## MPFS Final Rule 2026

Updates and Readiness



01

Every practice is unique, and it is the Client's responsibility to implement these opinions appropriately to Client's specific practice and circumstances. Client is not under the obligation to implement any recommendations made by RBS. Recommendations made by RBS are our opinions only, and Client should consult an attorney regarding the application of these recommendations in Client's specific market and circumstance. RBS is not a law firm and is not providing legal advice to Client.



#### Disclaimers

02

Client agrees to indemnify and hold RBS, its affiliates and owners, and their respective officers, directors, agents, employees and representatives (each an "RBS Indemnified Party") harmless from and against any and all claims, actions, liabilities, losses, costs and expenses of any nature whatsoever, including reasonable attorneys' fees and other costs of investigating and defending any such claim or action ("Losses"), which may be asserted against any of RBS Indemnified Parties, in connection with Client's decision to implement any recommendations made by RBS.

03

CPT copyright 2025 American Medical Association. All rights reserved. Fee schedules, relative value units, conversion factors and/or related components are not assigned by the AMA, are not part of CPT, and the AMA is not recommending their use. The AMA does not directly or indirectly practice medicine or dispense medical services. The AMA assumes no liability for data contained or not contained herein. CPT is a registered trademark of the American Medical Association.



## MPFS Final Rule Updates

**External Beam Treatment Delivery Code Updates** 

**Image Guidance Code Updates** 

**Surface Treatment Updates** 

**Physician Supervision and Telehealth Services Updates** 

Work RVU, Practice Expense RVU, and Conversion Factor Updates



## Treatment Code Changes

Treatment codes are valued based on OPPS rates.

HCPCS G6003-G6016 are deleted.

Report 77402, 77407, 77412 for daily treatment.

No separate codes for IMRT (77385, 77386 were deleted).

All treatment codes include technical IGRT.



CPT 77014, HCPCS G6001-G6002, G6017 are deleted.

### IGRT Code Changes

Report 77387-26 for all types of IGRT and SGRT.

Reimbursement is professional only.

Port films (77417) are no longer reimbursed.



#### 2025-2026 CPT Comparisons



СРТ	CY 2025 Long Descriptor CY 2026 Long Descriptor		
77401	Radiation treatment delivery, superficial and/or ortho voltage, per day  Deleted		
77402	Radiation treatment delivery; Level 1 (for example, single electron fields, or 2D photons), including imaging guid when performed		
77407	Radiation treatment delivery, >=1 MeV; intermediate  Radiation treatment delivery; Level 2, single isocenter (eg, 3D or photons, including imaging guidance, when performed		
77412	Radiation treatment delivery, >=1 MeV; complex	Radiation treatment delivery; Level 3, multiple isocenters with photon therapy (for example, 2D, 3D, or IMRT) OR a single isocenter photon therapy (eg, 3D or IMRT) with active motion management, OR total skin electrons, OR mixed electron/photon field(s), including imaging guidance, when performed	
77385	Intensity modulated radiation treatment delivery (IMRT), includes guidance and tracking, when performed; simple	Deleted	
77386	Intensity modulated radiation treatment delivery (IMRT), includes guidance and tracking, when performed; complex	Deleted	
77387	Guidance for localization of target volume for delivery of radiation treatment, includes intrafraction tracking, when performed		
77014	Computed tomography guidance for placement of radiation therapy fields	Deleted	
77417	Therapeutic radiology port image(s)		

# Coding Updates

Treatment and IGRT

Global Freestanding Center					
	2025 HCPCS	2026 HCPCS			
2D Treatment	G6003-G6014	77402			
3D Treatment	G6003-G6014	77407-77412			
IMRT Treatment	G6015-G6016	77407-77412			
CT Guidance	77014	77387-26			
Stereo Guidance	G6002	77387-26			
SGRT	G6017	77387-26			



#### 2026 Treatment Codes and Rates

Non-Stereotactic Daily Treatment

#### 77402 Level 1 \$79.49 MPFS

Radiation treatment delivery; Level 1 (for example, single electron field, multiple electron fields, or 2D photons), including imaging guidance, when performed

