

CMS Estimated Impact of Proposed New G Codes in CY2025 NPRM

CPT/HCPCS	DESCRIPTION	CY2025 Work RVU	NPRM Medicare Utilization	CMS Est CY2025 Aggregate Work Payment W/O Legislation	CMS Est CY2025 Total Allowed Charges W/O Legislation
GCDRA	ASCVD risk assessment, 5-15 min	0.18	38,447	\$ 223,918	\$ 705,751
GCDRM	ASCVD risk management services	0.18	62,854	\$ 366,069	\$ 973,520
GCTB1	Ind Behavior Mgt/Mod Caregiver Training - Initial 30 min	1.00	64,113	\$ 2,074,468	\$ 3,339,160
GCTB2	Ind Behavior Mgt/Mod Caregiver Training - Each Addn 15 min	0.54	23,621	\$ 412,711	\$ 603,722
GCTD1	Direct care caregiver training - No pt present, initial 30 min	1.00	64,113	\$ 2,074,468	\$ 3,339,160
GCTD2	Direct care caregiver training - No pt present, each addn 15 min	0.54	23,621	\$ 412,711	\$ 603,722
GCTD3	Direct care caregiver training - group training	0.23	23,621	\$ 175,784	\$ 519,287
GFCI1	Post d/c telephone follow-up, 4 pr mnth	1.00	102,334	\$ 3,311,152	\$ 6,350,747
GIDXX	Visit Complexity Inpatient/Obs E/M Add-on - Infectious Disease	0.89	7,905	\$ 227,648	\$ 340,194
GIPC1	Interprof Consult - Mental Health 5-10 min	0.35	513	\$ 5,810	\$ 8,798
GIPC2	Interprof Consult - Mental Health 11-20 min	0.70	776	\$ 17,580	\$ 26,872
GIPC3	Interprof Consult - Mental Health 21-30 min	1.05	674	\$ 22,890	\$ 35,317
GIPC4	Interprof Consult - Mental Health 31 or more min	1.40	469	\$ 21,247	\$ 32,933
GIPC5	Interprof Health Record Referral by consultant - 5 or more min	0.70	5,225	\$ 118,351	\$ 169,073
GIPC6	Interprof Health Record Referral by treating phys- 30 min	0.70	1,664	\$ 37,692	\$ 56,538
GMBT1	Supply of digital mental health treatment device	0.00	-	\$ -	\$ -
GMBT2	First 20 min monthly treatment mgt - DMHT Device	0.62	14,265	\$ 286,177	\$ 736,017

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GMBT3	Each addn 20 min monthly treatment mgt - DMHT Device	0.61	5,483	\$ 108,227	\$ 217,483
GMEM1	Replacement pt electronic sys	0.00	-	\$ -	\$ -
GPCM1	APCM for patients with up to one chronic condition	0.17	230,348	\$ 1,267,041	\$ 2,294,688
GPCM2	APCM for patients with multiple (two or more) chronic conditions	0.77	1,024,218	\$ 25,517,657	\$ 49,898,078
GPCM3	APCM for QMBs enrollees with multiple chronic conditions	1.67	314,311	\$ 16,983,764	\$ 33,544,759
GPOC1	Post-op visit complexity E/M Add-On w/o formal transfer of care	0.16	36,457	\$ 188,736	\$ 318,491
GSPI1	Safety planning interventions add-on	1.09	15,614	\$ 550,694	\$ 644,864
			CMS Total Estimated Impact:	\$ 54,404,795	\$ 104,759,174

CMS Estimated Impact for Advanced Primary Care Management (APCM) Services (HCPSC codes GPCM1, GPCM2, and GPCM3)

