

Date: November 8, 2018

To: SPTA and Division Federal Advocacy Coordinators, and APAGS Coordinators

From: Doug Walter, J.D., Associate Executive Director for Government Relations  
Jared L. Skillings, PhD, ABPP, Chief of Professional Practice  
American Psychological Association Practice Organization

Cc: SPTA Directors of Professional Affairs  
SPTA Executive Directors  
CAPP; BPA  
APAPO Board of Directors

Re: Medicare 2019 Fee Schedule Final Rule

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On November 1, 2018 the Centers for Medicare and Medicaid Services (CMS) released the final rule on the 2019 Medicare fee schedule. We will be providing three information alerts on the rule. This first on psychological and neuropsychological testing services, and next week on payment rates for psychotherapy and health and behavioral services and finally how the Merit-based Incentive Payment System will impact psychologists in 2019.

We are very pleased to say that **NEARLY ALL psychologists will see higher Medicare payments for psychological and neuropsychological testing services** in 2019!

The APA's Practice Organization projects that in 2019 a typical 6-hour battery, comprised of 3 hours of testing administration and scoring along with 3 hours of interpretation and evaluation testing services will increase by the following percentages:

- 6-hours psychological testing administered and evaluated by professional +13%
- 6-hours technician administered psychological testing w/ professional evaluation +21.2%
- 6-hours neuropsychological testing administered and evaluated by professional +2.5%
- 6-hours technician administered neuropsychological testing w/ professional evaluation +5.9%
- 1-hour of the neurobehavioral status examination +2%

#### APA Advocacy for Testing Codes

The APA's Practice Organization actively participated in the development and valuation of the new codes. This advocacy led to more specific coding options for testing services by psychologists and by technicians under the psychologist's supervision, which will be implemented on January 1, 2019.

These new codes were created through the American Medical Association / Specialty Society Current Procedural Terminology (CPT®), and recommended values for the new codes were sent to CMS by the

Resource-based Relative Value Update Committee (RUC). At the end of 2017, RUC had recommended substantially lower payment rates for testing services in 2019. The APA Practice Organization fought to increase the value of psychological and neuropsychological testing under the new codes.

We argued that if implementing the new codes resulted in reimbursement cuts Medicare beneficiaries would lose access to these critical services. CMS agreed and announced higher rates in the proposed rule. Now in the final rule CMS has gone even further than it first proposed in raising the value of testing services. Based on the comments submitted by the APA Practice Organization and echoed by nearly 190 psychologists in their individual comments, the agency realized psychologists and neuropsychologists who administered their own tests rather than using technicians would see reduced payments under the new testing structure. To remedy this situation CMS increased the clinical labor time for professionally-administered testing services, thus raising the services' overall value.

We in the Practice Organization want to thank the many psychologists who answered our call to action in July and wrote to CMS to urge higher payments for these services. Your comments made a difference!

#### Educational Resources on the New 2019 Testing Codes

Since July, APA has provided a variety of resources to educate and prepare psychologists for the changes to the testing codes. Members can access the [new code numbers and descriptions](#), crosswalks—charts designed to help you determine which CPT code to use for a particular service, and additional resources in the [Reimbursement](#) section of the Practice Central website ([www.apapracticecentral.org](http://www.apapracticecentral.org)). Given the complex changes to the testing code structure, we also released an Up To Code article providing [guidance on how to use the new codes](#). A recording of the October webinar introducing the specific codes, descriptions and practical examples can be found by [clicking here](#). Following the release of the new family of testing codes and the October webinar, psychology and legal experts at APA addressed the most pressing questions submitted by members in this [Up To Code article](#).

Additional resources are in progress including materials to educate private insurance companies, clinical case examples, and 2 new webinars for members in December. [Join us](#) on Wednesday, Dec. 5th at 12pm EST as Antonio Puente, PhD, and Neil Pliskin, PhD continue discussing the changes to the codes covered in the July and October webinars along with introducing CMS's new payment rates. A question and answer style webinar with Dr. Puente and Dr. Pliskin will be held on Wednesday, Dec. 19th at 12pm EST to help members prepare for this transition. Registration coming soon! Please visit the [APA Practice Central website](#) for the most up-to-date information on our webinar series and to view past webinars.

Psychologists with questions about changes under the 2019 Medicare fee schedule are welcome to contact the Government Relations Office by telephone (202-336-5889) or email ([pracgovt@apa.org](mailto:pracgovt@apa.org))

**For more information, contact APA Practice Organization Government Relations Office at [Pracgovt@apa.org](mailto:Pracgovt@apa.org) or (202) 336-5889. Visit APA Practice Organization on-line at [APAPracticeCentral.org/Advocacy](http://APAPracticeCentral.org/Advocacy).**