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# Issue Brief

FEDERAL ISSUE BRIEF



*Analysis provided for MHA by Larry Goldberg, Goldberg Consulting*

**May 15, 2025**

## **CMS Issues Correction Notice to the Final CY 2025 Physician Fee Schedule**

The Centers for Medicare and Medicaid Services (CMS) have released a correction rule to the CY 2025 Physician Fee Schedule.

A copy of the 29-page document is currently on public display at the **Federal Register** office and is scheduled for publication on May 16.

The display version is available at: <https://public-inspection.federalregister.gov/2025-08676.pdf>.

The above link will change tomorrow.

For the most part, the rule simply corrects typographical errors. The CY 2025 PFS final rule corrections indicated in the document are applicable beginning January 1, 2025.

### **Comment**

One must question why it has taken CMS 5 months to issue this rule.

Reported below are selected items that have changed values.

### **Summary and Corrections of Errors in the Addenda on the CMS Website**

In Addendum B, column L, row 13679, the Global indicator for HCPCS code G0560 that reads "ZZZ" is corrected to read "XXX."

### **Correction of Errors in the Preamble of the CY 2025 PFS Final Rule**

In "Table 13: The Medicare Telehealth Originating Site Facility Fee", third column (2025 Facility Fee for Q3014), last row, the figure "\$31.04" is corrected to read "\$31.01".

CMS is establishing HCPCS code G0564 (Creation of subcutaneous pocket with insertion of 365-day implantable interstitial glucose sensor, including system activation and patient training) and G0565 (removal of implantable interstitial glucose sensor with creation of subcutaneous pocket at different anatomic site and insertion of new 365-day implantable sensor, including system activation).

On page 98078 of the final rule, third column, first partial paragraph, lines 19 through 24, the phrase “differences in minimum time between monthly dosing (26 days for Sublocade® versus 28 days for monthly Brixadi®), and differences in buprenorphine half-lives (19–26 days for Sublocade® versus 43–60 days for Brixadi®)” is corrected to read “differences in monthly dosing intervals (26 to 44 days for Sublocade® versus 21 to 35 days for monthly Brixadi®), and differences in buprenorphine half- lives (43 to 60 days for Sublocade® versus 19 to 26 days for Brixadi®)”.

“TABLE 39: Measures Included in the APP Plus Quality Measure Set for Shared Savings Program ACOs for Performance Year 2025”, third row (Quality #001), second column (Measure Title), the entry “Diabetes: Hemoglobin A1c (HbA1c) Poor Control (>9%)” is corrected to read “Diabetes: Glycemic Status Assessment Greater Than 9%”.

“TABLE 51: CY 2025 Part B Payments for

Preventive Vaccine Administration if the EUA Declaration for Drugs and Biologicals with Respect to COVID-19 Continues into CY 2025,” fifth and sixth rows, the entries are corrected to read as follows:

Category of Part B Product Administration	Part B Payment Amount (Unadjusted)	Amount Update	Geographic Adjustment
COVID-19 Monoclonal Antibodies (for Pre-Exposure Prophylaxis)			
Intravenous Infusion: Health Care Setting	\$450	N/A	GAF

“Table 59” is corrected to read “Table 58”.

“Table 60” is corrected to read “Table 59”.

“Table 60” is corrected to read “Table 61”.

“Table 61” is corrected to read “Table 62”.

“TABLES 67, 68, 69, 70 71: Alignment of the APP Plus Measure Set with the Adult Universal Foundation Measure Set”, the entry “Diabetes: Hemoglobin A1c (HbA1c) Poor Control” is corrected to read “Diabetes: Glycemic Status Assessment Greater Than 9%”.

On pages 98406 through 98408, in the table titled “Table 75: Summary Table of Previously Established and Finalized Cost Measures for the CY 2025 Performance Period/2027 MIPS Payment Year and Future Performance Periods”, last row (Total Per Capita Cost), third column (Case Minima), the entry “20 beneficiary months” is corrected to read “20 beneficiaries”.

On page 98508, first column,

- a. Line 11, the phrase “80 percent” is corrected to “82 percent”.
- b. Line 13, the phrase “75 percent” is corrected to “76 percent”.

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- c. Line 31, the phrase "1 percent" is corrected to read "0 percent".
  - d. Line 34, the phrase "24 percent" is corrected to read "23 percent".
  - e. Line 39, the phrase "13 percent" is corrected to read "14 percent".
  - f. Lines 43 and 44, the phrase "14 percent" is corrected to read "15 percent".

### **Final Comments**

The only way to insure a total understanding of all the corrections is to review the rule itself. From pages 3-8 CMS says 52 times that in "inadvertently made a typographical error."