

Estimated Sustainable Growth Rate and Conversion Factor, for Medicare Payments to Physicians in 2011

Section 1848(d)(1)(E) of the Social Security Act (the Act) requires the Secretary to make available to the Medicare Payment Advisory Commission (MedPAC) and the public, by March 1, an estimate of the Sustainable Growth Rate (SGR) and conversion factor applicable to Medicare payments for physicians' services for the following year and the data underlying these estimates. We are providing the estimates and information applicable to physician fee schedule payments in calendar year 2011. It is important to note that the SGR and conversion factor shown here are *estimated* – the actual values used to compute physician payments for 2011 will be based on later data and are scheduled to be published by November 1, 2010 in the *Federal Register* as part of the physician fee schedule final rule for 2011. In addition, the information shown here includes legislative changes through March 5, 2010, but does not include any effects from the subsequent healthcare reform legislation.

Medicare Sustainable Growth Rate

Section 1848(f) of the Act, as amended by section 4503 of the Balanced Budget Act of 1997 (BBA) (Pub. L. 105-33), enacted on August 5, 1997, replaced the Medicare Volume Performance Standard (MVPS) with a Sustainable Growth Rate (SGR) provision. Section 1848(f)(2) of the Act specifies the formula for establishing yearly SGR targets for physicians' services under Medicare. The use of SGR targets is intended to control the growth in aggregate Medicare expenditures for physicians' services.

The SGR targets are not direct limits on expenditures. Payments for services are not withheld if the SGR target is exceeded by actual expenditures. Rather, the fee schedule update, as specified in section 1848(d)(4) of the Act, is adjusted to reflect the comparison of actual expenditures to target expenditures. If expenditures exceed the target, the update is reduced. If expenditures are less than the target, the update is increased. Under the statute, the update for a year is determined by comparing cumulative actual expenditures to cumulative target expenditures (referred to as "allowed expenditures" in the statute) from April 1, 1996 through the end of the year preceding the year at issue. For instance, the 2011 update will reflect a comparison of cumulative actual to cumulative target expenditures from April 1, 1996 through December 31, 2010. Target expenditures for each year are equal to target expenditures from the previous year increased by the SGR (which is a percentage figure computed by combining four factors specified below).

The statute specifies a formula to calculate the SGR based on our estimate of the change in each of four factors. The four factors for calculating the SGR are as follows:

- (1) The estimated percentage change in fees for physicians' services.
- (2) The estimated percentage change in the average number of Medicare fee-for-service beneficiaries.
- (3) The estimated 10-year average annual percentage change in real gross domestic product (GDP) per capita.
- (4) The estimated percentage change in expenditures due to changes in law or regulations.

Prior to enactment of the Medicare Prescription Drug, Improvement and Modernization Act (also known as the Medicare Modernization Act, or MMA), the statute required the SGR to be calculated using estimated projected growth in real GDP per capita. That is, the Secretary was required to use an estimate of a single year's real GDP per capita to determine the SGR. However, section 1848(f)(2)(c) of the Act, as amended by section 601(b) of the MMA, requires the Secretary to calculate the SGR using the 10-year annual average growth in real gross domestic product per capita.

Section 1848(d)(1)(E) of the Act requires publication in the *Federal Register* no later than November 1 of each year (beginning with 2000) of the actual conversion factor, update and allowed expenditures that will apply to physicians' services for the succeeding year. Another section of the law (section 1848(f)(1)) requires that we publish in the *Federal Register* no later than November 1 of each year, using the best available data as of September 1, the SGR for the following year, the contemporaneous year, and the preceding year. By November 1, 2010, we are required to publish, based on the best data available to us as of September 1, 2010, the SGRs for CY 2009, CY 2010, and CY 2011. We plan to comply with these requirements as part of the physician fee schedule final rule for 2011. Thus, in this document, we are providing (i) our current estimates (as of March 1, 2010) of the SGRs for CY 2009, CY 2010, and CY 2011, (ii) our current estimate of allowed expenditures under the SGR system through the end of

2011, and (iii) our current estimate of the physician fee schedule update and conversion factor for 2011. We will be providing updates of all this information using more recent data in the physician fee schedule final rule for 2011. The updated values scheduled to be published in the final rule by November 1, 2010 will be used to determine the actual update for physician payments in CY 2011.

