



August 17, 2026

SUBMITTED ELECTRONICALLY VIA REGULATIONS.GOV

Mehmet Oz, MD
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1850-P
P.O. Box 8010
Baltimore, MD 21244-8010

Re: Medicare Program; Hospital Outpatient Prospective Payment and Ambulatory Surgical Center Payment Systems for Calendar Year 2027; Nuclear Medicine APCs

Dear Administrator Oz:

The Cardiac PET Industry Coalition (CPIC) appreciates the opportunity to provide comments to the Centers for Medicare & Medicaid Services (CMS) on the 2027 OPPS/ASC proposed rule.¹ CPIC is an alliance of diagnostic medical equipment and supply manufacturers, medical imaging companies and other industry stakeholders committed to delivering optimal patient care and promoting policies that improve patient outcomes. CPIC members are dedicated to ensuring patient access to cardiac Positron Emission Tomography (PET). Cardiac PET is essential in the practice of modern cardiovascular medicine, not only in diagnosis, but also in the management of various cardiovascular disease states and the guidance of invasive procedures.

CPIC supports CMS' proposed refinements to the nuclear medicine APCs. For 2027, CMS proposes to reassign certain cardiac PET procedures from new technology APCs to a clinical APC. Specifically, CMS proposes reassigning the following CPT codes to APC 5594 Level 4 Nuclear Medicine and Related Services:

- 78431 Myocardial imaging, positron emission tomography (PET), perfusion study (including ventricular wall motion[s] and/or ejection fraction[s], when performed); multiple studies at rest and stress (exercise or pharmacologic), with concurrently acquired computed tomography transmission scan

¹Medicare Program: Hospital Outpatient Prospective Payment and Ambulatory Surgical Center Payment Systems, 91 Fed. Reg. 41734 (July 7, 2026).

- 78431 Myocardial imaging, positron emission tomography (PET), combined perfusion with metabolic evaluation study (including ventricular wall motion[s] and/or ejection fraction[s], when performed), dual radiotracer (eg, myocardial viability)
- 78433 Myocardial imaging, positron emission tomography (PET), combined perfusion with metabolic evaluation study (including ventricular wall motion[s] and/or ejection fraction[s], when performed), dual radiotracer (eg, myocardial viability); with concurrently acquired computed tomography transmission scan

These codes are clinically similar and require similar resource use and therefore, appropriately assigned to the same APC.

Again, CPIC supports and would urge CMS to finalize these refinements to the nuclear medicine APCs as proposed. Thank you for your attention to this issue.

Sincerely,

Lon Wilson

Lon Wilson
President
Cardiac PET Industry Coalition

600 Cranberry Woods Drive, Suite 300
Cranberry Twp. PA 16066