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DISCLAIMER

This Molina Clinical Policy (MCP) is intended to facilitate the Utilization Management process. Policies are not a supplementation or recommendation for treatment; Providers are solely responsible for the diagnosis, treatment and clinical recommendations for the Member. It expresses Molina's determination as to whether certain services or supplies are medically necessary, experimental, investigational, or cosmetic for purposes of determining appropriateness of payment. The conclusion that a particular service or supply is medically necessary does not constitute a representation or warranty that this service or supply is covered (e.g., will be paid for by Molina) for a particular Member. The Member's benefit plan determines coverage – each benefit plan defines which services are covered, which are excluded, and which are subject to dollar caps or other limits. Members and their Providers will need to consult the Member's benefit plan to determine if there are any exclusion(s) or other benefit limitations applicable to this service or supply. If there is a discrepancy between this policy and a Member's plan of benefits, the benefits plan will govern. In addition, coverage may be mandated by applicable legal requirements of a State, the Federal government or CMS for Medicare and Medicaid Members. CMS's Coverage Database can be found on the CMS website. The coverage directive(s) and criteria from an existing National Coverage Determination (NCD) or Local Coverage Determination (LCD) will supersede the contents of this MCP and provide the directive for all Medicare members. References included were accurate at the time of policy approval and publication.

OVERVIEW

Three-dimensional images (3D reconstruction or 3D rendering) are a distinct diagnostic procedure that describes a separate procedure or process that can be applied to computed tomography (CT), magnetic resonance imaging (MRI), ultrasound or other tomographic modalities. The availability of 3D images enables the provider interpreting the images to have a view of the patient's entire anatomy; the original two-dimensional (2D) images provide comparison and confirmation. An image is reconstructed by using multiple thin-section (typically axial) images. The images can then be manipulated and rotated into various views to better understand the relationship of one structure to another. In addition, it provides a view of the structure along its length as opposed to just on a single trans-axial image. The shading, coloring, and perspective of a 3D volume rendering is useful in surgical planning as well as for identifying critical areas for avoidance or targeting. Applications of this technology include visualization of central nervous system vasculature, coronary artery imaging, enhanced imaging of the thorax to include embolic disease, inflammatory and neoplastic lesions, imaging of facial malformations, complex facial fractures/trauma, aortic aneurysms and multiple others. (Stark, 2022; Jin et al., 2012; Calboun et al., 1999).

The physician supervises and/or creates the 3D reconstructions and adjust the projection to optimize visualization of anatomy or pathology for the 3D reconstruction performed on an independent workstation and the physician will discuss with the technologist the need for 3D imaging and supervise the technologist in creating 3D images for studies not requiring image post-processing on an independent workstation. The 3D rendering codes are intended to address complex renderings such as shaded surface rendering, volumetric rendering, maximum intensity projections, fusion of images from other modalities, and quantitative analysis (segmental volumes and surgical planning). (Stark, 2022; Jin et al., 2012; Calboun et al., 1999).

COVERAGE POLICY

- Three dimensional (3D) rendering of CT or MRI requiring image post processing on an independent workstation (CPT code 76377) may be considered medically necessary under the following circumstances (Duran et al., 2019; Cook et al., 2018):
 - a. When the information to be obtained from the test cannot be provided by another procedure (MRI, ultrasound, angiography, etc.); **OR**
 - b. When the information could not be provided by a standard 2D CT scan without reconstruction; AND
 - c. For preoperative planning in **ANY** of the following clinical circumstances:
 - Brain tumors target volume assessment for sterotactic, gamma knife or cyberknife radiosurgery (Taranda & Turcan, 2021); OR
 - Congenital cardiac/cardiovascular anomalies including PDA, vascular rings (Eren et al., 2014); OR
 - Congenital skull abnormalities (e.g., craniosynostosis) in infants and children (Bamba et al., 2011; Li et al., 2010; Thompson et al., 2007); OR
 - Complex craniofacial reconstructive surgery and including facial fractures (Plooij et al., 2011; Kim et al.,