CPT/ HCPSC	DESCRIPTION	CMS Previous Utilization	CMS NPRM Utilization	Ratio	NPRM Work RVU	CMS Est. Change in Physician Work Payment	CMS Est. Change in Total Allowed Charges
GPCM1	APCM for patients with up to one chronic condition	-	230,348	N/A	0.17	\$ 1,267,041	\$ 2,294,688
GPCM2	APCM for patients with multiple (two or more) chronic conditions	-	1,024,218	N/A	0.77	\$ 25,517,657	\$ 49,898,078
GPCM3	APCM for QMBs enrollees with multiple chronic conditions	-	314,311	N/A	1.67	\$ 16,983,764	\$ 33,544,759
98970	Qnhp ol dig assmt&mgmt 5-10	1,102	987	0.896	0.25	\$ (923)	\$ (1,292)
98971	Qnhp ol dig assmt&mgmt 11-20	740	663	0.896	0.44	\$ (1,091)	\$ (678)
98972	Qnhp ol dig assmt&mgmt 21+	897	804	0.896	0.69	\$ (2,073)	\$ (681)
99421	Ol dig e/m svc 5-10 min	71,385	63,961	0.896	0.25	\$ (59,765)	\$ (104,614)
99422	Ol dig e/m svc 11-20 min	39,597	35,479	0.896	0.50	\$ (66,302)	\$ (111,915)
99423	Ol dig e/m svc 21+ min	38,955	34,904	0.896	0.80	\$ (104,365)	\$ (192,909)
99424	Prin care mgmt phys 1st 30	46,346	41,526	0.896	1.45	\$ (225,050)	\$ (339,115)
99425	Prin care mgmt phys ea addl	9,858	8,636	0.876	1.00	\$ (39,392)	\$ (65,195)
99426	Prin care mgmt staff 1st 30	182,740	163,735	0.896	1.00	\$ (611,969)	\$ (873,490)
99427	Prin care mgmt staff ea addl	62,854	54,432	0.866	0.71	\$ (192,766)	\$ (139,510)
99437	Chrn care mgmt phys ea addl	13,329	11,850	0.889	1.00	\$ (47,657)	\$ (88,484)

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99439	Chrn care mgmt staf ea addl	1,812,427	1,585,874	0.875	0.70	\$ (5,110,732)	\$ (11,418,612)
99452	Ntrprof ph1/ntrnet/ehr rfri	20,803	18,639	0.896	0.70	\$ (48,766)	\$ (52,269)
99487	Cplx chrnc care 1st 60 min	411,603	368,796	0.896	1.81	\$ (2,494,892)	\$ (4,884,242)
99489	Cplx chrnc care ea addl 30	784,850	658,489	0.839	1.00	\$ (4,075,841)	\$ (8,548,501)
99490	Chrn care mgmt staff 1st 20	5,007,519	4,486,737	0.896	1.00	\$ (16,769,404)	\$ (32,747,187)
99491	Chrn care mgmt phys 1st 30	193,760	173,609	0.896	1.50	\$ (973,308)	\$ (1,633,206)
G2250	Remot img sub by pt, non e/m	1,131	1,014	0.896	0.18	\$ (682)	\$ (1,401)
G2251	Brief chkin, 5-10, non-e/m	188	169	0.896	0.25	\$ (157)	\$ (1,047)
G2252	Brief chkin by md/qhp, 11-20	4,034	3,614	0.896	0.50	\$ (6,754)	\$ (10,208)
					Total CMS Estimated Impact:	\$ 12,936,573	\$ 24,522,968

CMS Estimated Impact of Proposed Change to Surgical Global Transfer of Care Modifiers