Table 1 shows our current estimates of the aforementioned SGRs.

Table 1. Current Estimates of SGRs for CY 2009, CY 2010, and CY 2011

	CY 2009	CY 2010	CY 2011
Factor 1: Increase in Fees	1.8%	0.9%	0.2%
Factor 2: Increase in Enrollment	-0.9%	1.7%	3.1%
Factor 3: Increase in 10-year moving average Real Per Capita GDP	1.1%	0.8%	0.8%
Factor 4: Increase due to changes in Law or Regulations	4.1%	-7.5%	-4.4%
Total Sustainable Growth Rate	6.2%	-4.3%	-0.4%

Our March 1 estimates of the SGRs provided in Table 1 are early estimates only and may change based on later information. The later figures will be included in the physician fee schedule final rule that is scheduled to be published in the *Federal Register* by November 1. While the current figures are our best estimates at this time, the figures we specify later in the year are likely to differ from our current estimates for several reasons, particularly with respect to the SGR estimates for the following year.

When we publish the physician fee schedule final rule, we will have more complete data on the four factors that comprise the SGR formula (as of September 1 of a year) than are available by March 1. For example, for the 2011 SGR estimate made as of March 2010, we must estimate the percent change in fee-for-service enrollment for 2011 although we have little information on the change in fee-for-service enrollment for 2010. Similarly, an estimate of the percent change in real GDP per capita for 2010 made by November 1, 2010 is likely to be better than an estimate made by March 1, 2010. Estimates of real per capita GDP for 2011 will remain forecasted and based on no actual information measuring economic performance from 2011, both now and in November. However, since we are using a 10-year moving average of real per capita GDP in place of a single year figure, we expect this factor to vary less than it would have if the MMA had not been enacted. In addition, an estimate of the changes in law and regulation affecting expenditures for physicians' services for 2011 requires an estimate of the financial impact of any policy changes several months before the physician fee schedule proposed rule is published. For these reasons, readers should carefully consider the inherent limitations of these estimates and be aware that the subsequent values scheduled to be announced in November will likely be at least somewhat different.

We also point out that there may be differences between an SGR for a year specified in the physician fee schedule final rule and the SGR for the same year as subsequently revised based on later data. Section 1848(f)(3) of the statute, as amended by section 211 of the Balanced Budget Refinement Act of 1999 (BBRA), requires the adjustment of prior years' SGR component factors, to reflect later data, beginning with the SGR for FY 2000. The two SGR elements that have exhibited the most volatility have been the fee-for-service enrollment numbers and real gross domestic product per capita.¹

Table 2 shows the historical values of the SGR as well as its predecessor, the Medicare Volume Performance Standard (MVPS). The MVPS applied for FY 1990 through FY 1997. Figures reflect a weighted average MVPS for FY 1991 through FY 1993 when there were two different MVPSs (one for surgical services, and one for all other services) and for FY 1994 through FY 1997 when there were three different MVPSs (for surgical services, primary care services, and all other services).

¹ We note that more recent data on these two elements are available during a year on several web sites. The latest measurements of real GDP for a quarter are available from the home page for the Bureau of Economic Analysis of the Department of Commerce (www.bea.gov). Population figures are available from the home page for the Census Bureau (www.census.gov). Real GDP per capita can be calculated from these figures. In April of each year, when our Office of the Actuary puts the Trustees Report on the CMS Home page, we will also post the projections of total Medicare Part B enrollment and of Medicare managed care enrollment for the current and subsequent calendar years, as well as for the preceding calendar year, consistent with the Trustees Report. Thus, Medicare fee-for-service enrollment could be determined from these figures.

Table 2 Physician MVPS / SGR

Year	Physician MVPS / SGR
FY 1990	9.1%
FY 1991	7.3%
FY 1992	10.0%
FY 1993	10.0%
FY 1994	9.4%
FY 1995	7.5%
FY 1996	1.8%
FY 1997	-0.3%
FY 1998	3.2%
FY 1999	4.2%
FY 2000	6.9%
CY 2000	7.3%
CY 2001	4.5%
CY 2002	8.3%
CY 2003	7.3%
CY 2004	6.6%
CY 2005	4.2%
CY 2006	1.5%
CY 2007	3.5%
CY 2008	4.5%

Allowed Expenditures for Physicians' Services

Section 1848(d)(3)(C) of the Act defines allowed expenditures for the period April 1, 1996 through March 31, 1997 to be equal to actual expenditures for physicians' services during that period as estimated by the Secretary. Annual allowed expenditures for subsequent periods are equal to annual allowed expenditures for the previous year increased by the SGR. The BBRA provided for a transition from a fiscal year to a calendar year SGR system. Beginning with CY 2000, the SGR is determined on a calendar year basis. We have described this transition in a notice that appeared in the *Federal Register* on April 10, 2000.

