



2016 Issue Brief

Preserve the Ability of Multi-specialty Medical Groups and Other Organized Systems of Care to Provide Advanced Diagnostic Imaging Services

Issue

The in-office ancillary services (IOAS) exception within the physician self-referral (Stark) law permits multi-specialty medical groups and other organized systems of care to deliver high-quality, advanced diagnostic imaging services to Medicare beneficiaries. Over the last ten years, however, several legislative proposals would amend or eliminate the IOAS exception and, consequently, prohibit medical groups from providing advanced diagnostic imaging services to their patients.

Most recently, the White House's Budget for Fiscal Year 2017 included language eliminating advanced diagnostic imaging and other services from the IOAS exception, and on April 28, 2016, H.R. 5088, the Promoting Integrity in Medicare Act (PIMA) of 2016 was introduced. This legislation would amend the Stark self-referral law to limit high-end imaging utilization. PIMA expressly carves out "integrated healthcare delivery systems" from the law's reach, but, this carve out for multi-specialty medical groups is too restrictive and will leave out many AMGA members, including surgical groups.

The passage of such a provision would effectively prohibit multi-specialty medical groups from providing advanced imaging procedures to Medicare beneficiaries. Patients would be forced to receive these services outside of their usual healthcare system and they would lose the advantages inherent in receiving care in a medical group such as:

- use of a uniform medical record contained in an electronic health record system;
- care management protocols incorporating evidence-based medicine; and
- receiving care from a team of providers that interact and collaborate with each other in formulating a plan to best serve the patient.

In short, such proposals would negatively impact the ability of high-quality providers to coordinate and manage the care of their patients. At a time when the federal government is providing incentives to end fragmentation in healthcare, such proposals run counter to the need to stimulate greater integration and care coordination in the delivery system.

AMGA member groups are committed to delivering the right care at the right time and devote significant resources to determining proper usage of advanced diagnostic imaging services in their facilities. Many member groups utilize decision support tools to ensure that clinical decision-making is supported by evidence before ordering advanced imaging for patients. Moreover, patients who live in rural or underserved areas especially would face problems accessing imaging services, and would experience the inconvenience of traveling long distances to receive these services if they could not obtain them where they are usually treated.



Advancing High Performance Health

AMGA Asks Congress to:

Oppose legislation that would eliminate or restrict the ability of multi-specialty medical groups and other organized systems of care to coordinate the care of their patients by limiting their ability to furnish advanced diagnostic imaging services to Medicare beneficiaries in their facilities.