Calendar Year 2025 Medicaid FFS Comparative Analysis Report

Purpose: CMS published, "Ensuring Access to Medicaid Services (CMS-2442-F)" (Access Final Rule, CMS 2442-F), effective July 9, 2024. The fee-for-service (FFS) payment provision for CFR 447.203(b)(2)- 447.203(b)(5), contains the following: Requires states to compare their FFS payment rates for primary care, obstetrical and gynecological care, and outpatient mental health and substance use disorder services to Medicare rates, and publish the analysis every two years.

Evaluation and Management Code	Evaluation and Management Code Description	Service Category	Population Group	Provider Type	Geographical Location	Calendar Year 2025 Base Medicaid Fee-For-Service Fee Schedule Payment Rate	Calendar year 2025 Medicare Non-Facility Payment Rates	Comparison of Medicaid to Medicare Payment Rates	Number of Medicaid Paid Claims	Number of Medicaid Beneficiaries
99202	Office o/p new sf 15 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 102.02	$ 66.81	153%	167	167
99202	Office o/p new sf 15 min	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 102.02	$ 56.79	180%	133	132
99203	Office o/p new low 30 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 158.71	$ 105.11	151%	1,037	1,007
99203	Office o/p new low 30 min	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 158.71	$ 89.34	178%	1,448	1,388
99204	Office o/p new mod 45 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 238.74	$ 158.11	151%	1,181	1,125
99204	Office o/p new mod 45 min	ALL	Adult and Child	Physician Assistant, Nurse Practitioners, Clinical Nurse Specialists	Statewide	$ 238.74	$ 134.39	178%	1,183	1,131
99205	Office o/p new hi 60 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 315.33	$ 209.22	151%	215	211
99205	Office o/p new hi 60 min	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 315.33	$ 177.84	177%	150	144
99211	Off/op est may x req phy/qhp	ALL	Adult and Child	Physicians, Other	Statewide	$ 32.16	$ 21.18	152%	574	278
99211	Off/op est may x req phy/qhp	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 32.16	$ 18.00	179%	30	22
99212	Office o/p est sf 10 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 79.76	$ 52.44	152%	567	465
99212	Office o/p est sf 10 min	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 79.76	$ 44.57	179%	268	246
99213	Office o/p est low 20 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 128.92	$ 85.49	151%	5,123	3,220
99213	Office o/p est low 20 min	ALL	Adult and Child	Physician Assistant, Nurse Practitioners, Clinical Nurse Specialists	Statewide	$ 128.92	$ 72.67	177%	5,566	3,618
99214	Office o/p est mod 30 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 182.19	$ 120.66	151%	4,534	2,721
99214	Office o/p est mod 30 min	ALL	Adult and Child	Physician Assistant, Nurse Practitioners, Clinical Nurse Specialists	Statewide	$ 182.19	$ 102.56	178%	5,287	2,930
99215	Office o/p est hi 40 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 257.22	$ 169.61	152%	839	492
99215	Office o/p est hi 40 min	ALL	Adult and Child	Physician Assistant, Nurse Practitioners, Clinical Nurse Specialists	Statewide	$ 257.22	$ 144.17	178%	406	273
99381	Init pm e/m new pat infant	ALL	Adult and Child	Physicians, Other	Statewide	$ 180.42	$ 101.48	178%	59	58
99381	Init pm e/m new pat infant	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 180.42	$ 86.26	209%	32	31
99382	Init pm e/m new pat 1-4 yrs	ALL	Adult and Child	Physicians, Other	Statewide	$ 180.42	$ 106.65	169%	11	11
99382	Init pm e/m new pat 1-4 yrs	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 180.42	$ 90.65	199%	18	18
99383	Prev visit new age 5-11	ALL	Adult and Child	Physicians, Other	Statewide	$ 180.42	$ 110.77	163%	21	21
99383	Prev visit new age 5-11	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 180.42	$ 94.15	192%	50	50
99384	Prev visit new age 12-17	ALL	Adult and Child	Physicians, Other	Statewide	$ 188.09	$ 124.84	151%	24	24
99384	Prev visit new age 12-17	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 188.09	$ 106.11	177%	43	43
99385	Prev visit new age 18-39	ALL	Adult and Child	Physicians, Other	Statewide	$ 182.82	$ 121.37	151%	17	17
99385	Prev visit new age 18-39	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 182.82	$ 103.16	177%	33	33
99386	Prev visit new age 40-64	ALL	Adult and Child	Physicians, Other	Statewide	$ 211.25	$ 140.09	151%	4	4
99386	Prev visit new age 40-64	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 211.25	$ 119.08	177%	24	23
99391	Per pm reeval est pat infant	ALL	Adult and Child	Physicians, Other	Statewide	$ 138.34	$ 91.02	152%	428	194
