



# Agenda

- Welcome and Introductions
- Featured topic:

  Preparing for the Appropriate Use Criteria Program:

  The Basics and Beyond
- Resources
- Wrap-up /evaluation



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## Polling Question #1

Who is in the audience? Indicate which type of organization is yours.

- Hospital
- ☐ Clinic or other ambulatory setting
- Partner organization
- Other



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Preparing for the CMS Appropriate Use Criteria Program:

The Basics and Beyond

August 26, 2020

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### **Polling Question #2**

How would you describe your familiarity with the CMS Appropriate Use Criteria Program?

- Familiar with the name, but not program specifics
- Unfamiliar
- Somewhat familiar
- Very familiar

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### **Polling Question #3**

How would you describe your hospital's or clinic's level of readiness for the start of the CMS AUC Program?

- Have not started
- Getting ready
  - collecting information, reviewing tools
- Almost ready
  - implementing tools, training and testing
- Ready
- Unsure

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# Appropriate Use Criteria Basics & The Latest Updates



Kathryn (Katie) Keysor Senior Director – ACR Economic Health Policy

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## How did we get here?

- Need to control inappropriate imaging
- CMS considering pre-authorization
- CDS as alternative

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#### **The Acronyms**

- PAMA: Protecting Access to Medicare Act
- AUC: Appropriate Use Criteria
- qCDSM: Qualified Clinical Decision Support Mechanism
- PLE: Provider-led Entity
- FP: Furnishing professional
- OP: Ordering professional
- PCA: Priority Clinical Areas

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# **Key Goals for Imaging AUC Policy**

- Aids movement towards
   value-based care rather than
   Fee-for-Service
- Evidence-based point of care alternative to prior authorization
- Protects patients from unnecessary procedures and radiation
- Promotes care coordination





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#### **AUC Program Basics**

- An ordering provider must consult, but not necessarily adhere to, AUC for Medicare Part B advanced imaging orders (including CT, MRI, PET and other nuc med scans)
- Furnishing providers of advanced imaging must document each consultation on the CMS claim in order to receive reimbursement:
  - A unique CDSM vendor G code
  - CMS-specified modifiers related to consultation results or, if applicable, exemptions
- Providers can access imaging AUC either via a qualified CDSM integrated into an electronic health record system or a stand-alone qualified CDSM
- In the future, CMS intends to review the interactions to determine "outliers" — referring providers with low AUC adherence rates
  - May be subject to add'l prior authorization processes for the exams they order

**CMS** Rules for AUC Program

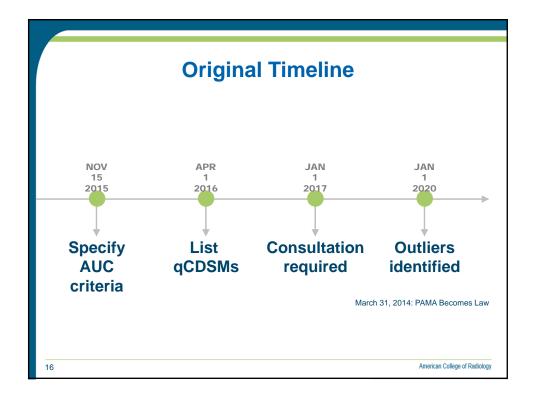
- There must be at least one qCDSM that offers a <u>no</u> cost web-based portal (currently 3 free options)
- Tool must provide immediate feedback to ordering professional on appropriateness guidance.
- Agency approves multiple qCDSMs (currently 20 options) capable of either integrating directly into, or are seamlessly interoperable with, existing health IT systems.

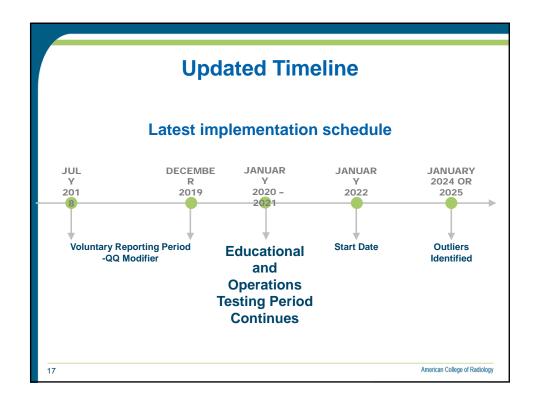
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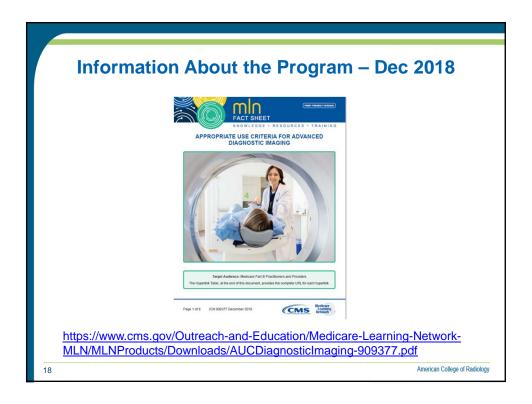
### **Exceptions**

