RVU20A file name. The GPCI2020 document contains the corrected Physician Work, Practice Expense, and Malpractice values.
Geographic Practice Cost Index (GPCIs) by locality and anesthesia shares (Anesthesia)	<p>Added language to identify the name of the Table A updated to adopt the 01/22/2020 corrected RVU20A file.</p> <p>Added language to identify the revised Medicare GPCI data utilized as set forth in the file 2020 Anesthesia Conversion Factors [ZIP], in the document CMS-1715-F_CY2020_ANES_locality adjusted_CF_withWorkFloor_09JAN2020 and corrected Addendum E to the Final Rule.</p> <p>Added language to identify the 01/22/2020 corrected RVU20A file name. The County to Locality Index document (20LOCCO) which is included in the RVU20A 01/22/2020 zip file has not been modified; the data remains the same.</p>
Incident To Codes	Added language to identify the 01/22/2020 corrected RVU20A zip file. The PPRRVU20_Jan document which is included in the RVU20A 01/22/2020 zip file has not been modified; the data remains the same.
Ophthalmology Procedure CPT codes subject to the MPPR	Added language to identify the 01/22/2020 corrected RVU20A zip file. The PPRRVU20_Jan document which is included in the RVU20A 01/22/2020 zip file has not been modified; the data remains the same.
Physical Therapy Multiple Procedure Payment Reduction: “Always Therapy” Codes; and Acupuncture and Chiropractic Codes	Added language to identify the 01/22/2020 corrected RVU20A zip file. The PPRRVU20_Jan document which is included in the RVU20A 01/22/2020 zip file has not been modified; the data remains the same.

Table A
Title 8 CCR §9789.19.1:

GPCI-Adjusted Conversion Factors for Anesthesia Services – Section 9789.19.1 Table A 2020, RVU20A, updated 01/22/2020 for services on or after January 1, 2020

For anesthesia services, the GPCI adjustments are incorporated into the anesthesia conversion factors. Table A adopted pursuant to section 9789.19.1 contains the anesthesia conversion factors adjusted by Medicare locality GPCIs and anesthesia shares for anesthesia services rendered on or after January 1, 2020. This Order adopts a revised Table A to utilize the CMS' corrected GPCIs in place of the GPCIs initially published.

The workers' compensation 2020 Anesthesia Conversion Factor, before GPCI adjustment, remains 28.1215, which includes the adjustments for Medicare Economic Index inflation rate and Relative Value Scale Adjustment factors.

The 2020 Medicare Anesthesia Shares are applied to the corrected Work GPCI, Practice Expense GPCI, and Malpractice GPCI to derive the GPCI-Adjusted Anesthesia Conversion Factors by locality. The formula is as follows.

$$[(\text{Work GPCI by locality} * \text{Anesthesia Work Share}) + (\text{Practice Expense GPCI by locality} * \text{Anesthesia Practice Expense Share}) + (\text{Malpractice GPCI by locality} * \text{Anesthesia Malpractice Share})] * \text{Anesthesia Conversion Factor of } \$28.1215]$$

The anesthesia shares for 2020 are unchanged by the CMS January 22, 2020 correction. They remain as originally adopted, as follows.

Work	PE	MP
0.785	0.154	0.061

The January 22, 2020 corrected 2020 Work GPCI, 2020 Practice Expense GPCI, 2020 Malpractice GPCI, and the anesthesia shares are obtained from the Medicare [RVU20A \(Updated 01/22/2020\) \(ZIP\)](#), GPCI2020 document and the [2020 Anesthesia Conversion Factors \(ZIP\)](#) document, which may be accessed on the CMS website. Both of these documents incorporate the revised GPCI Physician Work, Practice Expense and Malpractice values contained in the CMS' revised Addendum E to the Final Rule, entitled "[Addendum E Geographic Practice Cost Indices \(GPCIs\) CY2020 CMS 1715-F with WorkFloor 09Jan2020](#)".