Table 3 shows quarterly allowed expenditures and cumulative allowed expenditures for the period from April 1, 1996 through December 31, 2011. (The table shows quarterly allowed expenditures for physicians' services in order to reflect any seasonality, which may occur in expenditures for physicians' services over a year.) We provide more information below on how quarterly figures are combined to determine allowed expenditures for a year.

In the physician fee schedule final rule with comment period issued October 30, 2009, the scope of physicians' services, as specified by the Secretary, was changed to exclude physician-administered drugs from the calculation of allowed and actual expenditures for all years and the SGR beginning in 2010. Accordingly, the summary of allowed expenditures for physicians' services and the SGR for 2010 and 2011 in Table 3 reflects this change.

Table 3. Summary of Allowed Expenditures for Physicians' Services¹

Quarter	Applicable SGR	Quarterly Allowed Expenditures ² [in billions]	Cumulative Allowed Expenditures ³ [in billions]
2Q1996		\$11.9	\$11.9
3Q1996		\$11.5	\$23.4
4Q1996		\$11.7	\$35.0
1Q1997		\$11.8	\$46.8
2Q1997	3.2%	\$12.3	\$59.1
3Q1997	3.2%	\$11.9	\$71.0
4Q1997	3.2%	\$12.0	\$83.0
1Q1998	3.2%	\$12.2	\$95.2
2Q1998	4.2%	\$12.8	\$108.0
3Q1998	4.2%	\$12.4	\$120.3
4Q1998	4.2%	\$12.6	\$132.9
1Q1999	4.2%	\$12.7	\$145.6

Quarter	Applicable SGR	Quarterly Allowed Expenditures ² [in billions]	Cumulative Allowed Expenditures ³ [in billions]
2Q1999	6.9%	\$13.7	\$159.2
3Q1999	6.9%	\$13.2	\$172.4
4Q1999	6.9%	\$13.4	\$185.8
1Q2000	7.3%	\$13.6	\$199.5
2Q2000	7.3%	\$14.7	\$214.1
3Q2000	7.3%	\$14.2	\$228.3
4Q2000	7.3%	\$14.4	\$242.7
1Q2001	4.5%	\$14.2	\$256.9
2Q2001	4.5%	\$15.3	\$272.2
3Q2001	4.5%	\$14.8	\$287.0
4Q2001	4.5%	\$15.0	\$302.1
1Q2002	8.3%	\$15.4	\$317.5
2Q2002	8.3%	\$16.6	\$334.1
3Q2002	8.3%	\$16.0	\$350.1
4Q2002	8.3%	\$16.3	\$366.4
1Q2003	7.3%	\$16.5	\$382.9
2Q2003	7.3%	\$17.8	\$400.7
3Q2003	7.3%	\$17.2	\$417.9
4Q2003	7.3%	\$17.5	\$435.4
1Q2004	6.6%	\$17.6	\$453.0
2Q2004	6.6%	\$19.0	\$472.0
3Q2004	6.6%	\$18.3	\$490.4
4Q2004	6.6%	\$18.6	\$509.0
1Q2005	4.2%	\$18.4	\$527.4
2Q2005	4.2%	\$19.8	\$547.1
3Q2005	4.2%	\$19.1	\$566.3
4Q2005	4.2%	\$19.4	\$585.7
1Q2006	1.5%	\$18.6	\$604.3
2Q2006	1.5%	\$20.1	\$624.4
3Q2006	1.5%	\$19.4	\$643.8
4Q2006	1.5%	\$19.7	\$663.5
1Q2007	3.5%	\$19.3	\$682.8
2Q2007	3.5%	\$20.8	\$703.6
3Q2007	3.5%	\$20.1	\$723.6
4Q2007	3.5%	\$20.4	\$744.0
1Q2008	4.5%	\$20.2	\$764.2
2Q2008	4.5%	\$21.7	\$785.9
3Q2008	4.5%	\$21.0	\$806.9
4Q2008	4.5%	\$21.3	\$828.2
1Q2009	6.2%	\$21.4	\$849.6
2Q2009	6.2%	\$23.1	\$872.7
3Q2009	6.2%	\$22.3	\$894.9
4Q2009	6.2%	\$22.6	\$917.6
1Q2010	-4.3%	\$20.5	\$938.1
2Q2010	-4.3%	\$22.1	\$960.1
3Q2010	-4.3%	\$21.3	\$981.5
4Q2010	-4.3%	\$21.7	\$1,003.1
1Q2011	-0.4%	\$20.4	\$1,023.5
2Q2011	-0.4%	\$22.0	\$1,045.5
3Q2011	-0.4%	\$21.2	\$1,066.7
4Q2011	-0.4%	\$21.6	\$1,088.3

