Introduction

In 2014, Congress passed H.R. 4302, known colloquially as the Protecting Access to Medicare Act of 2014 (PAMA). In it, Congress instructed the Centers for Medicare & Medicaid Services (CMS) to specify a program which will require physicians to consult with a qualified clinical decision support mechanism (qCDSM) that relies on established Appropriate Use Criteria (AUC) when ordering certain imaging exams. This program seeks to create an alternative to prior-authorization for Medicare Part B Fee For Service Imaging.

The timeline to comply with this legislation is aggressive, as of January 2021, all claims for Medicare Part B FFS advanced imaging will require evidence of an AUC consultation to be payable.

MEDITECH has partnered with the National Decision Support Company (NDSC) to offer a streamlined method to license and activate the required features for compliance. NDSC offers a widely adopted, market validated solution for delivery of national standard imaging guidelines within MEDITECH.

Through rulemaking, CMS defined that only Provider Led Entities (PLE) may publish AUC. An initial list of PLEs has been approved, including the American College of Radiology (ACR), the National Comprehensive Cancer Care Network (NCCN), and the American College of Cardiology (ACC).

Section 414.94 of this year's final rule sets forth the specifications for a qualified CDSM and establishes January 1, 2021 as the date by which sites must submit evidence of AUC consultation with their claims. Refer to Appropriate Use Criteria program page on CMS.gov for up to date information regarding this regulation.

How Your Organization Can Use MEDITECH to Meet Requirements

qCDSMs must meet the requirements outlined in section 414.94 of this years rule. CMS has outlined these requirements, and qCDSMs will include modules within the EHR, mechanisms independent of the EHR, and a mechanism established by CMS. NDSC’s solution meets and exceeds these requirements.

MEDITECH integrates with NDSC’s CareSelect Imaging CDSM via an API to create a qCDSM. MEDITECH makes web service requests to an external system that evaluates compliance with the AUC and returns the information to MEDITECH to be displayed to the ordering user. The NDSC system will embed all required data elements for a payable claim within MEDITECH. For more information please visit: meditech.nationaldecisionsupport.com.
Planning

We encourage you to plan early. Begin by reaching out to NDSC in the coming weeks to confirm your plans to include the CareSelect Imaging integration in your MEDITECH update and begin contracting. The below schedule will help you plan for this process:

<table>
<thead>
<tr>
<th>When</th>
<th>Your Organization Should</th>
</tr>
</thead>
<tbody>
<tr>
<td>Now</td>
<td>Contact NDSC to request a contract and pricing information</td>
</tr>
<tr>
<td>Now</td>
<td>(1) Sign contract with NDSC, schedule your implementation (if possible, install and test with your MEDITECH update)  (2) Generate exam list for NDSC to map (2) Identify sponsor, physician champion(s), and key IT roles</td>
</tr>
<tr>
<td>May - November 1, 2019</td>
<td>Begin your implementation</td>
</tr>
<tr>
<td>By December 31, 2019</td>
<td>Plan to go LIVE on or before this date with decision support functionality</td>
</tr>
</tbody>
</table>

Implementation

The implementation will take four weeks. The following prerequisites (*) must be complete prior to kicking off your CareSelect Imaging project:

- Provide NDSC with an export of your imaging exam list (MEDITECH has a utility available to assist with this)
- Fully execute your contract with NDSC
- Identify the IT and operational staff from your team who will contribute to the install
- Complete NDSC's Implementation Readiness Checklist

Implementation steps include:

- Basic application configuration
- Reviewing the mapping of your imaging exam list to the exams used by the CareSelect Imaging appropriateness criteria
- Functionality testing
- Communication to your providers

For further information on imaging guidelines for PAMA compliance, please contact:

Allison Kulis  
Manager, Client Support  
MEDITECH  
(781) 774-2637  
akulis@meditech.com

National Decision Support Company  
info@nationaldecisionsupport.com