

TABLE D-B7: CY 2026 PFS ESTIMATED IMPACT ON TOTAL ALLOWED CHARGES BY SPECIALTY

(A) Specialty	(B) Total: Non-Facility/Facility	(C) Allowed Charges (mil)	(D) Impact of Work RVU Changes	(E) Impact of PE RVU Changes	(F) Impact of MP RVU Changes	(G) Combined Impact
ALLERGY/IMMUNOLOGY	<i>TOTAL</i>	\$213	0%	7%	0%	7%
	<i>Non-Facility</i>	\$205	0%	8%	0%	8%
	<i>Facility</i>	\$8	0%	-11%	0%	-11%
ANESTHESIOLOGY	<i>TOTAL</i>	\$1,602	0%	-1%	0%	-1%
	<i>Non-Facility</i>	\$311	0%	7%	0%	7%
	<i>Facility</i>	\$1,290	0%	-3%	0%	-3%
AUDIOLOGIST	<i>TOTAL</i>	\$75	0%	-1%	-1%	-1%
	<i>Non-Facility</i>	\$72	0%	0%	-1%	0%
	<i>Facility</i>	\$3	0%	-13%	-1%	-14%
CARDIAC SURGERY	<i>TOTAL</i>	\$151	-1%	-3%	0%	-3%
	<i>Non-Facility</i>	\$27	0%	7%	0%	6%
	<i>Facility</i>	\$124	-1%	-5%	0%	-5%
CARDIOLOGY	<i>TOTAL</i>	\$6,020	0%	1%	0%	1%
	<i>Non-Facility</i>	\$3,759	0%	6%	0%	5%
	<i>Facility</i>	\$2,261	-1%	-6%	0%	-7%
CHIROPRACTIC	<i>TOTAL</i>	\$631	-1%	-1%	0%	-2%
	<i>Non-Facility</i>	\$629	-1%	-1%	0%	-2%
	<i>Facility</i>	\$2	-1%	-15%	0%	-17%
CLINICAL PSYCHOLOGIST	<i>TOTAL</i>	\$733	3%	1%	-1%	3%
	<i>Non-Facility</i>	\$594	3%	3%	-1%	5%
	<i>Facility</i>	\$140	3%	-5%	-1%	-3%
CLINICAL SOCIAL WORKER	<i>TOTAL</i>	\$1,019	4%	2%	-1%	4%
	<i>Non-Facility</i>	\$879	4%	3%	-1%	6%
	<i>Facility</i>	\$141	4%	-5%	-1%	-2%
COLON AND RECTAL SURGERY	<i>TOTAL</i>	\$147	-1%	-2%	0%	-2%
	<i>Non-Facility</i>	\$53	0%	7%	0%	7%
	<i>Facility</i>	\$94	-1%	-7%	0%	-7%
CRITICAL CARE	<i>TOTAL</i>	\$338	0%	-5%	0%	-4%
	<i>Non-Facility</i>	\$55	0%	7%	0%	7%
	<i>Facility</i>	\$283	0%	-7%	0%	-7%
DERMATOLOGY	<i>TOTAL</i>	\$3,905	0%	-2%	0%	-2%
	<i>Non-Facility</i>	\$3,763	0%	-1%	0%	-1%

