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Discussion of Proton Therapy Reimbursement

HOP Panel Advisory Meeting

March 11 – 12, 2013

Presentation Check List

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Financial Relationship: Presenters

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- *Dr. Andrew Chang*
Radiation Oncologist
Proton Center Development Corporation
 - Hampton University Proton Therapy Institute
 - ProCure Proton Therapy CenterScripps Proton Therapy Center
- *Dr. Minesh Mehta*
Medical Director, Maryland Proton Treatment Center
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Proton Therapy Reimbursement Rates

CY 2013

- Proton Therapy is reimbursed under the following CPT codes:
 - **77520**: Proton treatment delivery; simple, without compensation
 - **77522**: Proton treatment delivery; simple, with compensation
 - **77523**: Proton treatment delivery; intermediate
 - **77525**: Proton treatment delivery; complex
- APCs affected:
 - **0664**
 - **0667**

Clinical Description: Proton Therapy

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- Proton beam therapy is a specialized form of external radiation treatment. It allows a more focused dose of radiation to be delivered to the target area while minimizing or eliminating radiation to surrounding healthy tissue.
- Treatments are classified as simple, intermediate or complex.

Clinical Description:

Simple and Complex Cases: A Comparison

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Simple: Single treatment area; single non-tangential or no-oblique port; without compensation

Intermediate: One or more treatment areas; two or more ports or one or more tangential or oblique ports; custom blocks and compensators

Complex: One or more treatment areas; two or more ports per treatment area with matching or patching fields or multiple isocenters; custom blocks and compensators

	2013 Rate	Treatment Time
Simple	\$1169	Baseline
Intermediate	\$702	On average 90% longer than simple
Complex	\$702	On average 132% longer than simple

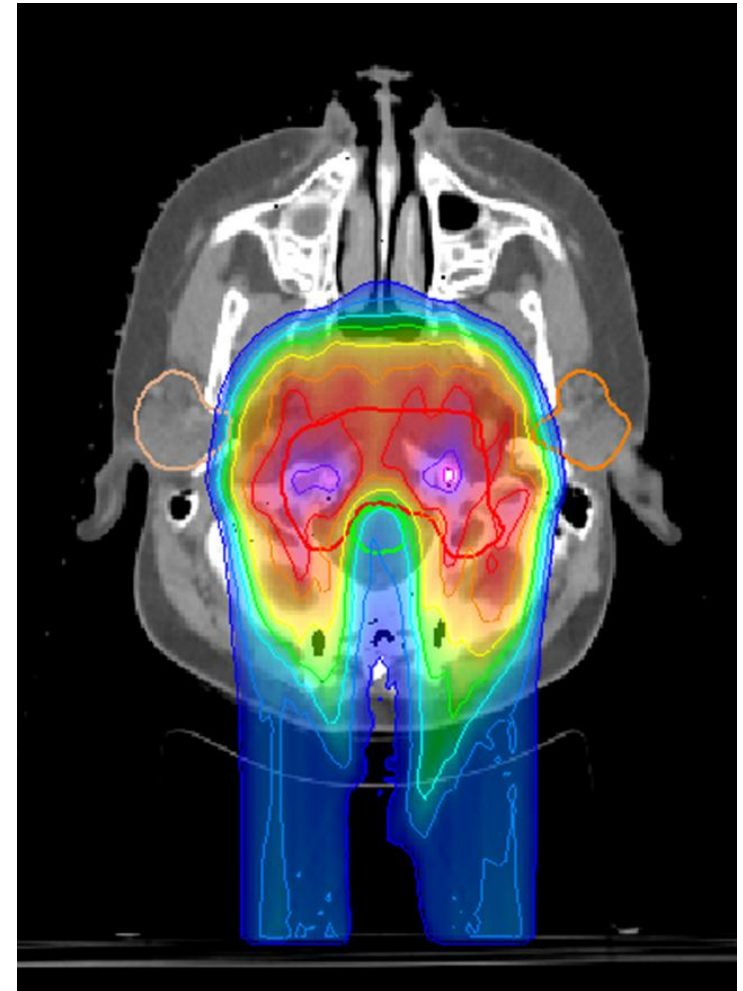
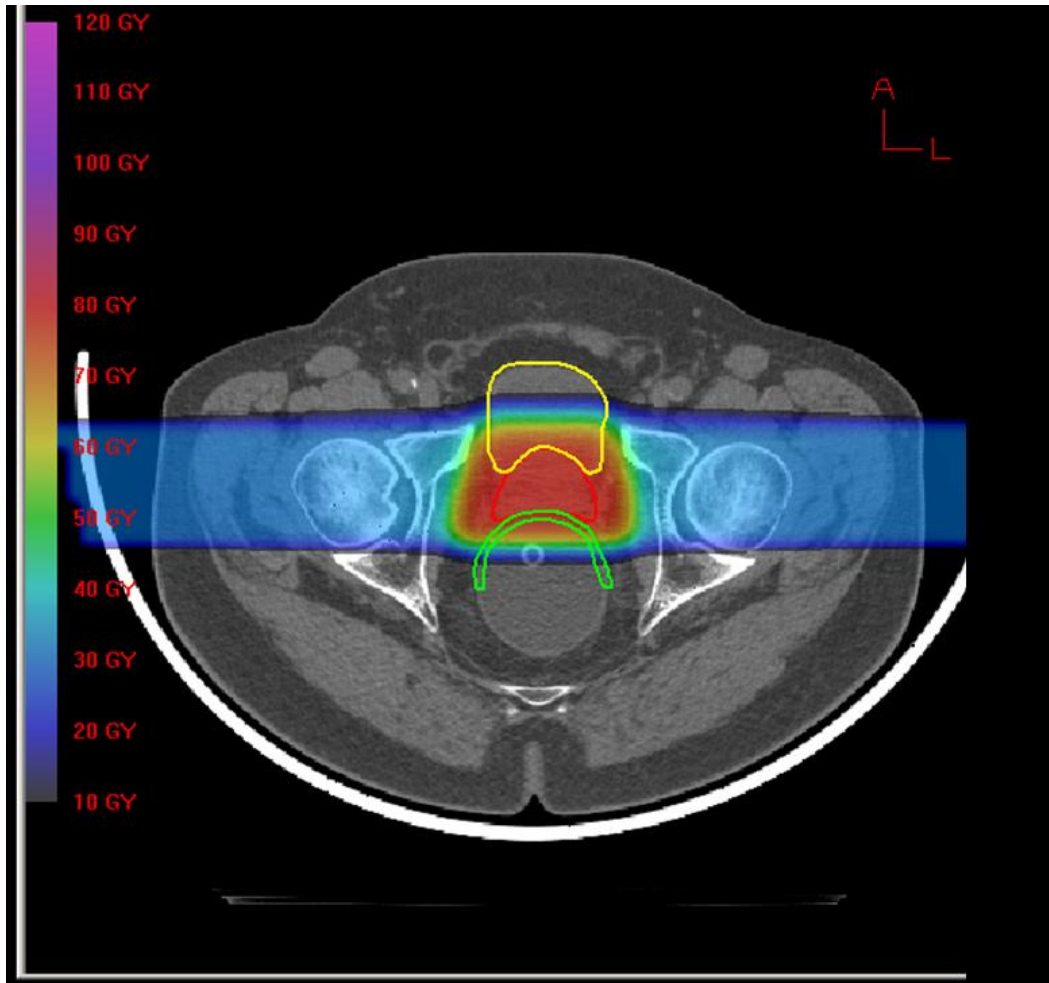
Note: The above table provides an illustrative example and reflects actual times calculated from all patients treated in 2011 and 2012 from a proton therapy center.

