mCODE & ASCO Policy

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ASCO Policy

Goals

• Interoperability
  § Improved patient care, safety
  § Burden reduction
  § Patient access

• Incorporation of mCODE into EHRs
  § USCDI
  § Use Cases, Pilots

• mCODE in registries, trials, prior authorization, quality measures
  § CodeX Use Cases
The Regulatory Process

- Request for Information, RFI ("informal")
- Advance Notice of Proposed Rulemaking (ANPRM; "formal")
  - Notice
  - Proposed Rule
  - *(Public submits comments)*
  - Interim Final Rule
  - Final Rule
  - Implementation, extensions, delays, withdrawals
- Congressional override (rare)
- Litigation
  - Surprise billing, ACA, MFN, 340B
Rules Can Be…

Annual (existing law)

• Medicare Physician Fee Schedule (the “physician payment” rule)
• Hospital Outpatient Prospective Payment System, OPPS (the “hospital outpatient” rule)
• Inpatient Prospective Payment System, IPPS (the “inpatient” rule)

Ad Hoc / New Law

• ONC’s “Information Blocking” rule
• “Surprise Billing”
• Telehealth during COVID-19
Making Our Voices Heard

• Support mCODE submission to USCDI
  ▪ Directly: Letters, comments on site

• Comment letters, RFIs
  ▪ Every opportunity, every agency
  ▪ Highlight CodeX use cases, mCODE
  ▪ Support for SDOH/Gravity Project

• Meetings with ONC, CMS
Some Medicare Advantage Organization Denials of Prior Authorization Requests Raise Concerns About Beneficiary Access to Medically Necessary Care

House passes bill to install electronic prior authorization in Medicare Advantage plans
Quality Measures

- ASCO Quality Programs, Value-based Programs
- QPP (MIPS & APMs), Other Payers
- NEW: Enhancing Oncology Model, Oncology MVP

**Quality Measures**

Create a solution that demonstrates the ability to author and evaluate digital quality measures using the FHIR data model and mCODE, where applicable, for value-based programs and clinical quality improvement in the oncology domain.

**ON TRACK** Preparing project materials to support transition from Pre-Discovery to Discovery. Focusing efforts on:

1. New member orientation
2. Discussing what moving to the Discovery Stage entails
3. Reviewing the Use Case Development Guidelines page for next steps

**COMPLETE** CodeX Quality Measures Proposal approved by CodeX Steering Committee and use case officially moved to the Discovery Stage
“Over the past five years, Dr. Bertagnolli has championed collaborative initiatives to transform the data infrastructure for clinical research and is the founding chair of the minimal Common Oncology Data Elements (mCODE) executive committee.”