

CY27 Physician Fee Schedule Proposed Rule: Digital Health at a Glance



RPM / RTM CONTRACTOR BAN

- Only practice-employed staff, **not contractors**, can **bill** for remote monitoring services
- **Most Affected:** RPM / Digital Health Vendors



SaMS LAB ANALYSES ON LAB TESTS

- **New** PFS payment path for **algorithmic lab analysis**, separate from CLIA-certified labs
- **Most Affected:** Labs & AI / Health IT Vendors



DUPLICATE LAB / IMAGING INTEROP.

- Asking whether **interoperability** policy can **reduce unnecessary repeat labs and imaging**
- **Most Affected:** Diagnostic imaging vendors; health systems



MIPS AI & ePA INCENTIVES

- New **AI-use improvement activity**; ePA measure becomes mandatory in **2028**
- **Most Affected:** All Physician Practices & ACOs



AI IN PRIMARY CARE

- Exploring AI's role in **annual wellness visits** and primary care workflows
- **Most Affected:** AI / Health IT Vendors



CPT CODING SYSTEM ALTERNATIVE

- Requesting ideas to **replace CPT Codes** with a **prevention-focused payment model**
- **Most Affected:** All Physician Practices