(A) Specialty	(B) Total: Non-Facility/Facility	(C) Allowed Charges (mil)	(D) Impact of Work RVU Changes	(E) Impact of PE RVU Changes	(F) Impact of MP RVU Changes	(G) Combined Impact
DIAGNOSTIC TESTING FACILITY	Facility	\$142	-1%	-13%	0%	-14%
	TOTAL	\$920	0%	2%	0%	0%
	Non-Facility	\$919	0%	2%	0%	0%
EMERGENCY MEDICINE	Facility	\$2	-1%	0%	1%	-1%
	TOTAL	\$2,422	0%	-3%	1%	-1%
	Non-Facility	\$221	0%	7%	0%	7%
ENDOCRINOLOGY	Facility	\$2,201	0%	-4%	1%	-2%
	TOTAL	\$528	0%	2%	0%	3%
	Non-Facility	\$426	0%	6%	0%	6%
FAMILY PRACTICE	Facility	\$102	0%	-11%	0%	-10%
	TOTAL	\$5,461	0%	3%	0%	3%
	Non-Facility	\$4,394	0%	6%	0%	6%
GASTROENTEROLOGY	Facility	\$1,067	0%	-9%	0%	-9%
	TOTAL	\$1,397	0%	-3%	0%	-4%
	Non-Facility	\$505	0%	6%	0%	6%
GENERAL PRACTICE	Facility	\$891	-1%	-9%	0%	-10%
	TOTAL	\$378	0%	3%	0%	3%
	Non-Facility	\$304	0%	5%	0%	6%
GENERAL SURGERY	Facility	\$74	0%	-8%	0%	-7%
	TOTAL	\$1,536	0%	-3%	0%	-3%
	Non-Facility	\$449	0%	6%	0%	6%
GERIATRICS	Facility	\$1,086	-1%	-7%	0%	-7%
	TOTAL	\$201	1%	1%	0%	1%
	Non-Facility	\$129	1%	8%	0%	8%
HAND SURGERY	Facility	\$72	0%	-10%	0%	-9%
	TOTAL	\$261	0%	0%	0%	-1%
	Non-Facility	\$142	0%	5%	0%	5%
HEMATOLOGY/ONCOLOGY	Facility	\$119	-1%	-7%	0%	-7%
	TOTAL	\$1,549	0%	0%	0%	0%
	Non-Facility	\$995	0%	6%	0%	6%
INDEPENDENT LABORATORY	Facility	\$555	0%	-11%	0%	-11%
	TOTAL	\$551	0%	-1%	0%	-1%
	Non-Facility	\$537	0%	-1%	0%	-1%
INFECTIOUS DISEASE	Facility	\$14	-1%	-1%	0%	-3%
	TOTAL	\$541	0%	-7%	0%	-6%
	Non-Facility	\$86	0%	7%	0%	7%
INTERNAL MEDICINE	Facility	\$455	0%	-10%	0%	-9%
	TOTAL	\$9,446	0%	-2%	0%	-1%
	Non-Facility	\$4,686	0%	6%	0%	6%
INTERVENTIONAL PAIN MGMT	Facility	\$4,760	0%	-9%	0%	-8%
	TOTAL	\$829	0%	3%	0%	3%
	Non-Facility	\$647	0%	7%	0%	6%
INTERVENTIONAL RADIOLOGY	Facility	\$182	-1%	-8%	0%	-9%
	TOTAL	\$440	-1%	3%	0%	2%
	Non-Facility	\$260	0%	9%	0%	7%
MULTISPECIALTY CLINIC/OTHER PHYS	Facility	\$180	-2%	-5%	0%	-7%
	TOTAL	\$157	0%	-2%	0%	-2%
	Non-Facility	\$78	0%	5%	0%	5%
NEPHROLOGY	Facility	\$78	0%	-9%	0%	-9%
	TOTAL	\$1,633	0%	0%	0%	1%
	Non-Facility	\$976	1%	6%	0%	7%
NEUROLOGY	Facility	\$657	0%	-9%	0%	-9%
	TOTAL	\$1,319	0%	1%	0%	1%
	Non-Facility	\$836	0%	6%	0%	6%
NEUROSURGERY	Facility	\$483	0%	-9%	0%	-9%
	TOTAL	\$687	-1%	-5%	0%	-5%
	Non-Facility	\$116	0%	5%	0%	6%
NUCLEAR MEDICINE	Facility	\$571	-1%	-7%	0%	-7%
	TOTAL	\$48	-1%	0%	0%	-1%

