



American Medical Group Association®

2014 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 their patients. Over the last few 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 2015 included language eliminating advanced diagnostic imaging and other "designated health services" from the IOAS exception to the Stark law.

The passage of such a provision would effectively prohibit integrated delivery systems from providing advanced imaging procedures to their patients. Patients would be forced to receive these services outside of their usual health care system, and they would lose the advantages inherent in receiving their care in a medical group such as: use of a uniform medical record contained in an electronic medical 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 from coordinating and managing the care of their patients. At a time when the federal government is providing incentives for health care providers to integrate health care delivery, such as in the Medicare Shared Savings and Pioneer Accountable Care Organization programs, such proposals run counter to Congressional intent to stimulate greater integration and care coordination in the health care 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 rapidly face problems accessing imaging services, and would experience the inconvenience of long travel distances to access these services if they could not obtain them where they are usually treated.

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 their patients in their facilities.