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- 2010; Li et al., 2010; Pérez et al. 2010; Kwon et al., 2009; Thompson et al., 2007); OR
- Complex fractures, especially those extending intra-articularly (Bryson et al., 2021; Smitaman & Davis, 2022; Naraghi & White, 2012); OR
- Complex pelvic joint fractures (Lee et al., 2011; Nakao et al., 2010; Yuan et al., 2008; Thompson et al., 2007); OR
- Complex spine fractures (Lin et al., 2011; Thompson et al., 2007; Fatterpeckar et al., 2006; Dallessio, 2005); OR
- Complex upper and lower extremity joint fractures; OR
- Craniocervical abnormalities (Jack et al., 2010; Li et al., 2010); OR
- Endovascular intervention for aneurysms (White et al., 2021); OR
- Hepatic tumors for targeted radiotherapy or radioembolization (Haberman et al., 2022); OR
- HIFU (High Intensity Focused Ultrasound) ablation of tumors of prostate, liver, pancreas and uterine fibroids; OR
- Maxillofacial tumors or congenital anomalies (Walters et al., 2013); OR
- Scoliosis surgery (Li et al., 2010; Fatterpeckar et al., 2006)
- Spinal canal or osseous spinal tumor radiotherapy planning (Noguerol et al., 2020); OR
- Temporal bone procedures involving semicirular canals or cochlear (Ciodaro et al., 2019); OR
- Tumors for planned radiofrequency, microwave, or other thermal ablation; OR
- Vascular stents and grafts (Fishman et al., 2006; Sun, 2006).
- 2. CPT code 76376 (3D rendering not requiring image post-processing on an independent workstation) should not be separately reimbursed since this function is built into the imaging software and generally takes less than 15 minutes to perform. (Jin et al., 2012; Calboun et al., 1999).
- 3. The 3D imaging service must be clearly described as a separate documentation in the radiology report and submitted for review.
- 4. 3D rendering with interpretation and reporting of ultrasound, or other tomographic modality*; requiring image post processing on an independent workstation (CPT code 76377) **may be considered medically necessary** when conventional 2D scanning does not provide a definitive answer for any of the following conditions:
 - Confirmation of a suspected interstitial or cornual ectopic gestation; OR
 - Distinguish septate from bicornuate uterus (only the former is treated with hysteroscopic resection); OR
 - Malpositioned IUD or assessment of Essure devices.

*Note: No prior authorization is necessary

(ACR, 2022; AMR, 2012; Baumert et al., 2009)

Limitations and Exclusions

The following services are excluded and not covered:

- 1. 3D rendering (CPT codes 76376 and 76377) is considered an inherent component cannot be reported with **ANY** of the following procedures (AMR, 2012; Baumert et al., 2009):
 - a. Bronchoscopy (CPT code 31627)
 - b. Computed tomographic angiography (CTA) of the head, neck, chest, pelvis, upper and lower extremity, abdomen, and abdominal aorta, and bilateral ileofemoral lower extremity vessels (CPT codes 70496-70498, 71275, 72191, 73206, 73706, 74174, 74175, 75635)
 - c. Magnetic resonance angiography (MRA) of the head, neck, chest, spinal canal, pelvis, upper and lower extremities, and abdomen (CPT codes 70544-70549, 71555, 72159, 72198, 73225, 73725, 74185)
 - d. Nuclear Radiology (CPT codes 78012-78999)
 - e. Computed tomographic (CT) colonography (virtual colonoscopy) (CPT codes 74261-74263)
 - f. Cardiac MRI includes (CPT codes 75557-75565)
 - g. Computed tomography (CT) heart and (CTA) heart, coronary arteries and bypass grafts (CPT codes 70496, 70498, 71275, 72191, 73206, 73706, 74174-74175, 74261-74263, 75571-75574, 75635)
 - h. Computer-aided detection (CPT codes 77048-77049)

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- i. Provider planning of a patient-specific fenestrated visceral aortic endograft requiring a minimum of 90 minutes of Provider time (CPT code 34839)
- j. Echocardiography, transesophageal (TEE) for guidance of a transcatheter intracardiac or great vessel(s) structural intervention(s) (CPT code 93355)
- k. Digital breast tomosynthesis (DBT) (CPT codes 77061-77063)
- 2. Mapping of hippocampal atrophy in Alzheimer's disease due to insufficient evidence in the peer reviewed medical literature (Chow et al., 2015; Wippold et al., 2015; Apostolova et al., 2010; Gogtay et al., 2010; Jack et al., 2010).
- 3. 3D rendering not requiring image post-processing on an independent workstation (CPT 76376) should not be separately reimbursed, as this function is built into the imaging software and generally takes less than 15 minutes to perform (Jin et al., 2012; Calboun et al., 1999).

