

PRESENTATION TO THE ADVISORY PANEL ON HOSPITAL OUTPATIENT PAYMENT

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August 24, 2026

ASSIGN THE APPLICATION OF NON-SHEET CTPs TO APPROPRIATE APC GROUP OR PROVIDE INSTRUCTIONS FOR PAYMENT

THE ISSUE

- CMS determined that non-sheet CTPs - gel, powder, ointment, foam, liquid, or injectable - are covered and reimbursable.
- CMS indicated that CTP sheet products would be reimbursed at the same rate - \$127.14 in an ASC as in the HOPD.
- Because non-sheet products don't align with AMA application of CTP coding directions- they cannot use the sheet application codes (15271-15278), CMS created four new HCPCS G-codes for non-sheet products: G0681-G0684.
- However, none of these codes were assigned to an APC group, leaving the payment rate for non-sheet CTP application unclear.
- CMS has already committed to paying sheet form CTPs at the same \$127.14 rate whether furnished in an ASC or an HOPD. This signals a clear intent that site of service should not change how a clinically equivalent product is valued. Similarly, this should also apply to the application of the product which would allow for consistency across the sites of service.

RECOMMENDATION

The Alliance requests that the Panel recommend to CMS to assign non-sheet CTP application to an APC group consistent with the sheet - product codes: Map **G0681 to APC 5053** and **G0683 to APC 5054**.

TOTAL CONTACT CAST (TCC)

THE ISSUE

- CPT guidance allows debridement codes (11042-11047, 97597-97598) and TCC application (CPT 29445) on the same date of service.
- These codes should map to APC 5052-5053/5102
- The CPT Assistant Guidance states "Code 29445, *Application of rigid total contact leg cast*" is the appropriate code to report for the total contact cast application. A TCC is used to reduce the pressure and/or shear forces on a lower extremity wound, typically on the plantar surface. The cast improves the ability of the wound to heal.
- If a wound debridement is performed (codes 11042-11047, 97597-97598), any primary or secondary dressing materials used to cover the wound would be included in the debridement and would not be separately reported.
- However, a TCC is not considered a wound dressing and is not included in the debridement procedure. Therefore, the cast application should be coded in addition to the code for the appropriate level of debridement, if performed, and should appropriately be mapped to APC 5102.

RECOMMENDATION

The Alliance requests that the Panel recommends to CMS to pay HOPDs the separate APC for the TCC **APC 5102** when a debridement is performed on the same date of service, consistent with AMA/CPT coding guidance.