#### 77407 Level 2 \$317.64 MPFS

Radiation treatment delivery; Level 2, single isocenter (eg, 3D or IMRT), photons, including imaging guidance, when performed

#### 77412 Level 3 \$391.46 MPFS

Radiation treatment delivery; Level 3, multiple isocenters with photon therapy (for example, 2D, 3D, or IMRT) OR a single isocenter photon therapy (eg, 3D or IMRT) with active motion management, OR total skin electrons, OR mixed electron/photon field(s), including imaging guidance, when performed





## Image Guidance Rate

**Including SGRT** 

77387-26 \$36.74 MPFS

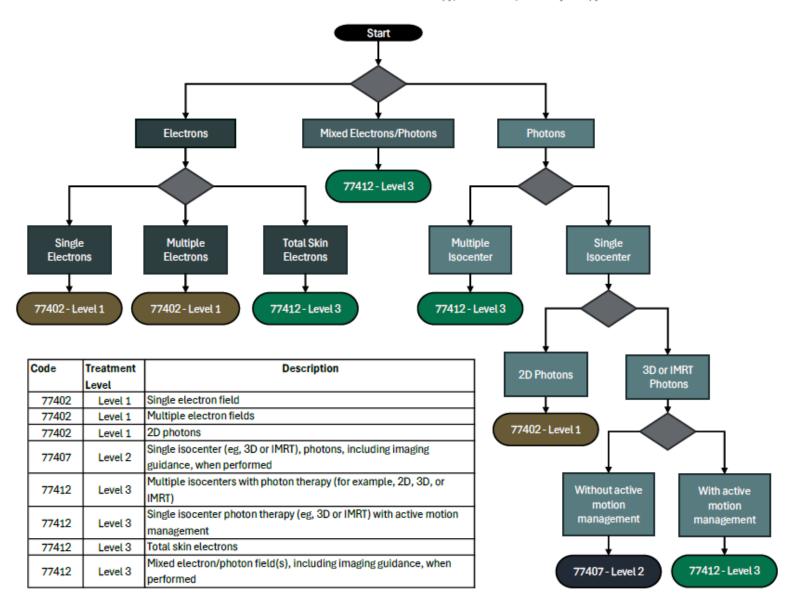
Guidance for localization of target volume for delivery of radiation treatment, includes intrafraction tracking, when performed



#### 2026 Radiation Oncology Treatment Code Changes

2D, 3D, and Intensity Modulated Radiation Therapy (IMRT)

\*Not to be used for Proton Therapy, Stereotactic, or Brachytherapy



#### Other Notable Rate Updates for 2026

Most notable rate increases for 2026

DI	7	7	2	n	4
Р І			J)	U	

2026 \$1,978.00 2025 \$1,797.82

Difference \$180.18 10%

#### **CPT 77336**

2026 \$93.19 2025 \$88.63

Difference \$4.56 5%

#### **CPT 77370**

2026 \$152.64 2025 \$145.56

Difference \$7.08 5%

#### **CPT 77373**

2026 \$988.00 2025 \$949.37

Difference \$38.63 4%

#### **CPT 77427**

2025 \$196.73 2026 \$187.93

Difference \$8.80 5%



### Surface Treatment Coding

CPT 77401 is deleted.

A new single CPT code for simulation and planning.

A new treatment code for <150kV per fraction.

A new treatment code for 150kV-500kV per fraction.

An image guidance code reported once per course.



#### Surface Treatment Code Set

СРТ	Long Descriptor
77436	Surface radiation therapy; superficial or orthovoltage, treatment planning and simulation-aided field setting
77437	Surface radiation therapy; superficial, delivery, ≤150 kV, per fraction (eg, electronic brachytherapy)
77438	Surface radiation therapy; orthovoltage, delivery, >150-500 kV, per fraction
77439	Surface radiation therapy; superficial or orthovoltage, image guidance, ultrasound for placement of radiation therapy fields for treatment of cutaneous tumors, per course of treatment (List separately in addition to code for primary procedure)





## Physician Supervision Updates

#### **Direct Supervision**

The definition of direct supervision now includes language allowing for real-time video and audio interactive communications.