CPT/ HCPCS	DESCRIPTION	CY2025 Work RVUs	NPRM Util	CMS Adjustment to Aggregate Allowed Charges due to New Proposal	CMS 090-day Surgical Estimated Work Payment Reduction Due to Mod 54-56	090-day Surgical Allowed Charges Reduction Due to Mod 54-56
13160	Sec clsr surg wnd/dehsn xtn	12.04	13,390	96%	\$ (206,048)	\$ (379,148)
14020	Tis trnfr s/a/l 10 sq cm/<	7.22	13,932	96%	\$ (128,567)	\$ (364,204)
14021	Tis trnfr s/a/l 10.1-30 sqcm	9.72	16,665	96%	\$ (207,026)	\$ (537,869)
14040	Tis trnfr f/c/c/m/n/a/g/h/f	8.60	51,080	96%	\$ (561,454)	\$ (1,426,220)
14041	Tis trnfr f/c/c/m/n/a/g/h/f	10.83	39,826	96%	\$ (551,261)	\$ (1,372,677)
14060	Tis trnfr e/n/e/l 10 sq cm/<	9.23	71,503	96%	\$ (843,511)	\$ (2,050,077)
14061	Tis trnfr e/n/e/l10.1-30sqcm	11.48	27,344	96%	\$ (401,209)	\$ (1,009,545)
14301	Tis trnfr any 30.1-60 sq cm	12.65	41,299	96%	\$ (667,725)	\$ (1,516,698)
15100	Skin splt grft trnk/arm/leg	9.90	8,496	96%	\$ (107,507)	\$ (238,419)
15120	Skn splt a-grft fac/nck/hf/g	10.15	5,930	96%	\$ (76,923)	\$ (165,434)
15240	Fth gr fr f/c/c/m/n/ax/g/h/f	10.41	10,549	96%	\$ (140,357)	\$ (358,895)
15260	Fth grf fr n/e/e/l 20 sqcm/<	11.64	46,273	96%	\$ (688,408)	\$ (1,715,924)
15730	Mdfc flap w/prsrv vasc pedcl	13.50	1,529	96%	\$ (26,388)	\$ (59,074)
15731	Forehead flap w/vasc pedicle	14.38	1,896	96%	\$ (34,854)	\$ (74,642)
15734	Muscle-skin graft trunk	23.00	24,403	96%	\$ (717,370)	\$ (1,411,722)
15823	Revision of upper eyelid	6.81	42,234	96%	\$ (367,600)	\$ (899,155)
19120	Removal of breast lesion	5.92	5,043	96%	\$ (38,156)	\$ (84,332)
19125	Excision breast lesion	6.69	9,175	96%	\$ (78,453)	\$ (165,920)
19301	Partial mastectomy	10.13	56,289	96%	\$ (728,781)	\$ (1,436,732)
19303	Mast simple complete	15.00	18,914	96%	\$ (362,605)	\$ (701,168)
19307	Mast mod rad	17.99	3,577	96%	\$ (82,245)	\$ (163,002)
19357	Tiss xpndr plmt brst rcnstj	14.84	4,012	96%	\$ (76,093)	\$ (180,342)

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20680	Removal of implant deep	5.96	44,830	96%	\$ (379,017)	\$ (833,189)
22551	Arthr ant ntrbdy cervical	25.00	44,588	96%	\$ (1,581,236)	\$ (3,271,947)
22558	Arthr ant ntrbd min dsc lum	23.53	33,938	96%	\$ (1,132,791)	\$ (2,232,782)
22600	Arthr pst tq 1ntrspc crv	17.40	20,224	96%	\$ (499,181)	\$ (1,148,404)
22612	Arthr pst tq 1ntrspc lumbar	23.53	59,708	96%	\$ (1,992,931)	\$ (4,070,280)
22630	Arthr pst tq 1ntrspc lum	22.09	5,920	96%	\$ (185,506)	\$ (400,195)
22633	Arthr cmbn 1ntrspc lumbar	26.80	50,437	96%	\$ (1,917,469)	\$ (3,941,105)
22830	Exploration of spinal fusion	11.22	8,143	96%	\$ (129,598)	\$ (291,735)
23120	Partial removal collar bone	7.39	4,705	96%	\$ (49,327)	\$ (121,019)
23412	Repair rotator cuff chronic	11.93	8,345	96%	\$ (141,223)	\$ (308,063)
23430	Repair biceps tendon	10.17	28,875	96%	\$ (416,566)	\$ (933,757)
23472	Reconstruct shoulder joint	22.13	112,958	96%	\$ (3,546,012)	\$ (7,009,499)
23615	Optx prox humrl fx w/int fix	12.30	7,121	96%	\$ (124,244)	\$ (273,060)
25607	Treat fx rad extra-articul	9.56	8,097	96%	\$ (109,806)	\$ (262,614)
25609	Treat fx radial 3+ frag	14.38	21,017	96%	\$ (428,719)	\$ (962,069)
26055	Incise finger tendon sheath	3.11	91,072	96%	\$ (401,779)	\$ (1,329,350)
26160	Remove tendon sheath lesion	3.57	15,068	96%	\$ (76,307)	\$ (239,532)
27125	Partial hip replacement	16.64	4,868	96%	\$ (114,910)	\$ (237,900)
27130	Total hip arthroplasty	19.60	267,224	96%	\$ (7,429,720)	\$ (14,750,291)
27132	Total hip arthroplasty	25.69	8,013	96%	\$ (292,022)	\$ (575,518)
27134	Revise hip joint replacement	30.28	13,100	96%	\$ (562,668)	\$ (1,068,798)
27235	Treat thigh fracture	13.00	9,242	96%	\$ (170,428)	\$ (362,634)