DOCUMENTATION REQUIREMENTS. Molina Healthcare reserves the right to require that additional documentation be made available as part of its coverage determination; quality improvement; and fraud; waste and abuse prevention processes. Documentation required may include, but is not limited to, patient records, test results and credentials of the provider ordering or performing a drug or service. Molina Healthcare may deny reimbursement or take additional appropriate action if the documentation provided does not support the initial determination that the drugs or services were medically necessary, not investigational or experimental, and otherwise within the scope of benefits afforded to the member, and/or the documentation demonstrates a pattern of billing or other practice that is inappropriate or excessive.

SUMMARY OF MEDICAL EVIDENCE

For peer-reviewed studies used in the development and update of this policy, please see the *Reference* section.

National and Specialty Organizations

In 2022, the American College of Radiology (ACR) in collaboration with the Association of Physicists in Medicine (AAPM), Society for Imaging Informatics in Medicine (SIIM), and Society for Pediatric Radiology (SPR) published the ACR-AAPM-SIIM-SPR Practice Parameter for Digital Radiography. The document offers guidance on the clinical use of digital radiography (DR) equipment (excluding mammography) to provide necessary image quality at a suitable radiation dose as well as provide excellent safety and care for patients undergoing digital radiography examinations.

The ACR (¹2022) also published the *ACR Practice Parameter for Performing and Interpreting Magnetic Resonance Imaging (MRI)*. Guidance is provided on indications and contraindications for MRI, provider qualifications to perform MRI, specifications of the examination, proper documentation, equipment specifications, and safety guidelines. A section regarding quality control and improvement is also included with information on safety, infection control, and patient education.

Currently no ACR Appropriateness Criteria is available specific to 3D interpretation and reporting of imaging studies.

The ACR (2021) published a bulletin titled *Seeing in 3D* which discusses the joint ACR and Radiological Society of North America (RSNA) 3DP Registry. The registry was developed to track clinical 3DP performed at the point of care. By collecting anonymized 3DP case information, patient care is improved and allows a view of how resources are utilized including the tracking of clinical outcomes, facilitate quality improvement, and examine 3DP reimbursement. This allows users to compare their workflow processes with others who have joined the 3DP Registry. The registry will aid providers with quality improvement and support reimbursement. Currently four Category III reimbursement codes exist for 3DP. By collecting data and literature, the goal is to support the creation of Category I codes related to reimbursement from third-party payers (including CMS). (RSNA, 2022).

In February 2022, the ACR (2 2022) submitted comments to the United States Food and Drug Administration (FDA) with respect to the discussion paper *3D Printing Medical Devices at the Point of Care* ($^{1-2}$ FDA, 2022). An announcement is pending from the FDA. The ACR recommendations include:

- Designation of anatomic models created by end-user health care facilities (HCFs) as very low risk.
- Exercise enforcement discretion with respect to very low-risk devices created by end-user HCFs.
- Discontinue use of the term "point of care" for describing 3D printing within HCFs.

