



CMS Releases Final Rule for FY 2024 – Radiological Quality on the Menu

Summary

On August 28, 2023, the Centers for Medicare & Medicaid Services (CMS) final rule for federal fiscal year (FY) 2024 Medicare hospital inpatient prospective payment system (IPPS) and long-term care hospital prospective payment system (LTCH PPS) was published in the Federal Register (the Final CMS 2024 Rule). The Final CMS 2024 Rule updates Medicare fee-for-service payment rates and policies for inpatient hospitals and LTCHs for fiscal year (FY) 2024. CMS is publishing this proposed rule to meet the legal requirements to update Medicare payment policies for IPPS hospitals and LTCHs on an annual basis. The published rulemaking is voluminous (799 pages in the Federal Register, including comments), and addresses many topics, but include several provisions that are very important to imaging.

The Final CMS 2024 Rule adopts three new electronic clinical quality measures (eCQMs) to the list of eCQMs from which hospitals can self-select to meet the eCQM reporting requirements for a given year. One of these is Excessive Radiation Dose or Inadequate Image Quality for Diagnostic Computed Tomography (CT) in Adults (Hospital Level — Inpatient) eCQM, with inclusion in the eCQM measure set beginning with the CY 2025 reporting period/FY 2027 payment determination.

The step CMS has taken is of paramount importance to those of us following imaging and could have a major impact in the industry. First and foremost, it provides a path forward for those in the medical community who have previously raised image quality concerns. Even prior to the Final CMS Rule 2024, many hospitals faced challenges in effectively evaluating image quality.

CMS responded to several concerns raised by the industry including those focused on the noise metric and those focused on vendor implementation. Some of these concerns are addressed in the Comments and Answer sections of Final CMS 2024 Rule. As is frequently the case in this type of rulemaking, some of the responses appear cursory at best. For example, CMS did not adequately address concerns about the metric itself; however, they did state that hospitals could choose any software that generates the data elements. While the rulemaking does set forth minimal guidelines for meeting reporting requirements, best practices call for a much higher bar.

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This is a great opportunity for vendors that are able to both go beyond simply meeting reporting requirements and understand that noise alone is an oversimplification of image quality and is insufficient going forward as a stand-alone data element.

Imalogix is the unrivalled industry leader in image quality assessment, and a pioneer in driving healthcare improvement. Imalogix's comprehensive solution is a cloud-based eco-system that provides actionable insights into a user's radiology department. It not only offers CMS excessive radiation reporting compliance, it also provides healthcare professionals with an array of effective means designed to assess and enhance image quality across a diverse range of parameters. Going above and beyond traditional dose management solutions, Imalogix's evidence-based insights fueled by deep learning algorithms empower hospitals to thoroughly evaluate and optimize performance in vital areas throughout its organization.

Of note in the comments to the Final CMS 2024 Rule are concerns that integrating proprietary software and securely deploying it within existing IT systems (including ensuring compatibility) would place an administrative burden on hospitals as compared with other measures. Imalogix has addressed these concerns through its cutting-edge technology and proprietary platform which has been seamlessly deployed in hospitals and facilities nationwide.

The CMS Final Rule 2024 is poised to have a major impact in the industry in the future as well. It also opens the door to natural extensions - including expanding the excessive radiation dose reporting to physician and hospital outpatient facilities. We applaud all these initiatives. Tools that provide image quality assessment, especially ones that continually meet or exceed CMS' goals for enhanced image quality, are critical steps in providing healthcare providers with invaluable insights enabling improvements in healthcare and healthcare outcomes.