Proton Therapy Plans

Simple (2 fields)

Complex (9 fields)

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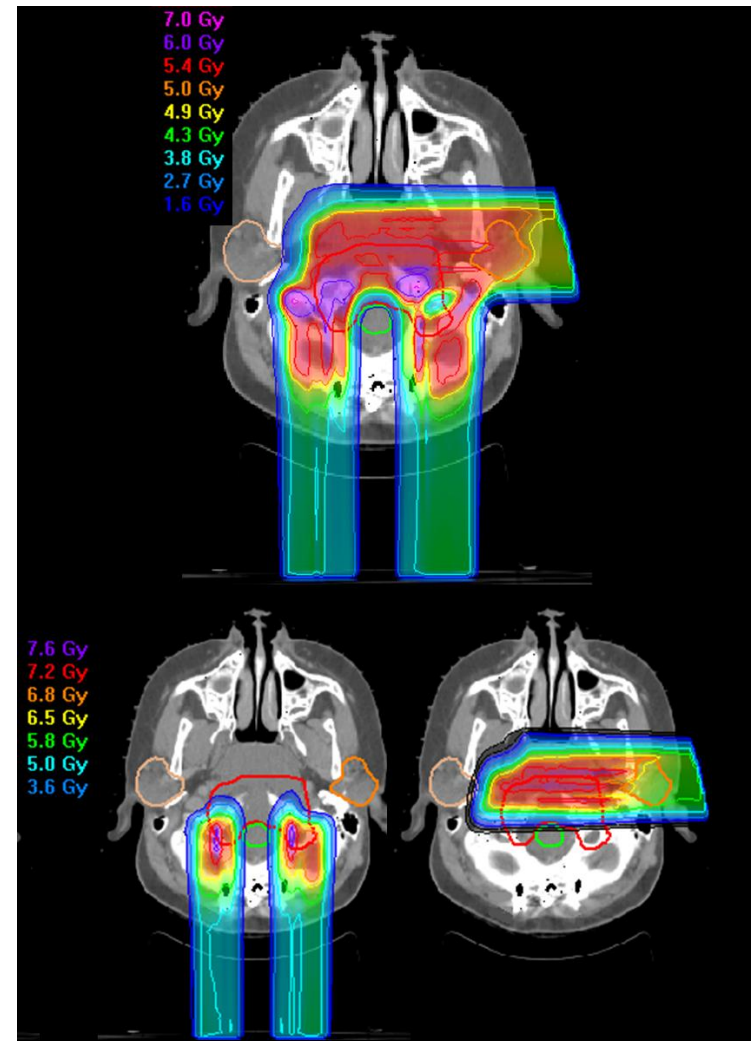
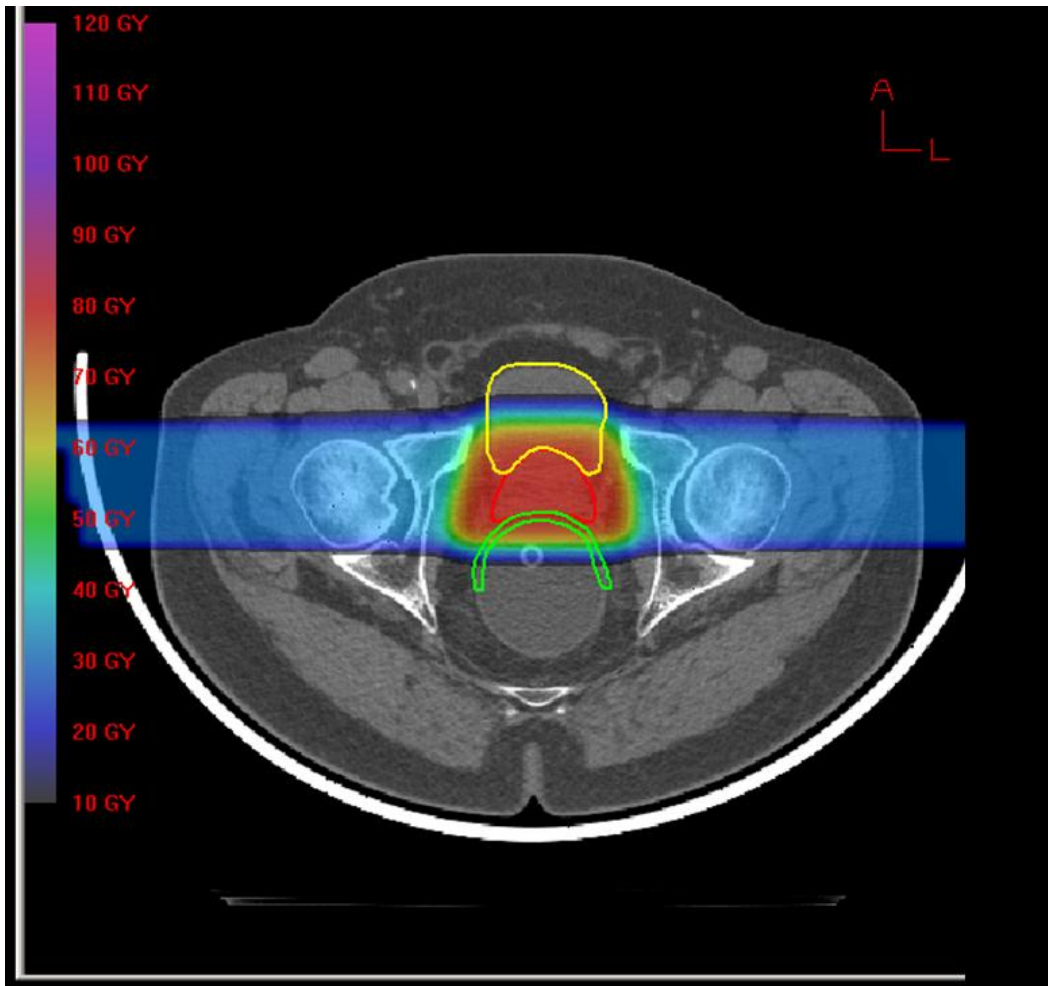


Proton Therapy

Simple

Complex

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Simple, Intermediate and Complex Proton Treatment Implications

- Intermediate and Complex procedures require more time and effort for planning and treatment, and should be reimbursed more than simple procedures.
- The current disparity in reimbursement rates between simple and intermediate/complex could create an incentive for simple procedures to be prioritized over intermediate/complex, thus adversely impacting patients who need intermediate/complex proton therapy treatment, such as head and neck and pediatric patients.
- The rate disparity could limit patient access (particularly for complex cases).

APC	Title	2013 Rate
0664	Level I Proton Beam Radiation Therapy (Simple)	\$1169
0667	Level II Proton Beam Radiation Therapy (Intermediate and Complex)	\$702

Impact of CY 2013 Rates

- By setting the intermediate and complex rates 39% lower than simple cases, the CY2013 rates create a perverse economic incentive to prioritize simple cases over intermediate and complex cases and do not reimburse proton therapy treatment relative to the corresponding levels of complexity.

Recommendation

- We request that the HOP Panel urge CMS to set reimbursement rates based on the complexity of cases and that the CY2013 rates that reimburse intermediate and complex cases less than simple cases not be replicated in CY2014.

Rationale for the Change



- A failure to set future rates based on the complexity of cases could lead to simple cases being prioritized over intermediate and complex cases, and could negatively impact patient care and patient access.