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Complexity Adjustment

Hospital Outpatient and Ambulatory Surgical Center

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What is a complexity adjustment?



A complexity adjustment provides increased payment for certain Medicare fee-for-service (FFS) outpatient services¹

Hospital Outpatient Department

Qualifying paired service code combination performed in a **Hospital Outpatient Department (HOPD)** is promoted to the next higher paying C-APC in the same clinical family

Ambulatory Surgical Center

A new C code that describes a code combination of a primary and an add-on procedure performed in an **Ambulatory Surgical Center (ASC)** receives a higher payment

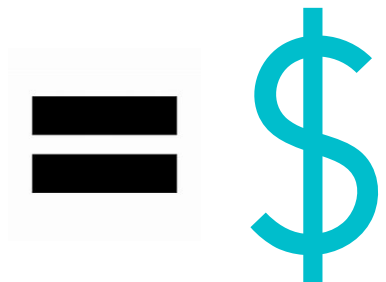


¹ Medicare Program: Hospital Outpatient Prospective Payment and Ambulatory Surgical Center Payment Systems and Quality Reporting Programs; Organ Acquisition; Rural Emergency Hospitals: Payment Policies, Conditions of Participation, Provider Enrollment, Physician Self-Referral; New Service Category for Hospital Outpatient Department Prior Authorization Process; Overall Hospital Quality Star Rating; COVID-19, 87 Fed. Reg. 71748 (November 23, 2022) (to be codified at 42 C.F.R. pts. 405, 410, 411, 412, 413, 416, 419, 424, 485, & 489). Page 16.

How does C-APC work¹? **H**



C-APC²




- 1** A covered primary outpatient service is classified into an APC. Clinically and financially similar services are in the same APC.
- 2** Each APC bundles integral items and services with the primary service.
- 3** In a case of multiple primary services provided in an outpatient encounter, the costliest primary service drives the APC assignment.
- 4** A single payment applies for a C-APC.
- 5** For qualifying paired primary services, a complexity adjustment is applied by promoting the service to the next higher paying C-APC in the same clinical family unless the current payment is already at the highest level within the clinical APC family.
- 6** Some items must be paid separately by statute (e.g., pass-through devices and drugs, vaccines).
- 7** Physician and other professional services are paid separately and are not part of the APC payment.

¹ Medicare Program: Hospital Outpatient Prospective Payment and Ambulatory Surgical Center Payment Systems and Quality Reporting Programs; Organ Acquisition; Rural Emergency Hospitals: Payment Policies, Conditions of Participation, Provider Enrollment, Physician Self-Referral; New Service Category for Hospital Outpatient Department Prior Authorization Process; Overall Hospital Quality Star Rating; COVID-19, 87 Fed. Reg. 71748 (November 23, 2022) (to be codified at 42 C.F.R. pts. 405, 410, 411, 412, 413, 416, 419, 424, 485, & 489). Pages 55-63.

