

Ahn, Hannah (CMS/CM)

From: Jerry Stringham <jstringham@medicaltechpartners.com>
Sent: Tuesday, February 10, 2026 10:30 AM
To: CMS MedicarePhysicianFeeSchedule
Cc: Yoder, Emily (CMS/CM)
Subject: Potentially Misvalued Codes - 51715 Endoscopic injection of implant material into the submucosal tissues of the urethra and/or bladder neck
Attachments: Bulkamid Invoices.pdf

Dear CMS:

Per your instructions, we are submitting this Potentially Misvalued Code nomination.

This request is to update the non-facility practice expense supply inputs associated with CPT code 51715, *Endoscopic injection of implant material into the submucosal tissues of the urethra and/or bladder neck*.

As of the 2026 PFS Final Rule Direct PE Inputs, the following non-facility supplies are included for 51715. We note that the inputs do not include a supply for the implant material necessary to properly perform 51715 in the office setting, which is a clinically desired place of service for this treatment.

Source	Category	CMS Code	Description	Unit	Price	NF Qty
CMS	Kit, Pack, Tray	SA042	pack, cleaning and disinfecting, endoscope	pack	25.36	1
CMS	Kit, Pack, Tray	SA048	pack, minimum multi-specialty visit	pack	4.01	1
CMS	Kit, Pack, Tray	SA058	pack, urology cystoscopy visit	pack	75.67	1
CMS	Hypodermic, IV	SC028	needle, 18-26g 1.5-3.5in, spinal	item	9.96	1
CMS	Accessory, Procedure	SD024	catheter, Foley	item	10.85	1
CMS	Pharmacy, Rx	SH074	water, sterile for irrigation (250-1000ml uou)	item	2.85	1

Per the code description, 51715 requires injection of implant material. You will note in the attached invoices that the Bulkamid bulking agent used in this procedure is sold in 2mL vials, which is typical use for the procedure.

To further assess whether 2mL is the typical bulking agent quantity for the procedure, we performed an analysis of the 5% sample file of Medicare physician claims scaled to 100% and limited to the physician office. The analysis demonstrates a history of 2mL of L8606 (*Injectable bulking agent, synthetic implant, urinary tract, 1 ml syringe, includes shipping and necessary supplies*) being reported with 51715:

CY	Mean Allowed Units of L8606 When Billed with 51715
2016	2.4
2017	2.1

2018	1.9
2019	2.2
2020	2.1
2021	1.8
2022	1.9
2023	1.8
2024	2.0

No other code for a bulking agent was present in the 5% file sample data run. The 2mL quantity is also consistent with Bulkamid product labeling.

Attached to this email is a PDF file containing 18 paid invoices from 2025, covering 13 customer sites. Please treat these invoices as confidential. As you can see from the summary below, the price per 2mL of bulking material ranges from \$1,050 to \$1,300. The difference in pricing is due to negotiations based on volume commitments and other factors. The average (mean) of these invoices is \$1,175.

	Invoice #	Date	Customer	Price per 2mL
1.	706476921	5/5/25	Customer 1	\$1,075.00
2.	706477563	5/5/25	Customer 2	\$1,050.00
3.	706483954	5/5/25	Customer 2	\$1,050.00
4.	706483936	5/5/25	Customer 3	\$1,150.00
5.	706541551	5/7/25	Customer 4	\$1,050.00
6.	706596599	5/9/25	Customer 5	\$1,150.00
7.	706843112	5/21/25	Customer 6	\$1,075.00
8.	707047606	5/30/25	Customer 7	\$1,300.00
9.	707185105	6/6/25	Customer 7	\$1,300.00
10.	707253105	6/10/25	Customer 8	\$1,150.00
11.	707269456	6/11/25	Customer 9	\$1,300.00
12.	707623333	6/25/25	Customer 10	\$1,150.00
13.	708137212	7/21/25	Customer 10	\$1,150.00
14.	708807661	8/26/25	Customer 10	\$1,150.00
15.	709005618	9/8/25	Customer 11	\$1,300.00
16.	709006339	9/8/25	Customer 11	\$1,300.00
17.	709420421	10/1/25	Customer 12	\$1,150.00
18.	710258819	11/20/25	Customer 13	\$1,300.00

We request that CMS create a CMS Code for URETHRAL BULKING MATERIAL 2ML with a non-facility quantity of 1, associate this new CMS Code with CPT code 51715, and establish the price at \$1,175 to appropriately value 51715 in the physician office place of service.

Thank you for your consideration. If you have any questions or require additional information, please contact me at 240-453-0550 X200 or my cell phone which is 240-601-4334.

Sincerely,

Jerry

Jerry Stringham

President

Medical Technology Partners

240-453-0550 x200 | 240-601-4334 (cell)

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