



Medicare OPPS Proposed Rule Impact Analysis

Calendar Year 2025 | Version 1

Analysis Description

The calendar year (CY) 2025 Medicare Outpatient Prospective Payment System (OPPS) Proposed Rule Analysis is intended to show providers how Medicare outpatient fee-for-service (FFS) payments would change from CY 2024 to CY 2025 based on the policies set forth in the CY 2025 OPPS proposed rule.

CY 2025 OPPS Proposed Rule Changes Modeled in This Analysis:

- Market Basket Update: 3.0% market basket increase to the outpatient rate.
- ACA-Mandated Market Basket Adjustment: -0.4 percentage point productivity adjustment to the market basket authorized by the Affordable Care Act (ACA) of 2010.
- Budget Neutrality Adjustments: Reflects the impact of adjustments to the rate based on changes to the wage index (+0.26%), 5% stop loss transition wage index (-0.18%), cancer hospital payments (+0.06%), as well as pass-through spending/outlier payments (-0.45%), and other budget neutrality in order to maintain program budget neutrality. CMS did not provide individual budget neutrality factors for wage index budget neutrality due to wage data changes and the budget neutrality factor to offset the bottom quartile increase of wage indexes. Therefore, the budget neutrality to offset the increase to the bottom quartile of wage indexes is included in this line.
- Wage Index (Removal of Previous Bottom Quartile and Stop Loss (including rural floor)): Removal of the previous bottom quartile and stop loss adjustments to get a CY 2024 base wage index value that includes adjustments for the rural floor.
- Wage Index (Removal of Previous Rural Floor Budget Neutrality): Removal of the previous rural floor budget neutrality from the previous year wage index.
- Wage Index (Removal of Previous Rural Floor Wage Index): Removal of the rural floor from the previous year wage index to get a base wage index with no adjustments.

- Wage Index (Change due to Wage Index and Labor Share prior to rural floor): Updated wage index values based on the federal fiscal year (FFY) 2025 Inpatient PPS (IPPS) proposed base hospital wage indexes compared to the FFY 2024 IPPS hospital final wage indexes, including the impact of new wage data, reclassifications, rural and legislated floors, and other adjustments to the wage indexes. This value does not include the CMS increase to the wage index of hospitals in the bottom quartile of wage index values nationally, the 5% wage index stop loss, nor the rural floor adjustments.
- Wage Index (Current Rural Floor Wage Index Added): The current year wage index with the addition of the rural floor adjustments.
- Wage Index (Current Rural Floor Budget Neutrality Added): The current year wage index with the addition of the rural floor budget neutrality.
- Increasing Bottom Quartile Wage Index Values: Reflects the estimated impact of CMS' increase to the wage index for hospitals with a wage index value in the bottom quartile of the nation. This increase is half of the difference between the hospital's pre-adjustment wage index, and the 25th percentile wage index value across all hospitals. This increase is offset by a budget neutrality adjustment to OPSS conversion factor. The impacts of these individual components are broken out separately and are calculated using CMS' FFY 2025 IPPS proposed rule correction notice wage index tables. CMS did not provide individual budget neutrality factors for wage index budget neutrality due to wage data changes and the budget neutrality factor to offset the bottom quartile increase of wage indexes. Therefore, in this analysis the budget neutrality to offset the increase to the bottom quartile of wage indexes is included in the "other budget neutrality" line rather than this line.
- 5% Stop Loss Transition Wage Index: CY 2024 5% stop loss cap for eligible hospitals whose CY 2025 wage index that was less than 95% of what it was for CY 2024.
- Ambulatory Payment Classification (APC) Factor/Updates: This impact represents the changes to the APC assignments and weights proposed for CY 2025. It is inclusive of CMS' policies regarding the creation of comprehensive APCs, the expansion of the categories of items/services that are packaged into APCs for payment as opposed to separately paid, and the anticipated change in outlier payments. This impact is derived by attributing all remaining payment changes to this category (after impact for wage index, market basket, etc.).
- Change in Rural Adjustment: Payment change due to the change in the rural status of provider.

The impact in the analysis does not include the impact of the sequestration reduction to all lines of Medicare payment authorized by Congress through FFY 2032. The impact of the sequester applicable to OPSS-specific payment has been calculated separately and is provided below the impact table.