- Emergent services when provided to patients with emergency medical conditions as defined by EMTALA.
- Inpatients
- Critical Access Hospitals
- Ordering professional that experience a significant hardship such as:
  - Insufficient internet access
  - Electronic Medical Records or CDSM issues
  - Extreme and uncontrollable circumstances

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#### **Recent Program Update**

- Nothing about AUC in the CY2021 Medicare Physician Fee Schedule Proposed Rule
- Claims Guidance (Released July 2019)
  - CMS Transmittal 2323 (CR11268)

https://www.cms.gov/Regulations-and-Guidance/Guidance/Transmittals/2019-Transmittals-Items/R2323OTN.html

MLN Matters: MM11268

https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM11268.pdf

## **Priority Clinical Areas**

- 8 Priority Clinical Areas for outlier determination
  - Coronary artery disease (suspected or diagnosed)
  - Suspected pulmonary embolism
  - Headache (traumatic and nontraumatic)
  - Hip pain
  - Low back pain
  - Shoulder pain (to include suspected rotator cuff injury)
  - Cancer of the lung (primary or metastatic, suspected or diagnosed)
  - Cervical or neck pain
- "Upon full program implementation, please note that AUC consultation is required for all advanced diagnostic imaging services, not just those within the priority clinical areas."

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#### **Outliers**

- Will be subject to prior authorization
- "Before the prior authorization component of this program begins, there will be notice and comment rulemaking to develop outlier methodology"

Source: CMS Transmittal 2323

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# What is expected during education and testing period?

- "During this phase of the program claims will not be denied for failure to include...or for misreporting AUC information..."
- "During [this phase] we expect ordering professionals to begin consulting qualified CDSMs and providing information to the furnishing practitioners and providers for reporting on their claims."
- 2022: New full implementation target

Source: CMS Transmittal 2323

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### **Claims processing requirements**

- NPI of the ordering professional must be on claim.
- There is a distinct G-code for each of the qualified CDSMs.
  - G1000 G1010
- Eight new modifiers were created for AUC outcome

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### **Hardship Modifiers**

Ordering professional is not required to consult a clinical support mechanism due to:

- MA: Patient with suspected or confirmed emergent condition
- MB: Insufficient Internet Access
- MC: EHR or CDSM vendor issues
- MD: Extreme and uncontrollable circumstances

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#### **Adherence Related Modifiers**

#### The order:

- ME: Adheres to the AUC in the CDSM consulted
- MF: Does not adhere
- MG: Does not have an AUC in the CDSM consulted

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#### **Unknown**

MH: Unknown if OP consulted a CDSM...related information was not provided

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#### What should we do...

- Meet with those in charge of the implementation.
  - Offer to be a part of the implementation team.
  - Meet regularly and often.
- Find out about the educational plan for referring providers regarding this AUC requirement.
- Discuss/resolve "feedback" to referrers who are not yet complying with the requirement.
- Continue to check CMS web site for additional guidance:

https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Appropriate-Use-Criteria-Program/OandE

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Questions?
Contact: PAMA-AUC@acr.org

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## **Polling Question #4**

To what extent is ordering imaging exams based on evidence-based guidelines emphasized at your facility?

- This is a high priority.
- This is somewhat of a priority.
- ☐ This is not a priority.
- Don't really have enough information to respond.

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American College of Radiology ACR Appropriateness Criteria®



Christine Waldrip, RN, MHA
Director, ACR Appropriateness Criteria

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#### **Objectives**

- Provide an overview of ACR Appropriateness Criteria<sup>®</sup> development process and methodology
- Explain how to access the AC and to provide feedback
- Describe how the AC are used in Clinical Decision Support

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### **ACR Appropriateness Criteria**

- Evidence-based guidelines to assist referring physicians and other providers in making the most appropriate imaging or treatment decision for a specific clinical condition
- Appropriate Use Criteria (CMS terminology)

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### **ACR Appropriateness Criteria**

- Been around for over 25 years
- 26 expert panels (DI and IR)
- 193 topics with over 1,680 clinical scenarios
- Over 35 new topics in development
- Most comprehensive imaging guidance available

