

PAMA

CDSM Requirements

1. **What is taking place? The Protecting Access to Medicare Act (PAMA) of 2014 requires ordering professionals to use a qualified Clinical Decision Support Mechanism (CDSM) when ordering an advanced imaging procedure** to determine if the selected procedure adheres to Appropriate Use Criteria (AUC).

- This requirement applies to four types of advanced imaging and eight clinical priority areas. However, CMS is likely to extend the requirement to all advanced imaging procedures in the future (see below).
- The payment penalty phase will not begin January 1, 2023 even if the PHE for COVID-19 ends in 2022.
- **Until further notice, the educational and operations testing period will continue. CMS is unable to forecast when the payment penalty phase will begin.**
- This requirement is intended to improve patient outcomes, ease overall burden on providers and staff and reduce costs for patients by ensuring imaging orders are appropriate.

2. **What is AdventHealth doing to make it easy?** AdventHealth teams have embedded a CDSM into our Athena, Cerner, and Epic EMRs. That means:

- When an ordering professional, or clinical staff working under the direction of the ordering professional, submits an advanced imaging order, each order will receive an AUC rating: Adhere/Does not adhere to specified applicable AUC.
- The CDSM will automatically issue a suggestion to meet AUC criteria.

3. **What if I do not agree with the suggestion?** The ordering professional, or clinical staff working under the direction of the ordering professional, may add clinical details or override the CDSM suggestion. However, CMS will be tracking this data and providers identified as ordering outliers may be subject to a prior authorization process.

Four Types of Advanced Imaging

- CT
- MR
- PET
- NUCLEAR MED

Eight Clinical Priority Areas

- Coronary artery disease (suspected or diagnosed)
- Suspected pulmonary embolism
- Headache (traumatic or 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