99391	Per pm reeval est pat infant	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 138.34	$ 77.37	179%	466	203
99392	Prev visit est age 1-4	ALL	Adult and Child	Physicians, Other	Statewide	$ 147.54	$ 97.08	152%	494	368
99392	Prev visit est age 1-4	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 147.54	$ 82.52	179%	444	370
99393	Prev visit est age 5-11	ALL	Adult and Child	Physicians, Other	Statewide	$ 147.09	$ 97.08	152%	413	406
99393	Prev visit est age 5-11	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 147.09	$ 82.52	178%	392	388
99394	Prev visit est age 12-17	ALL	Adult and Child	Physicians, Other	Statewide	$ 161.06	$ 106.36	151%	345	343
99394	Prev visit est age 12-17	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 161.06	$ 90.41	178%	284	281
99395	Prev visit est age 18-39	ALL	Adult and Child	Physicians, Other	Statewide	$ 164.98	$ 109.62	151%	50	50
99395	Prev visit est age 18-39	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 164.98	$ 93.18	177%	51	49
99396	Prev visit est age 40-64	ALL	Adult and Child	Physicians, Other	Statewide	$ 175.60	$ 116.61	151%	23	23
99396	Prev visit est age 40-64	ALL	Adult and Child	Physician Assistant, Nurse Practitioners, Clinical Nurse Specialists	Statewide	$ 175.60	$ 99.12	177%	32	32
99401	Prev med cnsl indiv apprx 15	ALL	Adult and Child	Physicians, Other	Statewide	$ 53.85	$ 35.46	152%	6	6
99401	Prev med cnsl indiv apprx 15	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 53.85	$ 30.14	179%	13	13
99402	Prev med cnsl indiv apprx 30	ALL	Adult and Child	Physicians, Other	Statewide	$ 88.60	$ 58.27	152%	3	3
99404	Prev med cnsl indiv apprx 60	ALL	Adult and Child	Physicians, Other	Statewide	$ 156.65	$ 103.84	151%	-	-
99404	Prev med cnsl indiv apprx 60	ALL	Adult and Child	Nurse Practitioners	Statewide	$ 156.65	$ 88.26	177%	1	1
99406	Behav chng smoking 3-10 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 20.97	$ 13.51	155%	-	-
99406	Behav chng smoking 3-10 min	ALL	Adult and Child	Nurse Practitioners	Statewide	$ 20.97	$ 11.48	183%	1	1
99415	Prolng clin staff svc 1st hr	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 27.91	$ 18.30	153%	1	1
99421	Ol dig e/m svc 5-10 min	Primary Care & Obstetrics & Gynecological	Adult and Child	Physicians, Other	Statewide	$ 40.29	$ 14.13	285%	4	4
99426	Prin care mgmt staff 1st 30	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 88.51	$ 59.59	149%	34	9
99427	Prin care mgmt staff ea addl	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 67.19	$ 48.27	139%	23	7
99439	Chrnc care mgmt staf ea addl	ALL	Adult and Child	Physicians, Other	Statewide	$ 68.03	$ 44.13	154%	2	2
99439	Chrnc care mgmt staf ea addl	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 68.03	$ 37.51	181%	4	4
99458	Rem physiol mntr ea addl 20	ALL	Adult and Child	Physicians, Other	Statewide	$ 55.90	$ 37.11	151%	12	1
99487	Cplx chrnc care 1st 60 min	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 189.46	$ 126.03	150%	3	2
99489	Cplx chrnc care ea addl 30	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 102.20	$ 67.52	151%	3	2
99490	Chrnc care mgmt staff 1st 20	ALL	Adult and Child	Physicians, Other	Statewide	$ 89.27	$ 58.41	153%	15	11
99490	Chrnc care mgmt staff 1st 20	ALL	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 89.27	$ 49.65	180%	47	11
99495	Transj care mgmt mod f2f 14d	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 291.85	$ 192.41	152%	6	6
99495	Transj care mgmt mod f2f 14d	Primary Care	Adult and Child	Nurse Practitioners	Statewide	$ 291.85	$ 163.55	178%	4	4
99496	Transj care mgmt high f2f 7d	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 394.86	$ 260.92	151%	8	6
99496	Transj care mgmt high f2f 7d	Primary Care	Adult and Child	Physician Assistant, Nurse Practitioners	Statewide	$ 394.86	$ 221.78	178%	11	10
99497	Advncd care plan 30 min	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 117.78	$ 77.57	152%	3	3
99387	Init pm e/m new pat 65+ yrs	ALL	Adult and Child	Physicians, Other	Statewide	$ 229.09	$ 152.13	151%	-	-
99397	Per pm reeval est pat 65+ yr	ALL	Adult and Child	Physicians, Other	Statewide	$ 188.54	$ 125.43	150%	-	-
99403	Prev med cnsl indiv apprx 45	ALL	Adult and Child	Physicians, Other	Statewide	$ 122.38	$ 80.22	153%	-	-
99407	Behav chng smoking > 10 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 39.35	$ 25.91	152%	-	-
99408	Audit/dast 15-30 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 48.95	$ 32.23	152%	-	-
99409	Audit/dast over 30 min	ALL	Adult and Child	Physicians, Other	Statewide	$ 94.77	$ 62.03	153%	-	-

