



**UTAH DEPARTMENT OF
HEALTH & HUMAN
SERVICES**

**Division of Integrated
Healthcare**

**Medicaid Reimbursement Rate
Comparative Analysis – Radiology
Services**

June 2023



**MYERS AND
STAUFFER_{LC}**
CERTIFIED PUBLIC ACCOUNTANTS



Radiology Executive Summary and Background

Summary

Based on the rate research, Utah Medicaid reimbursement for radiology services is, on average, less than Medicare reimbursement and the average reimbursement levels of the other states surveyed. It should be noted that a comparison of fee schedule reimbursement rates does not provide a complete representation of reimbursement levels between Utah Medicaid, the Medicare program, and the other states in the research sample. For example, a comparatively high or low Utah Medicaid rate when compared to other states may signify a rate that is updated more frequently by Utah Medicaid than the other states. In addition, payment policies are often designed to address specific policy initiatives, so a Utah rate that appears higher than the comparison rate may result from a particular policy initiative designed to encourage access to or use of a particular service. Alternatively, a Utah rate that appears lower than the comparison rate may result because other states may have made targeted increases for specific services. Lastly, the impact of a high or low rate for a code is less meaningful if the code has low utilization. To understand the impact on reimbursement, the rates or the rate differential would need to be applied to utilization. Utah Medicaid utilization was not considered in this comparative analysis.

Background

The Utah Department of Health and Human Services, Division of Integrated Healthcare engaged Myers and Stauffer LC (Myers and Stauffer) to review and compare Utah Medicaid reimbursement rates to Medicare reimbursement rates and reimbursement rates from a sample of other state Medicaid programs for certain provider types and service categories. As part of this project, we have prepared a series of separate reports by service category. This report provides the results for radiology services, and is supported by a Microsoft Excel exhibit containing rate comparisons for the services analyzed.

The radiology services rate comparison applies to radiology procedure codes provided to us by Utah Medicaid. Utah Medicaid rates are compared to Medicare rates and are geographically adjusted for Utah, where available. The comparison to other state rates is based on a sample of six other states—Colorado, Idaho, Kentucky, Montana, Nevada, and New Mexico. These states were selected due to their proximity to Utah, with the exception of Kentucky, which was included in the study due to the availability of its rates to our research team.

For radiology services, we compared rates by Current Procedural Terminology code. Utah Medicaid provided a list of the top 25 radiology procedure codes based on Medicaid expenditures. Myers and Stauffer relied on the most recent publicly-available information regarding fee schedules from Medicare and the sample of other states. Medicare rates are from the January 2023 Medicare Physician Fee Schedule. Other state Medicaid rates are from published fee schedules obtained in March 2023, and the Utah Medicaid rates are rates effective July 1, 2023.



It is important to consider the following limitations when comparing reimbursement rates:

- *Government payers maintain more detailed information about fee schedules and underlying payment policies that may not be reflected in the information obtained from published fee schedules. Methodologies that Medicare and other state Medicaid programs use, and the resulting rates, are specific to their overall policies and economic environment, and it is important to understand there are policy decisions and unpublished context underlying the rate values. For example, a state may intentionally have a low rate for a certain procedure code to encourage utilization of another code or another service. The rate comparisons presented in this report did not include a comparison of underlying rate assumptions for rates from other payers or an analysis of broader state economic factors, as doing so would have been outside the scope of this project. The rate comparison serves to identify where Utah Medicaid rates fall in comparison to rates from a selection of other government payers.*
- *Information regarding the costs of radiology services are not included in this analysis and report. There is limited information available on provider costs for services reimbursed on a fee schedule basis. Cost information is more readily available for institutional services, such as hospital services.*
- *Differences in rate levels may not always be meaningful; they could be due to limited sample sizes, and/or differences in payment methodologies, and/or services covered. Additional research may be necessary to understand these variations.*
- *The rate comparison was limited in scope to comparing reimbursement rates. The comparison study and this report make no conclusions regarding the sufficiency of Utah Medicaid reimbursement rates, or recommendations that Utah Medicaid take any specific action. Information is presented for comparison purposes only.*

Reimbursement Rate Comparisons

The radiology services rate comparisons are summarized in this section. These rate comparisons serve as points of reference only, providing the opportunity to identify those services where Utah Medicaid rates appear high or low when compared to rates for similar services paid by Medicare and the comparison Medicaid states, where rates appear high or low as compared to rates for services in other service categories, or where rates within a service category vary significantly from one another.

The comparison of Utah rates to Medicare and a sample of other states is not intended to suggest a desired fee schedule amount or level of reimbursement. Health care payers, including Medicare and state Medicaid agencies, differ in how they determine benefits and define services, the limitations they place on services, who is eligible for the services, who the providers are that deliver the services, and numerous other factors that affect reimbursement methodologies and fees.



MEDICAID REIMBURSEMENT RATE COMPARATIVE ANALYSIS – RADIOLOGY

State legislation determines Medicaid agency budgets based on state revenues, and appropriations are authorized by the legislature and provide agencies with authority to expend funds. Therefore, state agencies are limited in amounts for reimbursement rates based on state budgets. In addition, the federal government’s share of a state’s expenditures through the Federal Medical Assistance Percentage (FMAP) varies by state and provides differing levels of federal support across states. Of the states included in the research sample, the highest FMAP rate for federal fiscal year 2023 is 72.59 percent for New Mexico, and the lowest is 50.00 percent for Colorado (the FMAP for Utah is 65.90 percent). Factors relating to state budgetary levels and federal financial assistance are not considered in this analysis.

We calculated two comparison rates to compare to Utah Medicaid rates. The first comparison rate is the Medicare rate, and the second comparison rate is the average of the six comparison state Medicaid program rates. This information made it possible to quantify how Utah Medicaid rates across services compare to other rates in the research sample by calculating the Utah Medicaid rate as a percent of the comparison rates.

