Appropriate Use Criteria (AUC) Program: Requirements for Ordering Professionals

The Protecting Access to Medicare Act (PAMA) requires the Centers for Medicare & Medicaid Services (CMS) to establish a program that promotes AUC for advanced diagnostic imaging. AUC are evidence-based criteria that assist professionals who order and furnish certain imaging services to make the most appropriate treatment decisions for a specific clinical condition. The law requires, when the AUC program is implemented, that payment be made to the furnishing professional for an applicable advanced diagnostic imaging service only if the claim indicates that the ordering professional consulted with a qualified clinical decision support mechanism (CDSM) as to whether the ordered service adheres to applicable AUC. An “ordering professional” is a physician or practitioner who orders an applicable imaging service. In the Calendar Year 2019 Physician Fee Schedule Final Rule, CMS clarified that “furnishing professional” includes the furnishing facility that provides the advanced diagnostic imaging service. For more information on the AUC program, see CMS’s fact sheet, available here.

Ordering Professionals: Does the AUC Program Apply to You?

- **Advanced diagnostic imaging services:** MRIs, CT scans, SPECT scans and nuclear medicine
  *For the list of CPT codes, see this transmittal from CMS*

- **Applicable settings:** Hospital outpatient departments, emergency departments, ambulatory surgery centers, physician offices and independent diagnostic testing facilities

- **Applicable payment systems:** Physician fee schedule, outpatient prospective payment system, ambulatory surgical center payment systems

- **Reporting to CMS:** Furnishing professionals and facilities must report CDSM consultation information on claims.

- **Information required on claims:** Include the applicable G-codes, modifiers and ordering physician’s NPI

Timeline

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<th>Year</th>
<th>Description</th>
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<td>2018</td>
<td>Starting 1/1/18: Eligible clinicians can earn MIPS credit in the Improvement Activities category for meeting AUC requirements</td>
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<td>2019</td>
<td>7/1/18 – 12/31/19: Voluntary reporting of limited consultation information</td>
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<td>2020</td>
<td>2020: Educational and operations testing year (CMS will pay claims whether or not they correctly include AUC information)</td>
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<td>2021 and beyond: Development of outlier criteria and full implementation of the AUC program</td>
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What You Can Do Now To Prepare

- Determine the impact of the rule on your practice and facility by determining the number of services that will be subject to AUC requirements.
- Review options for qualified CDSM implementation.
- Work with your teams to test, educate and implement CDSMs.
- Develop a communications workflow for advanced diagnostic imaging. (See diagram on reverse.)
- Provide feedback to CMS on operational challenges and barriers.
- Look for additional information on AUC requirements as they are finalized.
*In an emergency department (ED) setting, AUC information would be entered into the patient's EHR, and the furnishing ED would then deliver the service. The claim for the service would then be submitted with the AUC information.