¹As explained above, pursuant to the BBRA, the SGRs for FY2000, CY 2000, and all subsequent years are estimated and subsequently revised twice, based on later data. The 2009 figures (based on the CY 2009 SGR), the 2010 figures (based on the 2010 SGR), and the 2011 figures (based on the 2011 SGR) are estimated and may change based on more recent information which affects these SGRs.

²Allowed expenditures for a quarter (such as 4Q2011) are equal to allowed expenditures for the same quarter in the previous year (4Q2010 in this example) increased by the SGR for the year in which that quarter occurs (in this case, -0.4 percent). For example, quarterly allowed expenditures of \$21.6 billion in 4Q2011 are equal to quarterly allowed expenditures of roughly \$21.7 billion (4Q2010) updated by the SGR of -0.4 percent (\$21.6 billion = \$21.7 billion x 0.996).

³Cumulative allowed expenditures for a quarter (such as 4Q 2011) are equal to the sum of cumulative allowed expenditures from the previous quarter for the same year (3Q2011) and quarterly allowed expenditures for that quarter. For example, cumulative allowed expenditures in 4Q2011 of \$1,088.3 billion are equal to the sum of cumulative allowed expenditures through 3Q2011 of \$1,066.7 billion and estimated allowed expenditures in 4Q2011 of \$21.6 billion (\$1,088.3 billion = \$1,066.7 billion + \$21.6 billion).

Note: Totals do not necessarily equal the sum of rounded components.

Actual Expenditures for Physicians' Services

Table 4 shows, on a quarterly basis from April 1, 1996 through December 31, 2009, actual expenditures and cumulative actual expenditures for the period. These expenditures represent allowed charges tabulated by the quarter in which the service was furnished. Since there is a lag between the date that the service is furnished and the date that the payment is made, the most recent quarters depict incomplete data. The total allowed charges for these quarters are estimated by approximating the level of completeness of the data. This approximation is determined using historical trends. We will update these amounts periodically when we have reasonably complete data (approximately 6 months after the end of a quarter). As we have described above, we are showing actual expenditures on a quarterly basis to reflect any seasonal variation in expenditures that occurs over the year.

In the physician fee schedule final rule with comment period issued October 30, 2009, the scope of physicians' services, as specified by the Secretary, was changed to exclude physician-administered drugs from the calculation of allowed and actual expenditures for all years and the SGR beginning in 2010. Accordingly, the summary of actual expenditures for physicians' services in Table 4 reflects this change.

