

National Decision Support Company Regulatory Brief

A guide to enable and configure your CareSelect® Imaging qualified Clinical Decision Support Mechanism to meet PAMA requirements.

This document uses selected, summarized language from the CMS Medicare Physician Fee Schedule Rulemaking to guide provider compliance with the imaging Appropriate Use Criteria (AUC) provisions of the Protecting Access to Medicare Act of 2014 (PAMA). It is not intended to be legal advice.

Following is an outline of the requirements for a qualified Clinical Decision Support Mechanism (qCDSM). CareSelect Imaging has been fully qualified by CMS as a qCDSM and can make available comprehensive AUC published by multiple qPLEs.

What are the requirements for qualification of a mechanism?

- Make available AUC from qualified Provider Led Entities (qPLEs). CareSelect Imaging makes available AUC from four qPLEs including the American College of Radiology, American College of Cardiology, National Comprehensive Cancer Network, and Society of Nuclear Medicine and Molecular Imaging.
- Make available, at a minimum, AUC that reasonably address common and important clinical scenarios within all Priority Clinical Areas (PCAs) as defined by rulemaking. CareSelect Imaging content provides comprehensive AUC across all PCAs.

A qCDSM must:

- Generate and provide a certification or documentation at the time of order that records which qualified CDSM was consulted, including a Unique Consultation Identifier known as a Decision Support Number (DSN).
- Include the name and National Provider Identifier (NPI) of the ordering professional that consulted the CDSM.
- Include...
 1. whether the service ordered would adhere to specified applicable AUC;
 2. whether the service ordered would not adhere to specified applicable AUC;
 3. or whether there was no applicable AUC available for the service ordered.

The certification or documentation must:

- Be generated each time an Ordering Provider consults a qCDSM.
- Include the DSN identifier generated by the qCDSM.

CareSelect Imaging has been fully qualified as a qCDSM and can make available comprehensive AUC published by multiple qPLEs. Not every service has comprehensive AUC available, and a healthcare organization may select which services to omit from interactive consultation due to a lack of comprehensive AUC, or AUC outside the PCA. The selection of which AUC to consult is covered below.

The contents of this document are intended to convey general information only and not to provide legal advice or opinions.



What must an Ordering Provider (OP) do?

At the start of the program, with respect to an applicable imaging service ordered by an ordering professional and furnished in an applicable setting and paid for under an applicable payment system, an ordering professional must:

- Consult with a qCDSM
- Provide to the furnishing professional the information described above (AUC adherence, applicability, NPI, etc.)

The original PAMA law did not specify the PCAs. The PCAs were introduced in rulemaking by CMS, and therefore CMS cannot limit consultation requirements to just the PCA. The implication being that a provider must consult a qCDSM for every advanced imaging service.

The PCAs were introduced to inform ALL stakeholders – including the qPLEs, the mechanisms, and the consulting healthcare providers where to focus their initial AUC efforts. Minimally, the outlier calculation will focus on the PCA. The PCA will eventually expand to cover all patients.

In cases where certain exams or clinical scenarios are lacking in AUC coverage or AUC outside the PCA, your organization may choose the path of an automated consultation. Under this scenario, in the absence of available AUC, the EMR still initiates the decision support transaction and the mechanism (CareSelect) can return consultation documentation that reflects the lack of applicable AUC for that service.

There are situations when consultation is not required, and these are detailed in the regulation. Exclusions apply for services furnished under Medicare Part A, emergency services, and hardships.

Additional Resources

National Decision Support Company PAMA Webpage:

www.nationaldecisionsupport.com/pama

National Decision Support Company MPFS Rulemaking Updates:

www.nationaldecisionsupport.com/mpfs-final-rule

CareSelect Imaging Open Access qCDSM:

qcsm.nationaldecisionsupport.com

CMS.gov Appropriate Use Criteria Program Overview:

www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Appropriate-Use-Criteria-Program/index.html

CMS Medicare Learning Network AUC Program Fact Sheet:

www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/AUCDiagnosticImaging-909377.pdf