Clinical Decision Support

"Appropriate Use Criteria (AUC)

PAMA (section 218)

- Protecting Access to Medicare Act of 2014
 - Signed into law April 1, 2014
 - Implementation date January 1, 2017...?
 - Mandates that physicians and other providers consult with appropriate use criteria (AUC) developed by medical specialty societies when ordering advanced diagnostic imaging (MRI, CT, NM, PET) for their Medicare Patients.
 - Rendering facilities and interpreting physicians must provide documentation that AUC was consulted in order to be paid by Medicare

continued...

- PC, TC, Global and HOPPS claims effected
- Exclusions (inpt (part A) and significant hardship (determined case by case i.e. rural without internet)
- November 15, 2015 HHS will specify AUC from those developed or endorsed by national medical specialty societies or provider-led organizations
- April 1, 2016: HHS to identify initial list of "Qualified CDS Mechanisms" (QCDSM)
- January 1, 2017?: ordering professionals will be required to consult a QCDSM: the QCDSM will generate documentation that
 - 1) it was consulted
 - 2) whether the order adhered to AUC and
 - 3) NPI of ordering professional. The documentation could be in the form of a DSN.

Special Note:

Ordering professionals identified as outliers versus their peers will be subject to prior-authorization in January 1, 2020

How is Northern Michigan positioned for this change

- Pilot program with the NPO is ahead of many markets
- The tool used in the study was developed with the American College of Radiology and National Decision Support Company. This tool should have a high likelihood of being deemed a "qualified clinical decision support mechanism" (QCDSM)
- Leaders from the ACR and NDSC are working with CMS as they determine how to operationalize the legislation that was passed
- It would be beneficial to get more practice prior to "go live" for the Medicare population

Opportunity for practice

- New contracts
- Educational opportunities
- Choosing Wisely topics linked to radiologists maintenance of certification.

Ultimate goal(s) for the region

- Reduce #1 pain point: pre-authorization hassles, related expenses & administrative burdens
- Move region away from non-uniform payer driven pre-authorization processes to a provider led universal clinical decision support approach for imaging services which positively impacts patient care and creates the opportunity to develop new quality based metrics for imaging services

Preauthorization CDS: Appropriate Use Criteria

Unique opportunity in NM

- Well positioned
- Unique market
- Successes to date
- Practice prior to moving larger payer to CDS approach
- Stay tuned...

Key Contacts

- Jennifer K. Coleman, MHSA, FACHE, CMM
 - Executive Director Grand Traverse Radiologists, PC
 - President, Radiology Business Managers of Michigan (State chapter of RBMA)
- Kris Elliot, MS, CPHIM
 - Director, Quality, Northern Physicians Organization

jcolemangtr@gmail.com