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CODING & BILLING INFORMATION

CPT Codes

CPT	Description
76376	3D rendering with interpretation and reporting of computed tomography, magnetic resonance imaging,
	ultrasound, or other tomographic modality with image postprocessing under concurrent supervision; not
	requiring image postprocessing on an independent workstation
76377	3D rendering with interpretation and reporting of computed tomography, magnetic resonance imaging,
	ultrasound, or other tomographic modality with image postprocessing under concurrent supervision; requiring
	image postprocessing on an independent workstation

HCPCS Codes - N/A

CODING DISCLAIMER. Codes listed in this policy are for reference purposes only and may not be all-inclusive. Deleted codes and codes which are not effective at the time the service is rendered may not be eligible for reimbursement. Listing of a service or device code in this policy does not guarantee coverage. Coverage is determined by the benefit document. Molina adheres to Current Procedural Terminology (CPT®), a registered trademark of the American Medical Association (AMA). All CPT codes and descriptions are copyrighted by the AMA; this information is included for informational purposes only. Providers and facilities are expected to utilize industry standard coding practices for all submissions. When improper billing and coding is not followed, Molina has the right to reject/deny the claim and recover claim payment(s). Due to changing industry practices, Molina reserves the right to revise this policy as needed.

APPROVAL HISTORY

2/8/2023	Policy reviewed, included additional indications in the Coverage Policy section – brain tumors, congenital cardiac/cardiovascular anomalies; complex fractures (especially those extending intra-articularly); endovascular intervention for aneurysms; hepatic tumors for targeted radiotherapy or radioembolization; High Intensity Focused Ultrasound ablation of tumors of prostate, liver, pancreas and uterine fibroids; maxillofacial tumors or congenital anomalies; spinal canal or osseous spinal tumor radiotherapy planning; temporal bone procedures involving semicirular canals or cochlear; tumors for planned radiofrequency, microwave, or other thermal ablation; and vascular stents and grafts.
12/14/2022 12/8/2021 Reviewed Revised 12/12/2012	Policy reviewed, no changes to criteria; updated Overview and Reference sections; added Summary of Medical Evidence section. Policy reviewed, no changes, updated references. 12/16/2015, 8/9/2016, 9/19/2017, 12/13/2018, 12/10/2019, 12/9/2020 2/12/2015, 8/9/2016, 11/6/2018 New policy.

REFERENCES

Government Agencies

- Centers for Medicare and Medicaid Services (CMS). Medicare coverage database (search: 3D interpretation and reporting of imaging studies). Available from CMS. Accessed January 19, 2023.
- Centers for Medicare and Medicaid Services (CMS). Medicare coverage database. Local coverage determination 3D interpretation and reporting of imaging studies (L33256). Available from CMS. Effective Date October 1, 2015. Accessed January 19, 2023.
- Centers for Medicare and Medicaid Services (CMS). Medicare coverage database. Local coverage determination 3D interpretation and reporting of imaging studies (L35408). Available from CMS. Effective Date October 1, 2015. Accessed January 19, 2023.
- Centers for Medicare and Medicaid Services (CMS). Medicare national correct coding initiative (NCCI) edits. Available from <u>CMS</u>. Updated September 8, 2022. Accessed January 19, 2023.
- United States Food and Drug Administration (FDA). Article: 3D printing medical devices at the point of care discussion paper. Available from <u>FDA</u>. Published December 10, 2021. Accessed January 19, 2023.
- 2 United States Food and Drug Administration (FDA). Discussion paper: 3D printing medical devices at the point of care. Available from <u>FDA</u>. Published December 10, 2021. Accessed January 19, 2023.

Evidence Based Reviews and Publications

- AMR Peer Review. Policy reviewed on February 1, 2023 by an Advanced Medical Reviews (AMR) practicing, board-certified physician in the areas
 of Radiology.
- Stark P. Principles of computed tomography of the chest. Available from <u>UpToDate</u>. Updated September 20, 2022. Accessed January 19, 2023. Registration and login required.

National and Specialty Organizations

- 1. American College of Radiology (ACR). ACR bulletin: Seeing in 3D. Available from ACR. Published October 28, 2021.
- American College of Radiology (ACR). ACR practice parameter for performing and interpreting magnetic resonance imaging (MRI). Available from <u>ACR</u>. Updated 2022. Accessed January 19, 2023.

