

## CMS PROPOSES NEW QUALITY MEASURE

The Centers for Medicare and Medicaid Services (CMS) is proposing a new quality measure that would apply both to physicians and hospitals.

### *Excessive Radiation Dose or Inadequate Image Quality for Diagnostic Computed Tomography (CT) in Adults*

This measure provides a standardized method for monitoring the performance of diagnostic CT to discourage unnecessarily high radiation doses, a risk factor for cancer, while preserving image quality. It is expressed as a percentage of CT exams that are out-of-range based on having either excessive radiation dose or inadequate image quality relative to evidence-based thresholds based on the clinical indication for the exam. This electronic Clinical Quality Measure (eCQM) requires the use of additional software to access primary data elements stored within radiology electronic health records and translate them into data elements that can be ingested by this eCQM.

AAPM has serious concerns with the proposed quality measure. AAPM provided written comments to CMS in June 2023 when this measure was included in the Medicare Hospital Inpatient Prospective Payment System proposed rule for fiscal year 2024, which begins October 1, 2023. This position stems from seven major concerns about the proposed measure:

- Unscientific characterization of CT scan risk.
- Inactionability of the measure to enable targeted change to improve practice.
- Inadequate addressing of the complexity of CT categorization.
- Inadequate assessment of noise.
- Inadequate assessment of image quality.
- Emphasis on dose reduction instead of dose optimization.
- Limited expertise and experience of the company suggested to steward this measure.

For physicians, CMS is proposing the new Merit-based Incentive Payment System (MIPS) quality measure beginning with the calendar year (CY) 2024 performance period on January 1, 2024 to determine MIPS payments in 2026.

For hospital outpatient departments, the proposed measure begins with a voluntary reporting period beginning in CY 2025 and mandatory reporting beginning with the CY 2026 reporting period for CY 2028 payment determination.

AAPM will be provided comments to CMS prior to the September 11<sup>th</sup> comment deadline.