² C-APC = Comprehensive Ambulatory Payment Classification

C-APC 2023 National Base Payments **H**



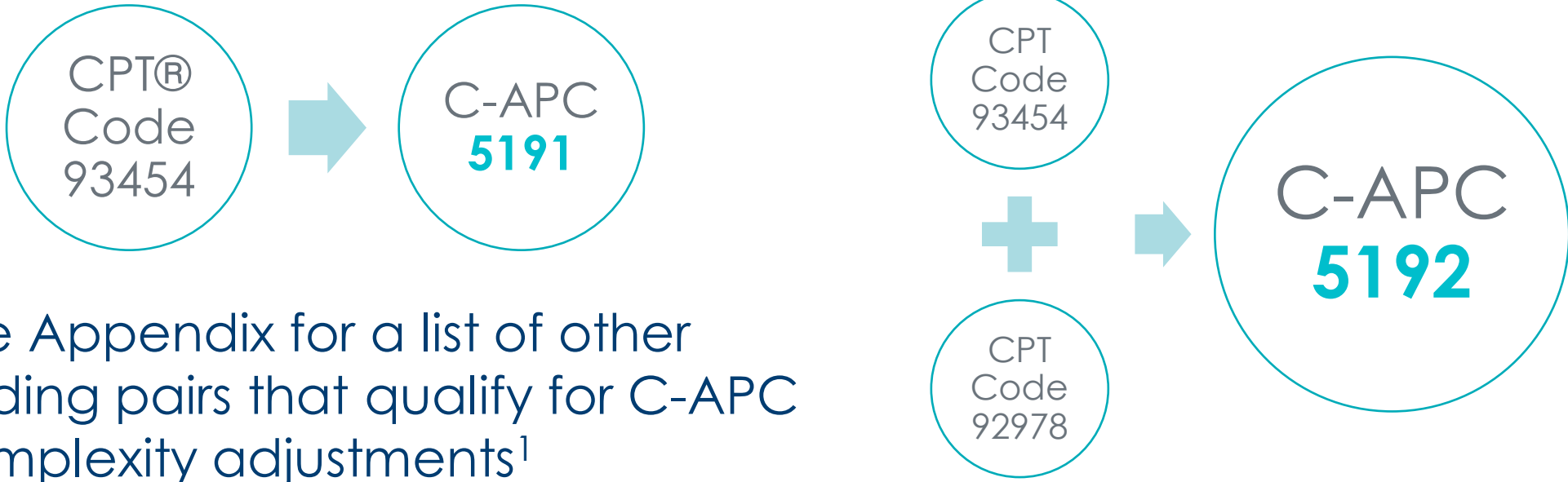
C-APC Code	C-APC Code Description	CY ¹ 2023 CMS ² National Base Rate ³
5191	Level 1 Endovascular Procedures	\$2,958
5192	Level 2 Endovascular Procedures	\$5,215
5193	Level 3 Endovascular Procedures	\$10,615
5194	Level 4 Endovascular Procedures	\$17,178

¹ Calendar Year

² License Agreement | Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved February 9, 2023, from <https://www.cms.gov/license/ama?file=/files/zip/january-2023-ops-addendum-updated-01/20/2023.zip>.

³ C-APC rates vary by hospital

C-APC Complexity Adjustment Example H



See Appendix for a list of other coding pairs that qualify for C-APC complexity adjustments¹

CPT Code	CPT Code Description
93454	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation
92978	Endoluminal imaging of coronary vessel or graft using intravascular ultrasound (IVUS) or optical coherence tomography (OCT) during diagnostic evaluation and/or therapeutic intervention including imaging supervision, interpretation and report; initial vessel (List separately in addition to code for primary procedure)

¹ Centers for Medicare & Medicaid Services updates the lists annually based on volume and cost threshold.

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C-Code Complexity Adjustment Example



See Appendix for a list of new C-Codes with higher complexity adjusted ASC payments¹ and 2023 national payments

HCPCS Code	HCPCS Code Description
93454	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation
92978	Endoluminal imaging of coronary vessel or graft using intravascular ultrasound (IVUS) or optical coherence tomography (OCT) during diagnostic evaluation and/or therapeutic intervention including imaging supervision, interpretation and report; initial vessel (List separately in addition to code for primary procedure)
C7516	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, with endoluminal imaging of initial coronary vessel or graft using intravascular ultrasound (IVUS) or optical coherence tomography (OCT) during diagnostic evaluation and/or therapeutic intervention including imaging supervision, interpretation and report

¹ Centers for Medicare & Medicaid Services updates the lists annually based on volume and cost threshold.

A man with a beard and short hair, wearing a teal polo shirt, is shown in profile, looking towards the right. He is in a clinical or hospital setting, with medical equipment and bright lights visible in the background. A teal rectangular box is overlaid on the right side of the image, containing white text.

Appendix

(CMS updates lists annually based on volume and cost threshold)

C-APC Complexity Adjustment Coding Pairs **H**



Complexity Adjustments from C-APC 5191 to C-APC 5192¹

CPT® Code	CPT Code Description		CPT Code	CPT Code Description
93454	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation		92978	Endoluminal imaging of coronary vessel or graft using intravascular ultrasound (IVUS) or optical coherence tomography (OCT) during diagnostic evaluation and/or therapeutic intervention including imaging supervision, interpretation and report; initial vessel (List separately in addition to code for primary procedure)
93455	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with catheter placement(s) in bypass graft(s) (internal mammary, free arterial, venous grafts) including intraprocedural injection(s) for bypass graft angiography			
93456	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with right heart catheterization			
93458	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with left heart catheterization including intraprocedural	+		
93459	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with left heart catheterization including intraprocedural injection(s) for left ventriculography, when performed, catheter placement(s) in bypass graft(s) (internal mammary, free arterial, venous grafts) with bypass graft angiography			
93460	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with right and left heart catheterization including intraprocedural injection(s) for left ventriculography, when performed			

¹ See Appendix J of 2023 NFRM Addenda for comprehensive list of qualifying coding pairs in License Agreement | Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved November 1, 2022, from <https://www.cms.gov/license/ama?file=/files/zip/2023-nfrm-opps-addenda.zip>.

