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2019 Issue Brief Preserving Access to Diagnostic Imaging Services in a Medical Group Setting

Issue

The in-office ancillary services (IOAS) exception within the Stark physician self-referral law, drafted 30 years ago, permits multispecialty medical groups and integrated delivery systems to provide high quality, advanced diagnostic imaging services to Medicare beneficiaries. There have been recent proposals that would eliminate advanced diagnostic imaging services from the IOAS exception, effectively prohibiting efficient healthcare delivery systems from providing these services to patients.

If the IOAS exception is repealed, medical group patients would be forced to receive these services outside of their usual healthcare system – losing the fundamental advantages to receiving care in a medical group setting such as:

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

AMGA member medical groups and systems devote considerable resources to determining the proper usage of advanced diagnostic imaging services, including the utilization of decision-support tools to ensure that clinical decision-making is supported by evidence before ordering advanced diagnostic imaging.

Legislative proposals that would eliminate or narrow the scope of the IOAS exception would negatively affect the ability of high-quality providers to coordinate and manage the care of their patients. Furthermore, patients who live in rural or underserved areas could experience the inconvenience of traveling long distances to access these imaging services if they could not obtain them where they are usually treated.

AMGA Asks Congress to:

Protect Medicare beneficiary access to advanced diagnostic imaging services by opposing any legislative effort that would eliminate or limit the ability of multispecialty medical groups and integrated delivery systems to furnish advanced diagnostic imaging services to Medicare beneficiaries in their facilities.