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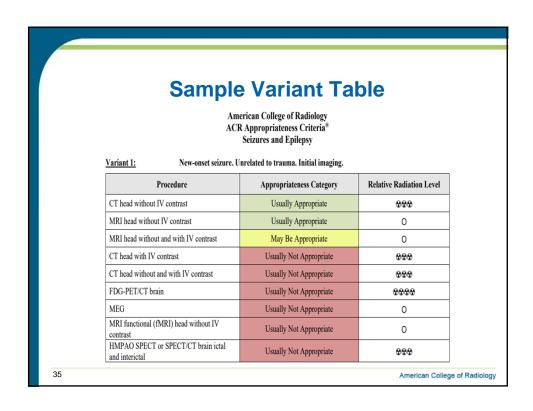
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### **ACR Appropriateness Criteria**

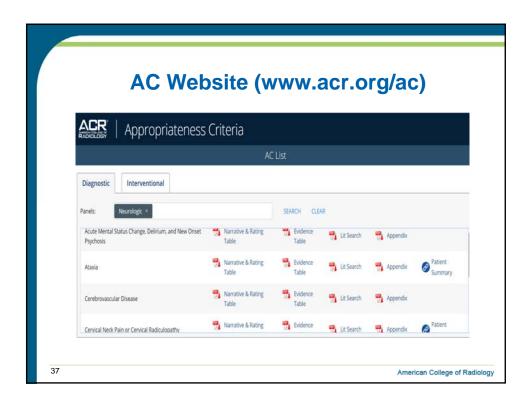
- Rigorous methodology
  - Lit searches, evidence tables
  - RAND/UCLA appropriateness method
  - Annual review
- Over 600 total participants
  - Radiology experts
  - Clinicians from over 43 societies, including specialists and primary care

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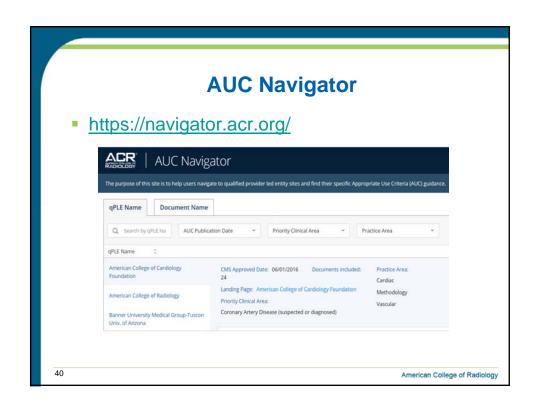
# Feedback site https://review.acr.org/

- Stakeholder review of AC content
- ACR staff will track and manage feedback
- All input will be reviewed and addressed

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# **Clinical Decision Support**

- Care Select Imaging™
  - Qualified clinical decision support mechanism
  - ACR Select®
    - Digital representation of the ACR AC
    - Integrated with EHR
    - Free portal also available



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# For More Information on the ACR Appropriateness Criteria®

VISIT OUR WEB SITE www.acr.org/ac

EMAIL US acr\_ac@acr.org

CALL US **800-227-5463 x3724** 

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# Polling Question #5

Which of the following are the biggest challenges (actual or perceived) to readiness?

- Cost of purchasing and implementing CDSM tools
- Time for providers and staff to learn and implement
- "Buy in" of providers and staff
- EHR and/or billing software
- Too early to say

(Check all that apply.)

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# PAMA Implementation

Louis J. Capponi, MD, FACP VP & Chief Medical Informatics Officer







#### **Considerations for Success**

- 1. Take advantage of time & implement early
- 2. Develop a strong interdisciplinary team
- 3. Communicate broadly
- 4. The work begins after go live
  - a. Update your Indications
  - b. Determine what to keep
  - c. Focus on individual providers
  - d. Ongoing Governance

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#### **Ancillary Decision Support Steering Committee**

VP Ancillary Services (co-chair)

CMO of Hospital (co-chair)

President Medical Group

**CMIO** 

Director, Information Technology

Director, Informatics

Director, Radiology

Director, Patient Access

Project Manager





SCL Health

#### **Project Goals**

- 1. Assure that patients receive the most appropriate testing.
- 2. Share the most up-to-date imaging guidelines to avoid unnecessary patient cost and radiation exposure.
- 3. Reduce unnecessary advanced imaging exams, based on decision support and appropriate use criteria.
- 4. Meet CMS requirements to support full reimbursement for advanced imaging exams.