Table 4. Summary of Actual Expenditures under the SGR

Calendar Quarter	Benefits Processed thru 12/31/09 [in billions]	Approximate Completeness	Estimated Total Expenditures ¹ [in billions]	Cumulative Total Expenditures ¹ [in billions]
2Q1996	\$11.8	100.0%	\$11.8	\$11.8
3Q1996	\$11.5	100.0%	\$11.5	\$22.4
4Q1996	\$11.7	100.0%	\$11.7	\$35.0
1Q1997	\$11.8	100.0%	\$11.8	\$46.8
2Q1997	\$12.0	100.0%	\$12.0	\$58.8
3Q1997	\$11.6	100.0%	\$11.6	\$70.4
4Q1997	\$11.5	100.0%	\$11.5	\$81.9
1Q1998	\$12.0	100.0%	\$12.0	\$93.9
2Q1998	\$12.0	100.0%	\$12.0	\$105.9
3Q1998	\$11.7	100.0%	\$11.7	\$117.5
4Q1998	\$11.8	100.0%	\$11.8	\$129.3
1Q1999	\$12.4	100.0%	\$12.4	\$141.7
2Q1999	\$12.5	100.0%	\$12.5	\$154.2
3Q1999	\$12.2	100.0%	\$12.2	\$166.4
4Q1999	\$12.3	100.0%	\$12.3	\$178.8
1Q2000	\$13.6	100.0%	\$13.6	\$192.4
2Q2000	\$13.6	100.0%	\$13.6	\$206.0
3Q2000	\$13.4	100.0%	\$13.4	\$219.4
4Q2000	\$13.5	100.0%	\$13.5	\$232.9
1Q2001	\$15.1	100.0%	\$15.1	\$248.0
2Q2001	\$15.5	100.0%	\$15.5	\$263.5
3Q2001	\$15.1	100.0%	\$15.1	\$278.6
4Q2001	\$15.5	100.0%	\$15.5	\$294.2
1Q2002	\$15.8	100.0%	\$15.8	\$309.9
2Q2002	\$16.3	100.0%	\$16.3	\$326.3
3Q2002	\$16.2	100.0%	\$16.2	\$342.4
4Q2002	\$16.3	100.0%	\$16.3	\$358.7
1Q2003	\$16.9	100.0%	\$16.9	\$375.6
2Q2003	\$17.8	100.0%	\$17.8	\$393.4
3Q2003	\$17.8	100.0%	\$17.8	\$411.2
4Q2003	\$17.8	100.0%	\$17.8	\$429.0
1Q2004	\$19.3	100.0%	\$19.3	\$448.3
2Q2004	\$19.7	100.0%	\$19.7	\$468.0
3Q2004	\$19.6	100.0%	\$19.6	\$487.6
4Q2004	\$19.6	100.0%	\$19.6	\$507.2
1Q2005	\$20.7	100.0%	\$20.7	\$527.9
2Q2005	\$21.4	100.0%	\$21.4	\$549.3
3Q2005	\$20.9	100.0%	\$20.9	\$570.2

Calendar Quarter	Benefits Processed thru 12/31/09 [in billions]	Approximate Completeness	Estimated Total Expenditures ¹ [in billions]	Cumulative Total Expenditures ¹ [in billions]
4Q2005	\$20.5	100.0%	\$20.5	\$590.7
1Q2006	\$21.3	100.0%	\$21.3	\$612.0
2Q2006	\$21.3	100.0%	\$21.3	\$633.3
3Q2006	\$20.9	100.0%	\$20.9	\$654.1
4Q2006	\$21.1	100.0%	\$21.1	\$675.3
1Q2007	\$21.2	100.0%	\$21.2	\$696.5
2Q2007	\$21.4	100.0%	\$21.4	\$717.9
3Q2007	\$20.9	100.0%	\$20.9	\$738.8
4Q2007	\$21.0	100.0%	\$21.0	\$759.8
1Q2008	\$21.7	100.0%	\$21.7	\$781.4
2Q2008	\$21.9	99.9%	\$21.9	\$803.3
3Q2008	\$21.5	99.8%	\$21.6	\$824.9
4Q2008	\$21.4	99.6%	\$21.5	\$846.4
1Q2009	\$22.3	99.1%	\$22.5	\$868.8
2Q2009	\$22.7	98.2%	\$23.1	\$891.9
3Q2009	\$21.9	95.7%	\$22.9	\$914.9
4Q2009	\$16.2	72.9%	\$22.3	\$937.2

¹Estimated and cumulative total expenditures are less likely to change as the approximate completeness approaches 100 percent.

Note: Totals do not necessarily equal the sum of rounded components.