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C-APC Complexity Adjustment Coding Pairs **H**



Complexity Adjustments from C-APC 5191 to C-APC 5192¹

CPT Code	CPT Code Description		CPT Code	CPT Code Description
93455	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with catheter placement(s) in bypass graft(s) (internal mammary, free arterial, venous grafts) including intraprocedural injection(s) for bypass graft angiography			
93456	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with right heart catheterization			
93457	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with catheter placement(s) in bypass graft(s) (internal mammary, free arterial, venous grafts) including intraprocedural injection(s) for bypass graft angiography and right heart catheterization			
93458	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with left heart catheterization including intraprocedural			
93459	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with left heart catheterization including intraprocedural injection(s) for left ventriculography, when performed, catheter placement(s) in bypass graft(s) (internal mammary, free arterial, venous grafts) with bypass graft angiography	+	93571	Intravascular Doppler velocity and/or pressure derived coronary flow reserve measurement (coronary vessel or graft) during coronary angiography including pharmacologically induced stress; initial vessel (List separately in addition to code for primary procedure)
93460	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with right and left heart catheterization including intraprocedural injection(s) for left ventriculography, when performed			
93461	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with right and left heart catheterization including intraprocedural injection(s) for left ventriculography, when performed, catheter placement(s) in bypass graft(s) (internal mammary, free arterial, venous grafts) with bypass graft angiography			

¹ See Appendix J of 2023 NFRM Addenda for comprehensive list of qualifying coding pairs in License Agreement | Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved November 1, 2022, from <https://www.cms.gov/license/ama?file=/files/zip/2023-nfrm-opps-addenda.zip>.

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C-APC Complexity Adjustment Coding Pairs **H**



Complexity Adjustments from C-APC 5191 to C-APC 5192¹

CPT Code	CPT Code Description		CPT Code	CPT Code Description
93451	Right heart catheterization including measurement(s) of oxygen saturation and cardiac output, when performed	+	93451	Right heart catheterization including measurement(s) of oxygen saturation and cardiac output, when performed
93458	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with left heart catheterization including intraprocedural	+	93454	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation
			93458	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with left heart catheterization including intraprocedural

¹ See Appendix J of 2023 NFRM Addenda for comprehensive list of qualifying coding pairs in License Agreement | Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved November 1, 2022, from <https://www.cms.gov/license/ama?file=/files/zip/2023-nfrm-opps-addenda.zip>.

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C-APC Complexity Adjustment Coding Pairs **H**



Complexity Adjustments from C-APC 5192 to C-APC 5193¹

CPT Code	CPT Code Description		CPT Code	CPT Code Description
92920	Percutaneous transluminal coronary angioplasty; single major coronary artery or branch	+	92920	Percutaneous transluminal coronary angioplasty; single major coronary artery or branch
			92974	Transcatheter placement of radiation delivery device for subsequent coronary intravascular brachytherapy (List separately in addition to code for primary procedure)
			93456	Catheter placement in coronary artery(s) for coronary angiography, including intraprocedural injection(s) for coronary angiography, imaging supervision and interpretation; with right heart catheterization

Complexity Adjustments from C-APC 5193 to C-APC 5194¹

HCPCS Code	HCPCS Code Description		HCPCS Code	HCPCS Code Description
92924	Percutaneous transluminal coronary atherectomy, with coronary angioplasty when performed; single major coronary artery or branch	+	92920	Percutaneous transluminal coronary angioplasty; single major coronary artery or branch
			C9600	Percutaneous transcatheter placement of drug eluting intracoronary stent(s), with coronary angioplasty when performed; single major coronary artery or branch
C9600	Percutaneous transcatheter placement of drug eluting intracoronary stent(s), with coronary angioplasty when performed; single major coronary artery or branch	+	33285	Insertion, subcutaneous cardiac rhythm monitor, including programming

¹ See Appendix J of 2023 NFRM Addenda for comprehensive list of qualifying coding pairs in License Agreement | Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved November 1, 2022, from <https://www.cms.gov/license/ama?file=/files/zip/2023-nfrm-opps-addenda.zip>.