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#### **Communication Plan**

Stakeholder	Key Messages	Intervention (Material)	Event or Channel	Notes
Radiologists	Overview & background (why)     Training on CareSelect     The consultation code must be in the order to a ensure reimbursement & what to do if not	Tip sheet: Infographic w/ background & screenshots     Video-demo     Epic Upgrade training materials     Slide deck	MEC PLC All Provider Meetings All Provider Meetings Care site leadership meetingscascade info Learning Home Dashboard eSummit InBasket?	A radiologist may be the ordering provider.     include mammographers.
Radiology department leadership	Overview & background (why)     Training on CareSelect	Tip sheet: Infographic w/ background & screenshots     Video-demo     Epic Upgrade training materials     Side deck	IAC     Care site leadership meetingscascade info	Serve as a go-to resource
Medical group clinicians on the outpatient side	Overview & background (why)     Training on CareSelect	Tip sheet: Infographic w/ background & screenshots     Video-demo	Presentation to Medical Group leadership across all markets (Dr. Capponi)	Give extra focus to Neurology and Cardiology (focused attention during rollout and focused feedback after go

#### Stakeholder Groups:

Radiologists

Radiology department leadership

Medical group clinicians on the outpatient side

Clinic MA or nurse

Community providers

Ordering clinicians on the ER and inpatient side

Medical group leadership

Medical Executive Committees

Patient Access-Schedulers

Physician Leadership Councils

Radiology Technologists

Patient Access-Billing

Project implementation team members

Technology Support team members

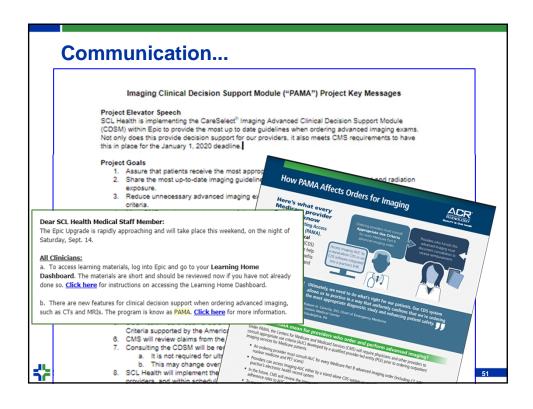
Touchstone

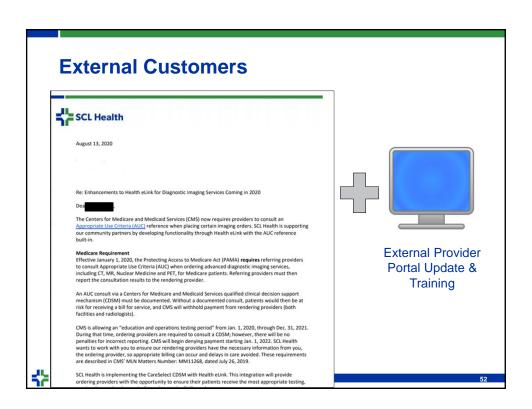
Spectrum

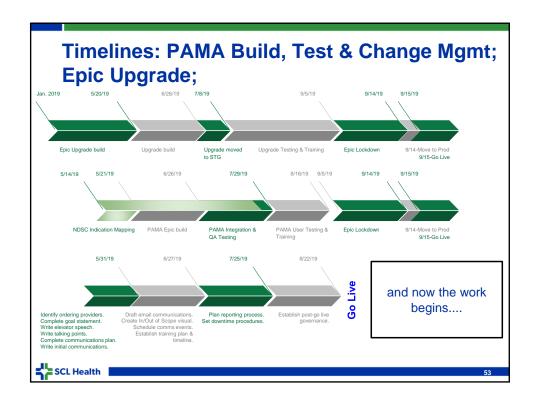
**Community Connect Partners** 

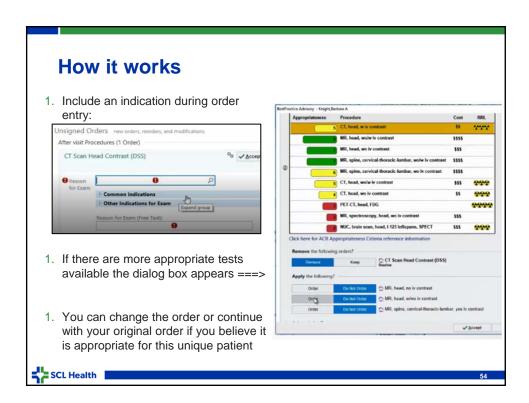
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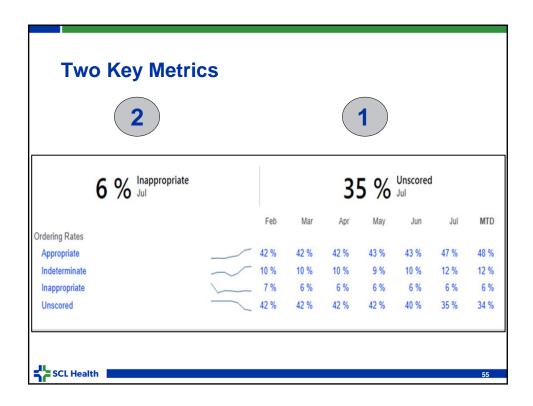
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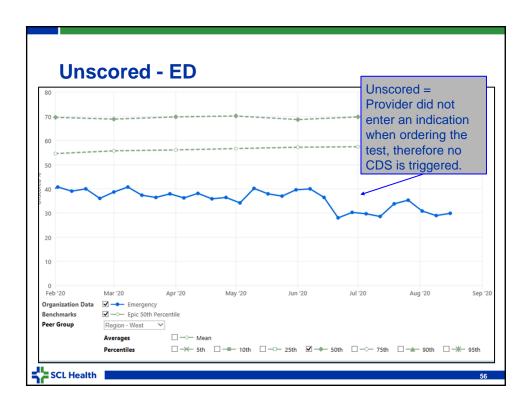


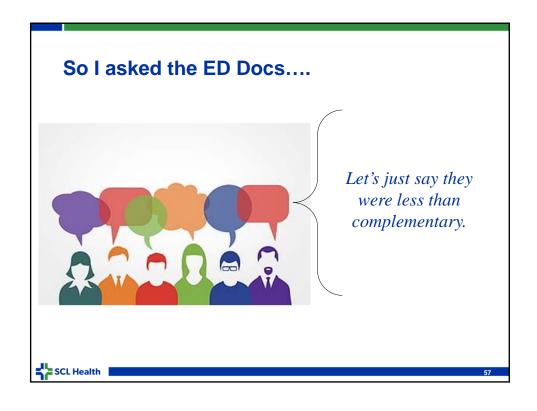


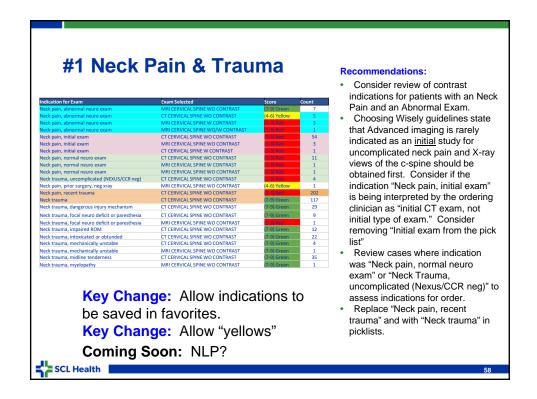


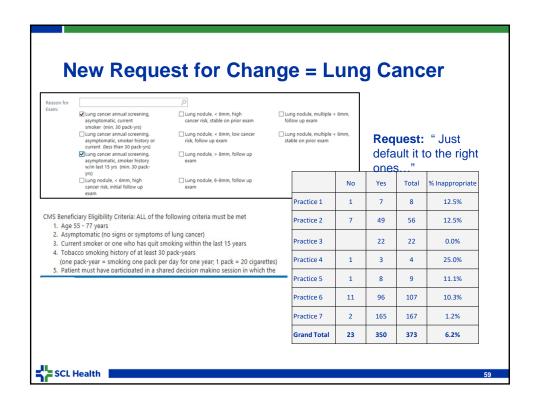


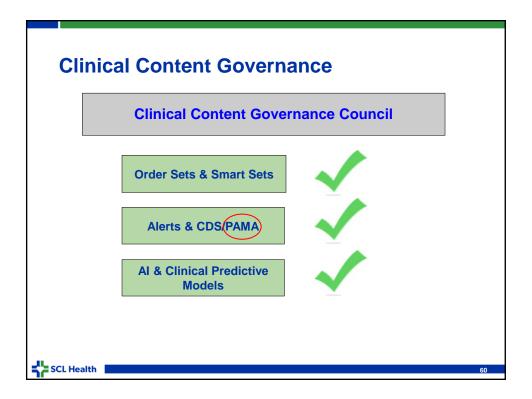
















### **QHi Training Session**

Thursday, August 27 1:30 to 2:30 p.m. CT



In this QHi training session, we will review the basics, demonstrate the newly designed data submission page, review uploading the EDTC data, multi-month submission, and walk through reporting opportunities.

Here is the link to register:

https://cc.readytalk.com/r/qw2963I9dxkx&eom





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