(A) Specialty	(B) Total: Non-Facility/Facility	(C) Allowed Charges (mil)	(D) Impact of Work RVU Changes	(E) Impact of PE RVU Changes	(F) Impact of MP RVU Changes	(G) Combined Impact
	Non-Facility	\$21	0%	1%	0%	1%
	Facility	\$27	-1%	-1%	0%	-3%
	TOTAL	\$1,064	0%	-2%	0%	-1%
NURSE ANES / ANES ASST	Non-Facility	\$20	0%	9%	0%	10%
	Facility	\$1,044	0%	-2%	0%	-1%
	TOTAL	\$7,750	0%	0%	0%	1%
NURSE PRACTITIONER	Non-Facility	\$5,104	0%	5%	0%	5%
	Facility	\$2,647	0%	-9%	0%	-9%
	TOTAL	\$543	0%	-1%	0%	-1%
OBSTETRICS/GYNECOLOGY	Non-Facility	\$371	0%	4%	0%	4%
	Facility	\$172	-1%	-10%	1%	-10%
	TOTAL	\$4,457	0%	-1%	0%	-2%
OPHTHALMOLOGY	Non-Facility	\$3,153	0%	3%	0%	3%
	Facility	\$1,304	-1%	-12%	0%	-13%
	TOTAL	\$1,365	0%	2%	0%	2%
OPTOMETRY	Non-Facility	\$1,301	0%	3%	0%	3%
	Facility	\$64	0%	-13%	0%	-13%
	TOTAL	\$45	0%	0%	0%	0%
ORAL/MAXILLOFACIAL SURGERY	Non-Facility	\$34	0%	4%	0%	4%
	Facility	\$11	-1%	-10%	0%	-11%
	TOTAL	\$3,283	0%	-3%	0%	-3%
ORTHOPEDIC SURGERY	Non-Facility	\$1,450	0%	5%	0%	5%
	Facility	\$1,833	-1%	-9%	0%	-9%
	TOTAL	\$55	0%	-1%	0%	0%
OTHER	Non-Facility	\$43	0%	1%	0%	3%
	Facility	\$11	0%	-9%	0%	-9%
	TOTAL	\$1,129	0%	1%	0%	0%
OTOLARNGOLOGY	Non-Facility	\$895	0%	3%	0%	3%
	Facility	\$233	-1%	-11%	0%	-12%
	TOTAL	\$1,178	-1%	-2%	0%	-2%
PATHOLOGY	Non-Facility	\$624	-1%	-1%	0%	-2%
	Facility	\$554	-1%	-2%	0%	-3%
	TOTAL	\$54	0%	1%	0%	2%
PEDIATRICS	Non-Facility	\$35	0%	5%	0%	7%
	Facility	\$19	0%	-8%	0%	-7%
	TOTAL	\$1,142	0%	-2%	0%	-2%
PHYSICAL MEDICINE	Non-Facility	\$543	0%	6%	0%	6%
	Facility	\$600	0%	-9%	0%	-9%
	TOTAL	\$6,205	0%	-1%	0%	-1%
PHYSICAL/OCCUPATIONAL THERAPY	Non-Facility	\$6,205	0%	-1%	0%	-1%
	Facility	\$	-1%	-6%	-1%	-7%
	TOTAL	\$3,938	0%	0%	0%	1%
PHYSICIAN ASSISTANT	Non-Facility	\$2,720	0%	4%	0%	4%
	Facility	\$1,218	0%	-8%	0%	-8%
	TOTAL	\$290	-1%	-4%	0%	-4%
PLASTIC SURGERY	Non-Facility	\$128	0%	3%	0%	4%
	Facility	\$161	-1%	-9%	0%	-10%
	TOTAL	\$1,875	0%	1%	0%	2%
PODIATRY	Non-Facility	\$1,663	0%	3%	0%	3%
	Facility	\$211	0%	-8%	0%	-9%
	TOTAL	\$80	0%	-1%	0%	-1%
PORTABLE X-RAY SUPPLIER	Non-Facility	\$77	0%	-1%	0%	-1%
	Facility	\$3	-1%	-1%	0%	-2%
	TOTAL	\$835	1%	0%	0%	0%
PSYCHIATRY	Non-Facility	\$505	1%	6%	0%	6%
	Facility	\$330	1%	-9%	0%	-9%
	TOTAL	\$1,233	0%	-2%	0%	-1%
PULMONARY DISEASE	Non-Facility	\$538	0%	7%	0%	7%
	Facility	\$695	0%	-8%	0%	-8%

