Mandatory appropriate use criteria for advanced imaging

Frequently Asked Questions

What is happening? What is PAMA?
The Protecting Access to Medicare Act (PAMA) requires that providers consult appropriate use criteria (AUC) through a qualified clinical decision support mechanism (CDSM) at the time of ordering advanced imaging services for Medicare patients. The program goes into effect January 1, 2020.

What are the benefits?
The program is intended to reduce Medicare costs and improve quality of care by reducing inappropriate imaging. In addition, the online clinical decision support tool can assist ordering providers in selecting the most appropriate study for a particular clinical situation.

What tests are considered “advanced diagnostic imaging?”
- CT scans
- MRI
- Nuclear medicine studies
- PET scan

Who will this impact?
All providers who order advanced diagnostic imaging services for patients at the hospital, at physician offices, hospital outpatient departments (including Emergency Department and Observation), and ambulatory surgery centers.

When does this mandate go into effect?
- **January 1, 2020:** Mandatory reporting begins. (This will be considered an educational and operational testing year, which means claims will not be denied if proper AUC consultation information is not included).
- **January 1, 2021:** Mandatory reporting begins. (This means claims will be denied if proper AUC consultation information is not included).

While January 1, 2020 marks the formal start of the program, the first year will be an educational and operational testing period, during which CMS will not deny claims that incorrectly report AUC information. However ordering providers must consult a qualified CDSM and furnishing providers must document AUC content which provides required evidence of consultation.

Beginning January 1, 2021, Medicare claims for imaging services will be denied if AUC consultation information is not correctly reported on the claim. This is because either an inappropriate procedure may have been ordered, or because provider did not consult a mandatory qualified clinical decision support mechanism at time of order.

What is AUC?
AUC is a criteria developed or endorsed by national professional medical specialty societies or other provider-led entities to assist ordering and furnishing professionals to make the most patient-
appropriate treatment decision for the specific clinical condition. To the extent possible, criteria must be evidence based.

How will this be done?
This must be done and documented via a qualified clinical decision support mechanism (CDSM) approved by the Centers for Medicare & Medicaid (CMS).

What is CareSelect Imaging?
NDSC CareSelect is the CDSM we will use across PSJH to consult evidence-based clinical guidelines solutions for advanced diagnostic imaging services. CareSelect has been built into our electronic health records and is currently undergoing testing by various clinicians and stakeholders.

How does it work?
Integrated into our electronic health records, this new tool considers the details of a patient’s condition as evaluated by the physician. Then, it offers recommendations on which advanced imaging study would be most appropriate, considering patient’s age, sex and clinical indication as well as other factors such as cost, and radiation usage. It will indicate whether the selected procedure is appropriate or recommend a more appropriate procedure(s) for the patient’s clinical indication. These recommendations are provided by physician-led entities that include the American College of Radiologists, American College of Cardiology, etc.

What will CareSelect tell me?
The tool will consider multiple factors on the patient and provide a recommendation as to whether the ordered procedure is appropriate or whether an alternative would be better. The tool will provide an identification number with each consult as well as one of the following status statements:
- Appropriate
- Not appropriate
- Not applicable

Providers will be required to include evidence of AUC consultation which includes the vendor, the identification number and appropriateness score for each referral.

When will CareSelect be available?
We anticipate the CareSelect tool to go live in our electronic health records and be available for providers to start getting familiar with the reporting process on:
- October 1, 2019: CareSelect will be live in Epic and Meditech
- December 1, 2019: CareSelect will be live in Allscripts for Heritage Medical Group
- TBD: CareSelect in Allscripts for Covenant Medical Group

Does this only apply to Medicare patients?
The law applies only to Medicare patients, but our implementation will include patients in all payer classes. This decision was made to create a consistent experience for ordering providers, to provide consistent clinical decision support and to avoid financial implications if the payer class is updated after advanced imaging orders are placed.

Are inpatient orders included in this implementation?
Yes. The implementation will include orders placed in the inpatient and outpatient setting. This decision was made to set a high standard for patient safety, provide consistent clinical decision support for
advanced imaging, and avoid financial implications if a patient’s status changes from inpatient to outpatient after advanced imaging orders are placed.

**What about orders from referring providers at external organizations?**

Consulting the AUC is **required** by CMS and PAMA when ordering advanced diagnostic imaging services, both internal and external. There are three options for external ordering providers:

1. Referring providers can use their own EHR with qualifying clinical decision support as long as all required elements are on the order (name of the approved qualified clinical decision support vendor, the decision support number that is assigned during the ordering process, and the assigned appropriateness score).
2. Referring providers can use a free [NDSC web portal](https://www.ndscwebportal.com) for ordering that provides the required decision support.
3. **For Epic users only:** For high frequency external providers, Epic CareLink accounts are being set up to allow ordering using our system. Access Epic CareLink forms to get started.

**How do I learn more and access training resources?**

Visit the Providence St. Joseph Health CareSelect resource site at [https://caregiverheadlines.org/careselectimaging](https://caregiverheadlines.org/careselectimaging).