Satisfying the Appropriate Use Criteria Program Requirements

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Protecting Access to Medicare Act (PAMA)

- Signed into law 2014

- Included a mandate that ordering providers consult appropriate use criteria (AUC) via electronic CDS when ordering outpatient advanced imaging exams for Medicare patients
Appropriate Use Criteria (AUC)

• AUC: the clinical guidelines that providers consult to comply with the mandate

• CMS approved Provider Led Entities (PLE) to maintain the AUC rather than trying to approve individual criteria itself

• American College of Radiology
Clinical Decision Support (CDS)

• CDS mechanisms: the electronic tools that allow providers to consult AUC during ordering

• How does the CDS consult actually happen? What does it look like?

• CareSelect, Stanson Health (Premier)
Advanced Imaging Exams for Medicare pts

• CT scans
• MRI exams
• Nuclear Medicine exams
• PET scans

• NOT plain X-rays

• Traditional Medicare part B only at this time
  • Primary only
Demonstration of consultation

• How ordering providers will demonstrate they consulted AUC through an approved mechanism...

• How rendering providers will submit that information to CMS...

• How CMS will penalize those providers who do not comply...
  • Both ordering and rendering
Demonstration of consultation

1. G-Code
   • Indicates which CDS mechanism (CareSelect) was consulted

2. Modifier code
   • Indicates whether the order adhered to AUC, did not adhere to AUC, or if AUC was N/A
   • Lacked AUC consultation
   • Qualified for exception (emergency, part A, EHR system failure, etc.)

3. NPI of the ordering provider
Accountability

• What happens if I don’t provide AUC consultation information?

• Rendering providers will not receive payment for the procedure
  • Now will begin 1/1/2022

• CMS will identify up to 5% of ordering providers as outliers and require them to obtain preauthorization when ordering imaging for Medicare patients
  • Was scheduled for 1/1/2023. Now?
Order the exam
Pop-up window
Check for appropriateness & evidence
Review evidence for other procedures

<table>
<thead>
<tr>
<th>Radiologic Procedure</th>
<th>Rating</th>
<th>Comments</th>
<th>RRL*</th>
</tr>
</thead>
<tbody>
<tr>
<td>MRI head without and with IV contrast</td>
<td>8</td>
<td></td>
<td>O</td>
</tr>
<tr>
<td>MRI head without IV contrast</td>
<td>7</td>
<td></td>
<td>O</td>
</tr>
<tr>
<td>CT head without IV contrast</td>
<td>7</td>
<td></td>
<td>O</td>
</tr>
<tr>
<td>CT head without and with IV contrast</td>
<td>5</td>
<td></td>
<td>O</td>
</tr>
<tr>
<td>MRA head without and with IV contrast</td>
<td>4</td>
<td></td>
<td>O</td>
</tr>
<tr>
<td>MRA head without IV contrast</td>
<td>4</td>
<td>Perform this procedure in selected cases when vascular disease suspected.</td>
<td>O</td>
</tr>
<tr>
<td>CTA head with IV contrast</td>
<td>4</td>
<td></td>
<td>O</td>
</tr>
<tr>
<td>CT head with IV contrast</td>
<td>3</td>
<td></td>
<td>O</td>
</tr>
<tr>
<td>Arteriography cervicocerebral</td>
<td>2</td>
<td>This procedure is not used as a primary diagnostic tool.</td>
<td>O</td>
</tr>
</tbody>
</table>

**Rating Scale:** 1,2,3 Usually not appropriate; 4,5,6 May be appropriate; 7,8,9 Usually appropriate

*Relative Radiation Level
Compare and choose procedure
AUC consultation details migrate to order

<table>
<thead>
<tr>
<th>Requested Start Date/Time:</th>
<th>03/08/2023</th>
<th>CST</th>
</tr>
</thead>
</table>

**Details for CT Head or Brain w/ + w/o Contrast**

- **Special Instructions:**
- **Patient Has IV:**
- **Procedure Location:** BWMC
- **Imaging Subspecialty:**
- **AUC Score:** 5
- **Anesthesia Provider Requested:**

**Priority:** Routine

**Consulting Physicians:**

**Transport Mode:**

**Patient on O2:**

**ABN Status:**

**Scheduling Instructions:**

**AUC Acknowledgement Reason:**

**AUC Order Adherence Modified:** ME

**Reason for Exam:** Headache, chronic, with new fea...

**Preop:**

**Sedation Type:**

**Future Order:**

**ABN Reason:**

**AUC DSN:** E897522710

**AUC Acknowledgement Reason Comments:**

**Qualified CDSM Utilized:** G1004
Outbound claim to CMS

Example 1: An Emergency Room Claim – CT is being rendered to a patient with a suspected or confirmed emergency medical condition, for the MRI there is no suspected or confirmed emergency medical condition.

CT Ordering professional is not required to consult a clinical decision support mechanism for CT.

CDSM consulted for MRI and order adheres to the criteria.