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27236	Treat thigh fracture	17.61	65,196	96%	\$ (1,628,622)	\$ (3,357,026)
27244	Treat thigh fracture	18.18	3,624	96%	\$ (93,453)	\$ (191,894)
27245	Treat thigh fracture	18.18	83,550	96%	\$ (2,154,683)	\$ (4,420,520)
27446	Revision of knee joint	17.13	18,347	96%	\$ (445,834)	\$ (906,804)
27447	Total knee arthroplasty	19.60	476,980	96%	\$ (13,261,641)	\$ (26,273,276)
27486	Revise/replace knee joint	21.12	14,170	96%	\$ (424,521)	\$ (857,367)
27487	Revise/replace knee joint	27.11	23,263	96%	\$ (894,617)	\$ (1,750,006)
27506	Treatment of thigh fracture	19.65	9,567	96%	\$ (266,677)	\$ (552,378)
27590	Amputate leg at thigh	13.47	8,136	96%	\$ (155,465)	\$ (270,458)
27814	Treatment of ankle fracture	10.62	9,002	96%	\$ (135,621)	\$ (297,712)
27880	Amputation of lower leg	15.37	9,848	96%	\$ (214,722)	\$ (376,217)
28122	Partial removal of foot bone	6.76	12,386	96%	\$ (118,770)	\$ (238,184)
28124	Partial removal of toe	5.00	7,257	96%	\$ (51,469)	\$ (120,218)
28232	Incision of toe tendon	3.51	14,419	96%	\$ (71,791)	\$ (203,239)
28270	Release of foot contracture	4.93	13,115	96%	\$ (91,722)	\$ (218,300)
28285	Repair of hammertoe	5.62	48,207	96%	\$ (384,313)	\$ (833,751)
28296	Cor hlx vlgs dstl mtar osteo	8.25	5,382	96%	\$ (62,981)	\$ (122,661)
28308	Incision of metatarsal	5.48	16,858	96%	\$ (131,051)	\$ (287,872)
28810	Amputation toe & metatarsal	6.64	11,615	96%	\$ (109,399)	\$ (209,200)
29822	Sho arthrs srg lmted dbrdmt	7.03	7,718	96%	\$ (76,968)	\$ (182,367)
29823	Sho arthrs srg xtensv dbrdmt	7.98	50,354	96%	\$ (570,010)	\$ (1,298,308)
29824	Sho arthrs srg dstl clavicle	8.98	37,004	96%	\$ (471,379)	\$ (1,090,706)
29827	Sho arthrs srg rt8tr cuff rpr	15.59	84,020	96%	\$ (1,858,098)	\$ (3,872,717)
29828	Sho arthrs srg bicp tenodesis	13.16	28,162	96%	\$ (525,728)	\$ (1,114,311)
29848	Wrist endoscopy/surgery	6.39	35,179	96%	\$ (318,880)	\$ (786,026)

