

Section II.H.: Bundled Payments Under the PFS for Substance Use Disorders

CMS also finalized a bundled payment under the PFS for OUD treatment to create an avenue for physicians and other health professionals to bill for a bundle of office-based services similar to the new bundled OUD treatment services benefit available through OTPs. CMS is finalizing the creation of new coding and payment for a monthly bundle of services for the treatment of OUD that includes:

- Overall management
- Care coordination
- Individual and group psychotherapy
- Substance use counseling
- Add-on code for additional counseling

Two HCPCS G-codes will describe the monthly bundles of services for office-based OUD treatment, and an add-on code was created to account for extraordinary circumstances requiring additional treatment resources and effort:

1. **HCPCS code G2086** describes the initial month of treatment, which would include intake activities and development of a treatment plan, as well as assessments to aid in development of the treatment plan in addition to care coordination, individual therapy, group therapy, and counseling. It requires at least 70 minutes in the first calendar month.
2. **HCPCS code G2087** describes subsequent months of treatment including care coordination, individual therapy, group therapy, and counseling. It requires at least 60 minutes in a subsequent calendar month.
3. The add-on code, **HCPCS code G2088**, can be billed in circumstances when effective treatment requires additional resources for a patient that substantially exceed the resources included in the base codes. In other words, the add-on code would address extraordinary circumstances that are not contemplated by the bundled code. It can be billed for each additional 30 minutes beyond the first 120 minutes and should be listed separately in addition to code for primary procedure.

These codes are not limited to any particular physician or nonphysician practitioner (NPP) specialty, but CMS recommends that practitioners furnishing OUD treatment services should consult with addiction specialists, as clinically appropriate.

At least one psychotherapy service must be furnished in order to bill for HCPCS codes G2086 or G2087, as their payment rate incorporates the resource costs involved in furnishing psychotherapy.

CMS recognizes that stable patients may not require monthly psychotherapy and encourages clinicians to use existing codes that describe care management services (CPT codes 99484, 99492, 99493, and 99494) and E/M services rather than the new codes for OUD service bundles for patients who do not require at least monthly psychotherapy.

Further, any of the individual therapy, group therapy and counseling services included in the new HCPCS codes G2086-G2088 can be furnished via telehealth, as clinically appropriate, in order to increase access to care for beneficiaries.

Unfortunately, CMS does not have the statutory authority to eliminate the deductible and coinsurance requirements for the bundled OUD treatment services under the PFS.

2020 NATIONAL MEDICARE PAYMENT RATES

HCPCS	Description	Office Payment	Facility Payment
G2086	Office based OUD treatment, initial month, requires 70+ minutes in calendar month	\$413.22	\$301.35
G2087	Office based OUD treatment, subsequent months, requires 60+ minutes in calendar month	\$368.47	\$293.77
G2088	Office based OUD treatment, each additional 30 minutes beyond initial 120 minutes	\$70.01	\$35.01