

# 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
- Traditional Medicare part B only at this time
    - Primary only
- 
- NOT plain X-rays

# 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

+ Add | Document Medication by Hx | Reconciliation | Check Interactions | External Rx History | Rx Plans (0): No Benefit Found

Reconciliation Status  
Meds History | Admission | Discharge

Orders Medication List

View  
Diagnoses & Problems

Diagnoses (Problem) being Addressed this Visit

+ Add Convert Display: Active

IMD

	Annotated Display	Code
	Headache	R51
	History of breast cancer	Z85.3
	Knee pain, right	M25.561
	H/O CT scan	Z92.89
	CVS disease	I25.10
	Cardiac ischemia	I24.9
	Diplopia	H53.2
	Lower back pain	M54.5
	L-S radiculopathy	M54.17

Problems

+ Add Convert No Chronic Problems

Display: All

IMD

Annotated Display	Name of Problem
Abdominal pain in femel...	Epigastric pain
Acute headache	HA - Headache
Acute pain	Acute pain
APNEA	Apnea
CAD in native artery	Coronary arteriosclerosis
Low back pain	Low back pain
Pain of finger	Pain in finger
Polycystic ovarian syndro...	Polycystic ovarian syndr...

Related Results  
Formulary Details

Search:  Advanced Options Type: Inpatient

Folder: Hospitalist Home Search within: All

- Admission Orders
- Discharge Orders
- Infusion Management Point of Care
- Anti-Infectives
- Common Meds
- Common Labs
- Radiology
- Procedures
- Patient Care

Orders for Signature

Details

0 Missing Required Details | Dx Table | Orders For Co-signature | Orders For Nurse Review | Sign

# Pop-up window

✖ Cancel CT Head or Brain w + wo Contrast

Clinical Decision Support for  
**CT Head or Brain w + wo Contrast**

Select or Search for a Reason for Exam

[? Search Tips](#)

**Common Indications (8)**

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- Altered mental status
- Brain mass or lesion, follow-up
- Headache, infection suspected
- Headache, intracranial hemorrhage suspected
- Headache, post traumatic
- Neuro deficit, acute, stroke suspected
- Subdural hematoma
- Syncope, recurrent

NATIONAL  
DECISION SUPPORT  
COMPANY

# Check for appropriateness & evidence

**Cancel CT Head or Brain w + wo Contrast**

Clinical Decision Support for  
**CT Head or Brain w + wo Contrast**

Select or Search for a Reason for Exam

chronic headache

Headache, chronic, with new features

Results focused on **chronic headache** (2) **Reset**

- Headache, chronic, no new features
- Headache, chronic, with new features

Results related to **chronic headache** (13)

- Headache, neuro deficit
- Headache, sinus or mastoid

Appropriateness for a 73 Year Old Female

**View Evidence for Exams**

— Requested Exam —

**CT Head or Brain w + wo Contrast**

5

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☠☠☠☠☠

**Confirm & Order**

**Cancel Order**

# Review evidence for other procedures

**Variant 2:**                      **Chronic headache with new feature or neurologic deficit.**

Radiologic Procedure	Rating	Comments	RRL*
MRI head without and with IV contrast	8		O
MRI head without IV contrast	7		O
CT head without IV contrast	7		☼☼☼
CT head without and with IV contrast	5		☼☼☼
MRA head without and with IV contrast	4		O
MRA head without IV contrast	4	Perform this procedure in selected cases when vascular disease suspected.	O
CTA head with IV contrast	4		☼☼☼
CT head with IV contrast	3		☼☼☼
Arteriography cervicocerebral	2	This procedure is not used as a primary diagnostic tool.	☼☼☼
<b>Rating Scale:</b> 1,2,3 Usually not appropriate; 4,5,6 May be appropriate; 7,8,9 Usually appropriate			<b>*Relative Radiation Level</b>

# Compare and choose procedure

Cancel CT Head or Brain w + wo Contrast

Clinical Decision Support for  
**CT Head or Brain w + wo Contrast**

Select or Search for a Reason for Exam

chronic headache

Headache, chronic, with new features

Results focused on **chronic headache** (2) Reset

- Headache, chronic, no new features
- Headache, chronic, with new features

Results related to **chronic headache** (13)

- Headache, neuro deficit
- Headache, sinus or mastoid
- Headache, temporal arteritis suspected
- Headache, cancer or immunocompromise
- Headache, cluster/trigeminal
- Headache, abnormal ICP suspected
- Headache, with cough or exertion
- Headache, acute, normal neuro exam
- Chronic myeloproliferative disease
- Orbital inflammation, chronic
- Chronic venous hypertension (idiopathic)
- Seizure, chronic, history of trauma

Appropriateness for a 73 Year Old Female

[View Evidence for Exams](#)

— Requested Exam —

**CT Head or Brain w + wo Contrast**

5

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— Appropriate Exams —

**MRI Brain Open Intracranial Proc w Con**

8

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**MRI Brain w + wo Contrast**

8

\$\$\$\$

**CT Head or Brain wo Contrast**

7

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# AUC consultation details migrate to order

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

Details Order Comments Diagnoses

+ [Icons]

*Requested Start Date/Time: 03/06/2020 0935 CST	*Priority: Routine	Reason for exam: Headache, chronic, with new feat...
Special Instructions:	Consulting physician:	Pregnant: No
Patient has IV: <input type="radio"/> Yes <input type="radio"/> No	Transport mode:	Sedation Type:
Procedure Location: BWMC	Patient on O2: <input type="radio"/> Yes <input type="radio"/> No	Future Order: <input type="radio"/> Yes <input type="radio"/> No
Imaging Subspecialty:	ABN Status:	ABN Reason:
AUC Score: 5	Scheduling Instructions1:	AUC DSN: 850792978
Anesthesia Provider Requested?: <input type="radio"/> Yes <input type="radio"/> No	AUC Acknowledgement Reason:	AUC Acknowledgement Reason Comment:
	AUC Order Adherence Modifier: ME	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.														3a PAT. CNTL #	4 TYPE OF BILL	
														3b MED. RES. #	0131	
														3c FED. TAX ID	6 STATEMENT COVERED PERIOD FROM THROUGH	
															01012020	01012020
														38		
CT Ordering professional is not required to consult a clinical decision support mechanism for CT.														a		
														b		
														c		
														d		
42 REV. CD.	43 DESCRIPTION	44 HCPCS/RATES+PPS CODE		45 SERV. DATE	46 SERV. UNITS	47 TOTAL CHARGES	48 NON-COVERED CHARGES	49								
0352	CT SCAN/BODY	74261	MA	010120	1	1000.00										
0450	EMERG ROOM	99285		010120	1	2000.00										
0612	MRI/SPINE	72148	ME	010120	1	1500.00										
0612	MRI/SPINE	G10xx		010120	1	.01										
														CDSM consulted for MRI and order adheres to the criteria.		