CY 2011 Physician Fee Schedule Update and Conversion Factor

The CY 2011 physician fee schedule update is determined according to a statutory formula by multiplying (i) one plus the Medicare Economic Index (MEI), and (ii) one plus the update adjustment factor (UAF). The MEI measures the weighted average price change for various inputs involved with producing physicians' services. The UAF compares actual and target expenditures, and, for a given year, is determined by a formula, as shown below.

$$UAF_{2011} = \frac{\text{Target}_{2010} - \text{Actual}_{2010}}{\text{Actual}_{2010}} \times 0.75 + \frac{\text{Target}_{4/96-12/10} - \text{Actual}_{4/96-12/10}}{\text{Actual}_{2010} \times (1 + SGR_{2011})} \times 0.33$$

Substituting the estimated figures from tables 1, 3, and 4, as well as our current projections of actual expenditures for CY 2010 (summarized below) in this formula produces our current estimate of the UAF for 2011:

Target₁₀ = Estimated Allowed Expenditures for CY 2010 = \$85.5 billion (\$20.5 + \$22.1 + \$21.3 + \$21.7)

Actual₁₀ = Estimated Actual Expenditures for CY 2010 = \$84.4 billion

Target_{4/96-12/10} = Estimated Cumulative Allowed Expenditures from 4/1/96 - 12/31/10 = \$1,003.1 billion

Actual_{4/96-12/10} = Estimated Cumulative Actual Expenditures from 4/1/96 - 12/31/10 = \$1,021.6 billion

SGR₂₀₁₁ = Estimated Sustainable Growth Rate for 2011 = -0.4 percent or -0.004

$$UAF_{2010} = \frac{85.5 - 84.4}{84.4} \times 0.75 + \frac{1,003.1 - 1,021.6}{84.4 \times 0.996} \times 0.33 = -0.062 = -6.2\%$$

Section 1848(d)(3)(D) of the Act does not allow the update adjustment factor for a given year to be greater than 3.0 percentage points nor less than -7.0 percentage points. The UAF for 2011 is estimated to be -6.2 percentage points, which is within the allowed range.

As shown in table 5, the estimated CY 2011 conversion factor is determined by applying the 2011 MEI and the 2011 UAF to the conversion factor in effect at the conclusion of 2010. The estimated CY 2011 conversion factor update is -6.1 percent.

Table 5. CY 2010 Physician Fee Schedule Conversion Factor

CY 2010 Conversion Factor	\$28.3910
CY 2011 MEI	0.1% (1.00100)
CY 2011 Update Adjustment Factor	-6.2% (0.93800)
CY 2011 Conversion Factor Update	-6.1% (0.93894)
CY 2011 Conversion Factor	\$26.6574

Table 6 lists the historical MEI and physician updates from 1992 through 2010 and the estimated values for 2011. The physician update reflects a weighted average for 1993 when there were two different updates (one for surgery and one for other services), and for 1994 through 1998 when there were three different updates (for surgery, primary care, and other services).

Table 6. Actual Past Medicare Economic Index Increases and Physician Updates for 1992-2009, and Estimated Values for 2010

Year	Physician Medicare Economic Index Increase	Physician Update
Actual:		
1992	3.2%	1.9%
1993	2.7%	1.4%
1994	2.3%	7.0%
1995	2.1%	7.5%
1996	2.0%	0.8%
1997	2.0%	0.6%
1998	2.2%	2.3%
1999	2.3%	2.3%
2000	2.4%	5.5%
2001	2.1%	5.0%
2002	2.6%	-4.8%
2003	3.0%	1.7%
2004	2.9%	1.5%
2005	3.1%	1.5%
2006	2.8%	0.2%
2007	2.1%	0.0%
2008	1.8%	0.5%
2009	1.6%	1.1%
2010	1.2%	-16.0%
2011	0.1%	-11.2%
<u>Average Annual</u>		
1992-2011	2.2%	0.3%
1998-2011	2.2%	-0.9%
<u>Cumulative</u>		
1992-2011	55.2%	5.5%

Notes: The update of 1.7% for 2003 was effective on March 1, 2003; therefore the average update for that year was 1.4%. For 2006, the Deficit Reduction Act froze the physician fee schedule conversion factor. The conversion factor freeze, together with refinements to the relative value units, resulted in an update of 0.2 percent for 2006. For 2010, the Department of Defense Appropriations Act provided a 0-percent update for January and February, and the Temporary Extension Act provided a 0-percent update for March. A -21.3 percent update starts in April 2010. Therefore, the physician updates for 2010 and 2011 are determined using a weighted average of the two update periods.

Questions on the information presented here may be addressed to:

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