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29876	Knee arthroscopy/surgery	8.87	5,203	96%	\$ (65,469)	\$ (147,353)
29879	Knee arthroscopy/surgery	8.99	4,267	96%	\$ (54,418)	\$ (122,790)
29880	Knee arthroscopy/surgery	7.39	25,497	96%	\$ (267,283)	\$ (623,915)
29881	Knee arthroscopy/surgery	7.03	33,860	96%	\$ (337,664)	\$ (799,197)
30520	Repair of nasal septum	7.01	17,376	97%	\$ (113,532)	\$ (293,078)
32480	Partial removal of lung	25.82	2,868	97%	\$ (69,019)	\$ (117,455)
32663	Thoracoscopy w/lobectomy	24.64	11,041	99%	\$ (124,983)	\$ (210,401)
33207	Insert heart pm ventricular	7.80	8,164	99%	\$ (29,255)	\$ (53,170)
33208	Insrt heart pm atrial & vent	8.52	80,230	99%	\$ (314,039)	\$ (564,493)
33228	Remv&replc pm gen dual lead	5.52	27,884	99%	\$ (70,713)	\$ (134,517)
33249	Insj/rplcmt defib w/lead(s)	14.92	25,808	99%	\$ (176,904)	\$ (319,661)
33263	Rmvl & rplcmt dfb gen 2 lead	6.08	4,433	99%	\$ (12,382)	\$ (23,358)
33264	Rmvl & rplcmt dfb gen mlt ld	6.35	11,125	99%	\$ (32,454)	\$ (61,125)
33405	Replacement aortic valve opn	41.32	17,280	99%	\$ (328,033)	\$ (532,140)
33426	Repair of mitral valve	43.28	2,903	99%	\$ (57,728)	\$ (93,874)
33430	Replacement of mitral valve	50.93	8,701	99%	\$ (203,586)	\$ (330,662)
33533	Cabg arterial single	33.75	64,315	98%	\$ (1,287,381)	\$ (2,112,036)
34705	Evac rpr a-biiliac ndgft	29.58	11,904	99%	\$ (161,773)	\$ (244,245)
34706	Evasc rpr a-biiliac rpt	45.00	582	99%	\$ (12,038)	\$ (17,824)
34710	Dlyd plmt xtn prosth 1st vsl	15.00	1,015	99%	\$ (6,996)	\$ (10,896)
35301	Rechanneling of artery	21.16	26,924	99%	\$ (261,734)	\$ (409,611)
36819	Av fuse uppr arm basilic	13.29	3,953	99%	\$ (24,133)	\$ (38,795)
36821	Av fusion direct any site	11.90	21,361	99%	\$ (116,781)	\$ (188,625)

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36830	Artery-vein nonautograft	12.03	11,804	99%	\$ (65,240)	\$ (106,172)
36832	Av fistula revision open	13.50	13,518	99%	\$ (83,841)	\$ (135,884)
37607	Ligation of a-v fistula	6.25	6,269	99%	\$ (18,000)	\$ (30,841)
38525	Biopsy/removal lymph nodes	6.43	44,339	97%	\$ (304,953)	\$ (636,146)
38724	Removal of lymph nodes neck	23.95	8,471	97%	\$ (217,007)	\$ (396,139)
43281	Lap paraesophag hern repair	26.60	14,911	98%	\$ (261,904)	\$ (454,065)
43644	Lap gastric bypass/roux-en- y	29.40	3,373	98%	\$ (65,486)	\$ (116,671)
44005	Freeing of bowel adhesion	18.46	6,835	98%	\$ (83,311)	\$ (148,753)
44120	Removal of small intestine	20.82	19,517	98%	\$ (268,319)	\$ (474,649)
44140	Partial removal of colon	22.59	8,548	98%	\$ (127,504)	\$ (228,028)
44143	Partial removal of colon	27.79	8,380	98%	\$ (153,778)	\$ (273,912)
44145	Partial removal of colon	28.58	3,770	98%	\$ (71,150)	\$ (122,957)
44160	Removal of colon	20.89	9,968	98%	\$ (137,496)	\$ (246,032)
44204	Laparo partial colectomy	26.42	9,912	98%	\$ (172,921)	\$ (300,943)
44205	Lap colectomy part w/ileum	22.95	12,129	98%	\$ (183,817)	\$ (319,657)
44207	L colectomy/coloproctostomy	31.92	10,874	98%	\$ (229,201)	\$ (387,603)
44970	Laparoscopy appendectomy	9.45	19,877	98%	\$ (124,032)	\$ (239,928)
46930	Destroy internal hemorrhoids	1.61	4,492	98%	\$ (4,776)	\$ (19,840)
47562	Laparoscopic cholecystectomy	10.47	77,641	98%	\$ (536,781)	\$ (1,026,953)
47563	Laparo cholecystectomy/graph	11.47	35,502	98%	\$ (268,896)	\$ (510,913)