(A) Specialty	(B) Total: Non-Facility/Facility	(C) Allowed Charges (mil)	(D) Impact of Work RVU Changes	(E) Impact of PE RVU Changes	(F) Impact of MP RVU Changes	(G) Combined Impact
RADIATION ONCOLOGY AND RADIATION THERAPY CENTERS	<i>TOTAL</i>	\$1,507	-1%	-1%	0%	-1%
	<i>Non-Facility</i>	\$1,009	0%	-1%	0%	-1%
	<i>Facility</i>	\$498	-1%	-1%	0%	-2%
RADIOLOGY	<i>TOTAL</i>	\$4,515	-1%	-1%	0%	-2%
	<i>Non-Facility</i>	\$1,972	0%	0%	0%	1%
	<i>Facility</i>	\$2,543	-2%	-2%	0%	-3%
RHEUMATOLOGY	<i>TOTAL</i>	\$525	0%	4%	0%	4%
	<i>Non-Facility</i>	\$470	0%	6%	0%	6%
	<i>Facility</i>	\$55	0%	-12%	0%	-12%
THORACIC SURGERY	<i>TOTAL</i>	\$290	-1%	-2%	0%	-3%
	<i>Non-Facility</i>	\$55	0%	9%	0%	8%
	<i>Facility</i>	\$235	-1%	-5%	0%	-5%
UROLOGY	<i>TOTAL</i>	\$1,605	0%	0%	0%	0%
	<i>Non-Facility</i>	\$1,127	0%	5%	0%	5%
	<i>Facility</i>	\$479	-1%	-9%	0%	-10%
VASCULAR SURGERY	<i>TOTAL</i>	\$934	0%	6%	0%	5%
	<i>Non-Facility</i>	\$659	0%	11%	0%	9%
	<i>Facility</i>	\$275	-1%	-7%	0%	-6%
TOTAL	<i>TOTAL</i>	\$91,035	0%	0%	0%	0%
	<i>Non-Facility</i>	\$57,776	0%	4%	0%	4%
	<i>Facility</i>	\$33,259	0%	-7%	0%	-7%

* Column G may not equal the sum of columns D, E, and F due to rounding.

2. CY 2026 PFS Impact Discussion

a. Changes in RVUs

The most widespread specialty-level impacts of the RVU changes are generally related to the changes to RVUs for specific services resulting from the misvalued code initiative, including RVUs for new and revised codes. The estimated impacts for most specialties in the office-based setting, including surgical specialties, primary care specialties, behavioral health specialties, and those who furnish highly technical services outside of the hospital setting reflect significant increases relative to most of those same specialties in the facility setting. These increases can largely be attributed to, the proposed adjustment to indirect PE allocation in the facility setting. To a lesser degree, projected increases for some specialties, especially in primary care and behavioral health are driven by the redistributive effects of the proposed efficiency adjustment to work RVUs and the third year of the behavioral health work update. Increases are also due to proposed increases in valuation for particular services after considering the recommendations from the American Medical Association's (AMA) Relative Value Scale Update Committee (RUC) and CMS review, and increased payments resulting from supply and equipment pricing updates. For independent laboratories, it is important

to note that these entities receive approximately 83 percent of their Medicare revenues from services that are paid under the Clinical Lab Fee Schedule. Therefore, the estimated 1 percent increase for CY 2026 is only applicable to approximately 17 percent of the Medicare payment to these entities.

The estimated impacts for specialties in the hospital-based setting are driven primarily by the proposed adjustment to indirect PE allocation in the facility setting and the proposed efficiency adjustment. These decreases are also due to the revaluation of individual procedures based on reviews, including consideration of AMA RUC review and recommendations, as well as decreases resulting from the continued phase-in implementation of the previously finalized supply and equipment pricing updates. The estimated impacts also reflect decreased payments due to continued implementation of previously finalized code-level reductions that are being phased in over several years.

We note that several specialties appear on the specialty impacts table with both the largest projected increases in payment as well as the largest projected decreases in payment, split across the site of service differential.

We often receive comments regarding the changes in RVUs displayed on the specialty impact table (Table D–B7), including comments received in

response to the valuations. We remind interested parties that although the estimated impacts are displayed at the specialty level, typically, the changes are driven by the valuation of a relatively small number of new and/or potentially misvalued codes. The percentage changes in Table D–B7 are based upon aggregate estimated PFS allowed charges summed across all services furnished by physicians, practitioners, and suppliers within a specialty to arrive at the total allowed charges for the specialty and compared to the same summed total from the previous calendar year. Therefore, they are averages and may not necessarily represent what is happening to the particular services furnished by a single practitioner within any given specialty.

As previously discussed, we have reviewed our suite of public use files and have worked on new ways to offer interested parties' additional information that addresses concerns about the lack of granularity in our impact tables. To illustrate how impacts can vary within specialties, we created a public use file that models the expected percentage change in total RVUs per practitioner. Using CY 2024 utilization data, Total RVUs change between -2 percent and 2 percent for roughly 25 percent of practitioners, representing approximately 32 percent of the changes in Total RVUs for all practitioners, with variation by