The second tab of the report lists a hospital's highest (up to 25) Medicare FFS APCs, ranked by difference from year to year in unadjusted payments. Payments are not calculated for procedures that CMS did not provide a payment for in the standard analytic file (SAF). In addition, payments for subsequent surgical procedures on the same claim have been discounted. However, volumes are inclusive of all procedures performed, regardless of payment. Therefore, volumes multiplied by wage index adjusted APC amounts may not always equal total payments.

Data Sources

Except where otherwise mentioned, hospital characteristics, outpatient procedure volumes, and estimated CYs 2024 and 2025 outpatient revenues are from the CY 2025 OPSS proposed rule Impact File (CY 2023 outpatient claims data). OPSS conversion factors are from the CY 2024 final rule and the CY 2025 proposed rule. Wage indexes are based on the wage index tables from the FFYs 2024 IPPS final rule correction notice and 2025 IPPS proposed rule.

The impact of CMS' wage index policies is calculated using the FFY 2024 IPPS final rule correction notice and FFY 2025 IPPS proposed rule wage index tables.

Data for the top APCs are from the CY 2022 Medicare FFS 100% Outpatient SAF. APC weights are from Addendum A of the CY 2024 OPSS final rule and CY 2025 OPSS proposed rule, while payments are wage index adjusted when appropriate and include copayments. When an APC does not have a relative weight, the pay rate from the CY 2023 OPSS final rule or CY 2025 OPSS proposed rule Addendum A is used instead, as applicable. Hospital characteristics are from the CY 2024 OPSS final rule and CY 2025 OPSS proposed rule Impact Files. APCs and descriptions are from the CY 2025 OPSS proposed rule Addendum B. APC amounts may not always equal total payments. APCs with case counts less than 11 have been removed due to CMS' privacy rules.

This analysis was developed to measure the impact of OPSS policy changes only. Hospital volume and patient mix are held constant at the value published in the OPSS CY 2025 proposed rule.

Methods

Calculating Impacts by Component Change

The dollar impact of each component change has been calculated starting with estimated 2024 outpatient payments as provided by CMS in the CY 2025 OPSS proposed rule. Estimated 2024 outpatient payments include outliers and the rural Sole Community Hospital (SCH) add-on, where appropriate.

The CY 2024 to CY 2025 percent change, for each outpatient payment change component analyzed, is calculated and applied to estimated CY 2024 payments. Generally, the percentage impacts are applied sequentially in order to capture the compounded dollar impacts. For example, the percent change due to the market basket update is applied to total CY 2024 payments. Then, the percent change in the ACA-mandated market basket reductions is applied to the dollar result of the first change. This method continues for the remaining changes, creating a compounded effect. The difference between the results after each layered component is the impact of that component.

For changes to the OPSS rate and wage index, CY 2024 payments and volumes provided by CMS are divided into two parts based on the revenue and volumes from the 2023 SAF claims data in order to avoid applying market basket and wage index updates to payments not based on the OPSS conversion factor. The first part is made up of those services to which payment is based on the OPSS rate and is then adjusted by the changes to that rate and the wage index. The second part is made up of portion of those services for which payment is made outside of the rate (e.g., drugs paid at ASP+6%), which is held constant until changes to case mix and outliers are calculated.

Based on the limitations of CMS' OPPS Impact File, an "APC Factor/Updates" adjustment factor is calculated and used to estimate the value of payment changes that cannot be broken out by individual component. This hospital-specific factor/impact is derived by dividing total payments by the wage index and SCH add-on-adjusted conversion factor. The result of the first calculation is divided by the Medicare service count provided in the OPPS CY 2025 proposed rule Impact File. This factor impact represents the impact of changes to the APC assignments and weights and the outlier threshold.

Note: Individual percentages and dollars shown in this analysis may not add to total due to compounding and rounding. Dollar amounts less than \$50 and percentages less than 0.05% will appear as zeros due to rounding.

This analysis does not include payment estimates for services provided to Medicare Advantage patients or modifications in FFS payments as a result of provider participation in new payment models being tested under

Medicare demonstration/pilot programs. Dollar impacts in this analysis may differ from those provided by other organizations/associations due to differences in source data and analytic methods.