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47600	Removal of gallbladder	17.48	5,321	98%	\$ (61,423)	\$ (113,935)
49505	Prp i/hern init reduc >5 yr	7.96	35,143	98%	\$ (184,720)	\$ (369,417)
49507	Prp i/hern init block >5 yr	9.09	8,622	98%	\$ (51,753)	\$ (101,703)
49650	Lap ing hernia repair init	6.36	64,115	98%	\$ (269,262)	\$ (559,260)
50360	Transplantation of kidney	39.88	11,724	98%	\$ (277,296)	\$ (512,594)
50590	Fragmenting of kidney stone	9.77	35,314	98%	\$ (204,627)	\$ (365,533)
52601	Prostatectomy (turp)	13.16	35,387	98%	\$ (276,196)	\$ (462,047)
52648	Laser surgery of prostate	12.15	12,621	98%	\$ (90,950)	\$ (161,302)
53850	Prostatic microwave thermotx	5.42	654	98%	\$ (2,102)	\$ (16,068)
55866	Laps surg prst8ect rpbic rad	22.46	21,803	98%	\$ (290,430)	\$ (466,347)
57240	Anterior colporrhaphy	10.08	7,399	97%	\$ (69,517)	\$ (128,093)
57288	Repair bladder defect	12.13	21,704	97%	\$ (245,386)	\$ (455,848)
58571	Tlh w/t/o 250 g or less	15.00	26,672	97%	\$ (372,899)	\$ (681,610)
58575	Laps tot hyst resj mal	32.60	1,289	97%	\$ (39,179)	\$ (70,149)
60240	Removal of thyroid	15.04	5,873	98%	\$ (52,391)	\$ (96,266)
60500	Explore parathyroid glands	15.60	19,135	98%	\$ (177,043)	\$ (332,261)
61312	Open skull for drainage	30.17	8,912	97%	\$ (232,224)	\$ (487,178)
61510	Removal of brain lesion	30.83	8,298	97%	\$ (220,963)	\$ (483,926)
63030	Low back disk surgery	12.00	22,192	97%	\$ (230,011)	\$ (537,951)
63042	Laminotomy single lumbar	18.76	6,923	97%	\$ (112,175)	\$ (236,018)
63045	Lam facetec & foramot crv	17.95	14,681	97%	\$ (227,612)	\$ (499,676)
63047	Lam facetec & foramot lumbar	15.37	114,410	97%	\$ (1,518,831)	\$ (3,345,409)
63056	Decompress spinal cord lmbr	21.86	5,708	97%	\$ (107,765)	\$ (223,610)

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63081	Remove vert body dcmprn crvl	26.10	4,778	97%	\$ (107,721)	\$ (221,840)
64581	Opn impltj nea sacral nerve	12.20	4,791	97%	\$ (50,480)	\$ (81,542)
64718	Revise ulnar nerve at elbow	7.26	24,079	97%	\$ (150,987)	\$ (386,265)
64721	Carpal tunnel surgery	4.97	95,116	97%	\$ (408,304)	\$ (1,112,341)
65756	Corneal trnspl endothelial	16.84	12,356	96%	\$ (280,525)	\$ (581,950)
66170	Glaucoma surgery	13.94	4,669	96%	\$ (87,755)	\$ (202,875)
66179	Aqueous shunt eye w/o graft	14.00	535	96%	\$ (10,093)	\$ (22,979)
66180	Aqueous shunt eye w/graft	15.00	8,465	96%	\$ (171,190)	\$ (382,976)
66711	Ecp ciliary body destruction	5.62	536	96%	\$ (4,059)	\$ (10,496)
67036	Removal of inner eye fluid	12.13	18,844	96%	\$ (308,161)	\$ (667,910)
67040	Laser treatment of retina	14.50	5,623	96%	\$ (109,916)	\$ (230,499)
67041	Vit for macular pucker	16.33	10,422	96%	\$ (229,442)	\$ (470,906)
67042	Vit for macular hole	16.33	22,819	96%	\$ (502,381)	\$ (1,032,964)
67108	Repair detached retina	17.13	15,997	96%	\$ (369,447)	\$ (753,656)
67113	Repair retinal detach cplx	19.00	10,171	96%	\$ (260,528)	\$ (534,687)
67210	Treatment of retinal lesion	6.36	30,036	96%	\$ (257,545)	\$ (613,356)
67255	Reinforce/graft eye wall	8.38	492	96%	\$ (5,564)	\$ (13,459)
67900	Repair brow defect	6.82	9,447	96%	\$ (86,865)	\$ (197,282)
67904	Repair eyelid defect	7.97	22,933	96%	\$ (246,409)	\$ (564,422)
67917	Repair eyelid defect	5.93	13,123	96%	\$ (104,916)	\$ (252,359)
67924	Repair eyelid defect	5.93	6,800	96%	\$ (54,361)	\$ (133,061)
				CMS Total Estimated Impact:	\$ (69,920,534)	\$ (143,565,791)