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99416	Prolng clin staff svc ea add	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 13.06	$ 8.60	152%	-	-
99422	Ol dig e/m svc 11-20 min	Primary Care & Obstetrics & Gynecological	Adult and Child	Physicians, Other	Statewide	$ 67.46	$ 27.68	244%	-	-
99423	Ol dig e/m svc 21+ min	Primary Care & Obstetrics & Gynecological	Adult and Child	Physicians, Other	Statewide	$ 96.23	$ 43.55	221%	-	-
99424	Prin care mgmt phys 1st 30	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 118.58	$ 78.77	151%	-	-
99425	Prin care mgmt phys ea addl	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 85.70	$ 56.94	151%	-	-
99437	Chrnc care mgmt phys ea addl	ALL	Adult and Child	Physicians, Other	Statewide	$ 85.26	$ 55.77	153%	-	-
99446	Ntrprof ph1/ntrnet/ehr 5-10	ALL	Adult and Child	Physicians, Other	Statewide	$ 25.61	$ 16.86	152%	-	-
99447	Ntrprof ph1/ntrnet/ehr 11-20	ALL	Adult and Child	Physicians, Other	Statewide	$ 52.24	$ 34.02	154%	-	-
99448	Ntrprof ph1/ntrnet/ehr 21-30	ALL	Adult and Child	Physicians, Other	Statewide	$ 77.27	$ 50.51	153%	-	-
99449	Ntrprof ph1/ntrnet/ehr 31/>	ALL	Adult and Child	Physicians, Other	Statewide	$ 102.75	$ 68.34	150%	-	-
99451	Ntrprof ph1/ntrnet/ehr 5/>	ALL	Adult and Child	Physicians, Other	Statewide	$ 50.19	$ 32.38	155%	-	-
99452	Ntrprof ph1/ntrnet/ehr rfrl	ALL	Adult and Child	Physicians, Other	Statewide	$ 48.73	$ 32.97	148%	-	-
99473	Self-meas bp pt educaj/train	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 19.31	$ 12.71	152%	-	-
99474	Self-meas bp 2 readg bid 30d	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 23.24	$ 15.60	149%	-	-
99491	Chrnc care mgmt phys 1st 30	ALL	Adult and Child	Physicians, Other	Statewide	$ 121.35	$ 79.92	152%	-	-
99498	Advncd care plan addl 30 min	Primary Care	Adult and Child	Physicians, Other	Statewide	$ 102.62	$ 67.58	152%	-	-
99412	Preventive counseling group	ALL	Adult and Child	Physicians, Other	Statewide	$ -	$ 22.65		-	-
99453	Rem mntr physiol param setup	ALL	Adult and Child	Physicians, Other	Statewide	$ -	$ 18.09		-	-
99454	Rem mntr physiol param dev	ALL	Adult and Child	Physicians, Other	Statewide	$ -	$ 39.15		-	-
99457	Rem physiol mntr 1st 20 min	ALL	Adult and Child	Physicians, Other	Statewide	$ -	$ 45.63		-	-
99483	Assmt & care pln pt cog imp	Primary Care & Outpatient Mental Health	Adult and Child	Physicians, Other	Statewide	$ -	$ 255.45		-	-
99484	Care mgmt svc bhvl hlth cond	Primary Care & Outpatient Mental Health	Adult and Child	Physicians, Other	Statewide	$ -	$ 51.36		-	-
99492	1st psyc collab care mgmt	ALL	Adult and Child	Physicians, Other	Statewide	$ -	$ 138.58		-	-
99493	Sbsq psyc collab care mgmt	ALL	Adult and Child	Physicians, Other	Statewide	$ -	$ 128.68		-	-
99494	1st/sbsq psyc collab care	ALL	Adult and Child	Physicians, Other	Statewide	$ -	$ 53.59		-	-

Notes:

1) The data is only FFS claim data that excludes FQHC, RHCs, Hospitals, claims where Medicaid was not the primary payor, zero paid claims, and any claim that had a facility place of service. The Medicaid payment rate reflects the CPT code without any modifiers.
2) Service Category that indicates "ALL" includes Primary Care, Obstetrics & Gynecological, and Outpatient Mental Health.
3) For combinations that did not have any utilization, the State identified the base Medicaid payment rate to display the Medicaid to Medicare rate comparison. All providers in the State are paid at that level for Medicaid.
4) New Mexico has broken out provider types (by rendering provider type) that has utilization within the claim dataset and where Medicare pays a different rate than the base Medicare rate. If Medicare does not pay a rate differential, the provider type was grouped with the Physician provider type as "Other".
5) For provider type, New Mexico does not pay rate differentials. As a result, provider types that have the same Medicare rate have been combined into one line. For example, physician assistants, nurse practitioners, and clinical nurse specialists have been combined since they are paid at 85% of Medicare's base rate.
6) New Mexico does not have rate differences between geographical locations. Medicare has one statewide rate for New Mexico as well so there is no additional breakout required for rate identification.
7) New Mexico does not have rate differences between populations. As a result, we have listed Adult/Child together on a single line.
8) New Mexico does not have rate differentials between service categories. The applicable service category identified by CMS is listed on a single line.