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Complexity Adjustment C-Codes¹



Diagnostic Cardiac Catheterization with IVUS

HCPCS Code	CMS Short Description	CPT Code	CMS Short Description (see page 9 for Long Description)		CPT Code	CPT Code Description	CY 2023 National Payment ²
C7516	Cor angio w/ ivus or oct	93454	Coronary artery angio s&i	+	92978	Endoluminal imaging of coronary vessel or graft using intravascular ultrasound (IVUS) or optical coherence tomography (OCT) during diagnostic evaluation and/or therapeutic intervention including imaging supervision, interpretation and report; initial vessel (List separately in addition to code for primary procedure)	\$2,327
C7518	Cor/grft angio w/ ivus or oct	93455	Coronary art/grft angio s&i				
C7521	R hrt angio w/ ivus or oct	93456	R hrt coronary artery angio				
C7523	L hrt angio w/ ivus or oct	93458	L hrt artery/ventricle angio				
C7525	L hrt grft ang w/ ivus or oct	93459	L hrt art/grft angio				
C7527	R&L hrt angio w/ ivus or oct	93460	R&L hrt art/ventricle angio				

Angioplasty with Brachytherapy

HCPCS Code	CMS Short Description	CPT Code	CPT Code Description		CPT Code	CPT Code Description	CY 2023 National Payment ²
C7533	PTCA w/ plcmt brachytx dev	92920	Percutaneous transluminal coronary angioplasty; single major coronary artery or branch	+	92974	Transcatheter placement of radiation delivery device for subsequent coronary intravascular brachytherapy (list separately in addition to code for primary procedure)primary procedure)	\$5,526

¹ See ASC Annual Policy Files Related Links for comprehensive list of new complexity adjustment C-Codes in Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved November 1, 2022, from <https://www.cms.gov/license/ama?file=/files/zip/2023-final-asc-code-pair-crosswalk-table.zip>.

² Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved November 2, 2023, from <https://www.cms.gov/license/ama?file=/files/zip/2023-nfrm-addendum-aa-bb-dd1-dd2-ee-and-ff.zip>.

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Complexity Adjustment C-Codes¹



Diagnostic Cardiac Catheterization with FFR

HCPCS Code	CMS Short Description	CPT Code	CMS Short Description (see page 10 for Long Description)		CPT Code	CPT Code Description	CY 2023 National Payment ²
C7519	Cor/grft angio w/ flow resrv	93455	Coronary art/grft angio s&i	+	93571	Intravascular Doppler velocity and/or pressure derived coronary flow reserve measurement (coronary vessel or graft) during coronary angiography including pharmacologically induced stress; initial vessel (List separately in addition to code for primary procedure)	\$2,327
C7522	R hrt angio w/flow resrv	93456	R hrt coronary artery angio				
C7524	L hrt angio w/flow resrv	93458	L hrt artery/ventricle angio				
C7526	L hrt grft ang w/flow resrv	93459	L hrt art/grft angio				
C7528	R&L hrt angio w/flow resrv	93460	R&L hrt art/ventricle angio				
C7529	R&L hrt grft ang w/flow resrv	93461	R&L hrt art/ventricle angio				
C7552	R hrt art/grft ang hrt flow	93457	R hrt art/grft angio				

¹ See ASC Annual Policy Files Related Links for comprehensive list of new complexity adjustment C-Codes in Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved November 1, 2022, from <https://www.cms.gov/license/ama?file=/files/zip/2023-final-asc-code-pair-crosswalk-table.zip>.

² Centers for Medicare & Medicaid Services. (n.d.). www.cms.gov. Retrieved November 2, 2023, from <https://www.cms.gov/license/ama?file=/files/zip/2023-nfrm-addendum-aa-bb-dd1-dd2-ee-and-ff.zip>. CPT® Copyright 2022 American Medical Association. All rights reserved. CPT is a registered trademark with the American Medical Association