Table 1 summarizes the comparison results by procedure code. Column E contains the Medicare comparison percentage, and column G contains the Medicaid comparison percentage.

Table 1. Radiology Services Rate Comparison

Radiology Services						
A	B	C	D	E	F	G
Procedure Code	Description	Utah Medicaid Rate	Medicare Comparison		Medicaid Comparison	
			Medicare Rate	Utah as % of Medicare Rate	Average of Other State Medicaid Rates	Utah as % of Other State Medicaid Rates
70549	MR ANGIOGRAPH,NECK;W/O CONTRAST,FOLLOW BY CONTRAST	\$477.72	\$342.81	139%	\$526.36	91%
71045	X-RAY EXAM CHEST 1 VIEW	\$7.65	\$24.89	31%	\$22.19	34%
71046	X-RAY EXAM CHEST 2 VIEWS	\$13.96	\$32.20	43%	\$30.94	45%
72040	RADIOLOGIC EXAM,SPINE,CERVICAL;TWO OR THREE VIEWS	\$14.47	\$37.85	38%	\$33.55	43%
72100	RADIOLOGIC EXAM,SPINE,LUMBOSACRAL;TWO/THRE E VIEWS	\$16.04	\$38.17	42%	\$35.62	45%
73030	RADIOLOGIC EXAM, SHOULDER; COMPLETE,MIN OF 2 VIEW	\$13.80	\$33.04	42%	\$29.18	47%
73060	RADIOLOGIC EXAM; HUMERUS, MINIMUM OF 2 VIEWS	\$13.80	\$30.80	45%	\$27.79	50%
73090	RADIOLOGIC EXAMINATION; FOREARM, TWO VIEWS	\$12.46	\$27.97	45%	\$25.21	49%



MEDICAID REIMBURSEMENT RATE COMPARATIVE ANALYSIS – RADIOLOGY

Radiology Services						
A	B	C	D	E	F	G
Procedure Code	Description	Utah Medicaid Rate	Medicare Comparison		Medicaid Comparison	
			Medicare Rate	Utah as % of Medicare Rate	Average of Other State Medicaid Rates	Utah as % of Other State Medicaid Rates
73100	RADIOLOGIC EXAMINATION, WRIST; TWO VIEWS	\$11.81	\$32.37	36%	\$26.81	44%
73120	RADIOLOGIC EXAM, HAND; 2 VIEWS	\$11.81	\$29.86	40%	\$24.52	48%
73502	X-RAY EXAM HIP UNI 2/3 VIEW	\$9.09	\$44.76	20%	\$40.14	23%
73521	X-RAY EXAM HIPS BI 2 VIEWS	\$9.36	\$39.42	24%	\$37.28	25%
73552	X-RAY EXAM OF FEMUR 2/>	\$7.67	\$33.99	23%	\$30.92	25%
73560	RADIOLOGIC EXAMINATION, KNEE; ONE OR TWO VIEWS	\$6.50	\$32.68	20%	\$28.09	23%
73590	RADIOLOGIC EXAMINATION; TIBIA & FIBULA, TWO VIEWS	\$6.50	\$30.17	22%	\$27.11	24%
73600	RADIOLOGIC EXAMINATION, ANKLE; TWO VIEWS	\$11.81	\$31.11	38%	\$25.85	46%
73620	RADIOLOGIC EXAMINATION, FOOT; TWO VIEWS	\$11.81	\$27.03	44%	\$23.41	50%
73706	CT ANGIOGRAPHY,LOW EXTREMITY,W/O CONTRAST MATERIAL	\$210.01	\$254.90	82%	\$315.41	67%
74018	X-RAY EXAM ABDOMEN 1 VIEW	\$12.95	\$28.65	45%	\$27.05	48%
74177	COMPUTED TOMOGRPHY,ABDOMEN & PELVIS; W/CONTRST	\$164.15	\$303.05	54%	\$312.09	53%
76536	ECHOGRAPHY,SOFT TISSUE HEAD-NECK,B-SCAN/REAL IMAG	\$34.33	\$106.42	32%	\$98.47	35%
76700	ECHOGRAPHY,ABDOMINAL,B-SCAN/REAL TIME IMAGE;COMPL	\$47.47	\$112.07	42%	\$114.70	41%
76705	ECHOGRAPHY,ABDOMINAL,B-SCAN/REAL TIME IMAGE;LIMIT	\$34.33	\$84.53	41%	\$85.83	40%
76770	ECHOGRAPHY,RETROPERITONEAL,B-SCAN/REAL IMAGE;COMP	\$47.47	\$104.36	45%	\$108.49	44%
76881	ULTRASND,EXTREMTY,NONVASCLR,REAL-TIME W/IMG;COMPL	\$57.58	\$52.67	109%	\$91.21	63%
Overall Average		\$50.58	\$76.63	66%	\$85.93	59%

Observations from the radiology services rate comparisons include:

- Utah Medicaid rates are an average of 66 percent of the Medicare rates for Utah. The highest rate is 139 percent of the Medicare rate, and the lowest rate is 20 percent of the Medicare rate.



MEDICAID REIMBURSEMENT RATE COMPARATIVE ANALYSIS – RADIOLOGY

- *Utah Medicaid rates are an average of 59 percent of the other state rates, with the highest rate at 91 percent, and the lowest rate at 23 percent.*

The accompanying exhibit (Microsoft Excel workbook titled “Radiology Services Exhibit A Utah Rate Study”) contains the complete list of the procedure codes in this comparison along with the Utah Medicaid rates, the Medicare rates, and the other state Medicaid rates for each code.