This includes radiation treatment delivery in the freestanding setting.



## Telehealth Updates

## Elimination of Provisional Status for Telehealth CPT Codes

CPT Code 77427 is on the permanent telehealth list.

- It requires the use of video (cannot use audio only) and a 95 modifier must be added.
- All other OTV codes (77431, 77432, 77435) require an inperson visit.



# Work RVU Updates

2.5% Reduction

- This reduction applies to non-time-based services.
- Notable exclusions:
  - Time-based codes (e.g., Evaluation & Management, care management, behavioral health)
  - Services on the CMS telehealth list
  - New codes for CY 2026, even if they would otherwise fall under non-time-based services.
- This will be a major impact on physicians who are compensated based on their work RVUs.



## Conversion Factor 2026

Based on APM Participation

- Providers participating in an Advanced Payment Model will have a conversion factor of \$33.5675.
  - Check a provider's APM status here: <a href="https://qpp.cms.gov/participation-lookup">https://qpp.cms.gov/participation-lookup</a>
- Providers not participating in an Advanced Payment Model will have a conversion factor of \$33.4009.
- Both new conversion factors represent an increase from the 2025 conversion factor of \$32.3465.



## Practice Expense Refinements

Correction of disparity between facility and non-facility settings

Updates to direct practice expenses

- Utilized OPPS APC data for PFS rate setting.
- Updated direct practice expense factors (staff and supply costs) for 2026 for CPT codes 77402-77412
- Added direct practice expense factors for 77436-77439
- Updated the linac and water chiller costs
- Updated the superficial system cost
- Updated the prostate spacer kit cost and included it in CPT 55874



#### Links

- CMS fact sheet on the CY 2026 Physician Fee Schedule Final Rule:
  - https://www.cms.gov/newsroom/fact-sheets/calendaryear-cy-2026-medicare-physician-fee-schedule-final-rulecms-1832-f
- CY 2026 PFS Final Rule:
  - https://www.federalregister.gov/documents/2025/11/05/20 25-19787/medicare-and-medicaid-programs-cy-2026payment-policies-under-the-physician-fee-schedule-andother

#### Readiness List for 2026

Update all CPT codes and the code sets within your EHR.

Check all prior authorizations that extend into 2026.

Pull all carrier contracts to check for fee schedule language.

Additional considerations for Proton centers.





## EHR Updates

Timeline: Now

- ARIA users:
  - Update CPT codes in data administration.
  - Update activity code sets in data administration.
- Mosaiq users:
  - Update CPT codes in the code library.
  - Update code sets and orders in the code library.
- Epic/billing systems:
  - Update charge master to include all new codes.



#### Prior Authorization

Timeline: December 15th

- Identify all patients on treat that will treat into 2026. Add all new starts after the initial list is made.
- Most Medicare Advantage plan auths expire 12/31 each year and will require a new auth for 2026.
  - Check any auths that expire after 12/31.
- Check all commercial plans for authorization update requirements in 2026.
- Keep a list of payers, narrowed down by types, of all payer requirements for CPT codes.
  - Include the effective dates of their changes from the old code set to the new one.



# Fee Schedule Updates

Timeline: Now

- Contracts based on the Medicare fee schedule or on RVUs:
  - Ensure each payer is ready to accept and process the new code sets.
  - Are there any expected delays in claims processing?
- Contracts based on other criteria:
  - Will each payer will be ready to accept the new code set with updated rates?
  - If not, will they continue to process the old code sets for payment?
  - Do new fee schedules need to be negotiated?



### Proton Centers

Timeline: Now

- Proton technical IGRT will no longer be reimbursed.
  - In the freestanding setting, has your MAC re-valued their carrier pricing to include the technical IGRT amount?
  - Do the OPPS rates for 2026 for the Proton APCs align with your MAC's carrier price?



# Questions & Answers

Leah M. Harlin, CPC Director of Shared Services

Leah.Harlin@RadiationBusiness.com

Radiation Business Solutions
<a href="https://www.RadiationBusiness.com">www.RadiationBusiness.com</a>
(615) 746-4711

