

Protecting Access to Medicare Act (PAMA) Frequently Asked Questions

- **What is PAMA?**

On January 1, 2020, CMS implemented a new mandate – section 218 of Protecting Access to Medicare Act (PAMA) – that changed the prior authorization process for ordering certain advanced diagnostic imaging studies.

Section 218 of PAMA Highlights:

- Establishes the use of Appropriate Use Criteria (AUC) for advanced diagnostic imaging studies. AUC is defined as “criteria that are evidence-based (to the extent feasible) and assist professionals who order and furnish applicable imaging services to make the most appropriate treatment decisions for a specific clinical condition.”
- Covers all CT, MRI, PET, and nuclear medicine tests for:
 - Outpatients
 - Emergency Department patients (exceptions for qualified emergencies)
 - Any patient in observation or outpatient status

When ordering an advanced diagnostic imaging service for a Medicare beneficiary, a provider will be required to consult a qualified Clinical Decision Support Mechanism (CDSM). CDSMs are electronic portals through which appropriate use criteria (AUC) is accessed. The CDSM provides a clinical Decision Support Number (DSN) denoting if the order adheres to the AUC. Providers whose ordering patterns are considered outliers may be subject to prior authorization.

The CDSM will replace the prior authorization process for Medicare patients, is faster, and provides a more specific diagnosis as well as more information on the order.

- **When does PAMA go into effect?**

CMS began auditing January 1, 2020. **The education and testing period for PAMA has now been extended until January 1, 2023.**

- **Which Qualified Clinical Decision Support Mechanisms has Medicare approved (as of June 2019)?**

- AgileMD’s Clinical Decision Support Mechanism
- AIM Specialty Health ProviderPortal®*
- Applied Pathways CURION™ Platform
- Cranberry Peak ezCDS
- eviCore healthcare’s Clinical Decision Support
- EvidenceCare’s Imaging Advisor
- Inveni-QA's Semantic Answers in Medicine™
- MedCurrent OrderWise™
- Medicalis Clinical Decision Support Mechanism
- National Decision Support Company
- National Imaging Associates RadMD
- Reliant Medical Group CDSM
- Sage Health Management Solutions Inc.
- Stanson Health’s Stanson CDS
- Test Appropriate CDSM*

**Free tool available.*

- **Which Clinical Decision Support tool has Munson Healthcare selected?**
Munson Healthcare has chosen CareSelect (National Decision Support Company) as its decision support tool and has implemented it across our system – both in our owned hospitals as well as our owned/affiliated practices/clinics. Providers ordering within a Munson Healthcare hospital have CareSelect as their CDS tool.
- **What should I do if I have an EMR?**
EMRs should have prepared to meet this mandate by embedding a qualified decision support mechanism within their software. Please check with your EMR to see how they will be supporting your office to meet this mandate.
 - **Aria:** Will be implementing CareSelect within the EMR.
 - **eCW:** Will utilize the CareSelect web portal. Education was provided to the employed MHC eCW practices.
- **What can our practice do if our EMR will not be implementing a Qualified Clinical Decision Support Mechanism or our office doesn't have an EMR?**
The qualified CDSMs listed above that have a * noted offer a free web portal version. Please contact them to request a demo.
- **What will happen if we don't provide a decision support number (DSN) at the time of scheduling a radiology test?**
Munson Healthcare is asking that any order for radiology testing (CT, MRI, PET, nuclear medicine) for a Medicare patient include a decision support number.
- **My office uses Physician Web Scheduler (PWS) to schedule outpatient diagnostic imaging studies at Munson Healthcare facilities. Where should I enter the DSN?**
There are specific fields within the questionnaires.
- **Where can I find more information on PAMA?**
 - [CMS Appropriate Use Program](#)
 - [Clinical Decision Support and the ACR Appropriate Use Criteria FAQ](#)