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- American College of Radiology (ACR). ACR provides recommendations to FDA regarding 3D printing within healthcare facilities. Available from <u>ACR</u>. Published February 09, 2022. Accessed January 19, 2023.
- American College of Radiology (ACR). ACR radiology coding source™. Available from ACR. Updated 2022. Accessed January 19, 2023.
- American College of Radiology (ACR), Association of Physicists in Medicine (AAPM), Society for Imaging Informatics in Medicine (SIIM), Society for Pediatric Radiology (SPR). ACR-AAPM-SIIM-SPR practice parameter for digital radiography. Available from <u>ACR</u>. Updated 2022. Accessed January 19, 2023.
- Radiological Society of North America (RSNA). RSNA-ACR 3D printing registry. Available from RSNA. Accessed January 19, 2023.

Peer Reviewed Publications

- Alshammery FA. Three-dimensional (3D) imaging techniques in orthodontics an update. J Family Med Prim Care. 2020 Jun 30;9(6):2626-2630. doi: 10.4103/jfmpc.jfmpc 64 20. PMID: 32984098. PMCID: PMC7491840.
- Baumgarten KM, Radtke L. The accuracy of three-dimensional CT scan software in predicting prosthetic utilization in total shoulder arthroplasty. J Am Acad Orthop Surg. 2022 Jan 15;30(2):e223-e232. doi: 10.5435/JAAOS-D-21-00641. PMID: 34613949.
- Bryson WN, Fischer EJ, Jennings JW, Hillen TJ, Friedman MV, Baker JC. Three-column classification system for tibial plateau fractures: What the
 orthopedic surgeon wants to know. Radiographics. 2021 Jan-Feb;41(1):144-155. doi: 10.1148/rg.2021200106. PMID: 33275542.
- Ciodaro F, Freni F, Mannella VK, Gazia F, Maceri A, Bruno R, et al. Use of 3D volume rendering based on high-resolution computed tomography temporal bone in patients with cochlear implants. Am J Case Rep. 2019 Feb 12;20:184-188. doi: 10.12659/AJCR.914514. PMID: 30745558. PMCID: PMC6380206.
- 5. Cook TS, Steingall SJ, Steingall SR, Boonn WW. Establishing and running a three-dimensional and advanced imaging laboratory. Radiographics. 2018 Oct;38(6):1799-1809. doi: 10.1148/rg.2018180058. PMID: 30303782.
- Deng F, Mu C, Yang L, Yi R, Gu M, Li K. The differentiation in image post-processing and 3D reconstruction during evaluation of carotid plaques from MR and CT data sources. Front Physiol. 2021 Apr 16;12:645438. doi: 10.3389/fphys.2021.645438. PMID: 33935800. PMCID: PMC8085352.
- Duran AH, Munevver N, Masood I, Maciolek LM, Hussain H. The additional diagnostic value of three-dimensional volume rendering imaging in routine radiology practice. Cureus. 2019 Sep 5;11(9):e5579. doi: 10.7759/cureus.5579. PMID: 31695998. PMCID: PMC6820665.
- Durnea CM, Siddiqi S, Nazarian D, Munneke G, Sedgwick PM, Doumouchtsis SK. 3D-volume rendering of the pelvis with emphasis on paraurethral structures based on MRI scans and comparisons between 3D slicer and OsiriX®. J Med Syst. 2021 Jan 20;45(3):27. doi: 10.1007/s10916-020-01695-3. PMID: 33469726. PMCID: PMC7815623.
- Durutović O, Filipović A, Milićević K, Somani B, Emiliani E, Skolarikos A, Janković MM. 3D imaging segmentation and 3D rendering process for a precise puncture strategy during PCNL - a pilot study. Front Surg. 2022 May 3;9:891596. doi: 10.3389/fsurg.2022.891596. PMID: 35592119. PMCID: PMC9110964.
- Eren S, Kantarci M, Pirimoglu B, Cakir M, Ogul H. Type A interrupted aortic arch accompanied by intracranial aneurysms causing subarachnoid hemorrhage in an adult man. Clin Imaging. 2014 Jan-Feb;38(1):60-2. doi: 10.1016/j.clinimag.2013.05.012. PMID: 24094829.
- Fishman EK, Ney DR, Heath DG, Corl FM, Horton KM, Johnson PT. Volume rendering versus maximum intensity projection in CT angiography: What works best, when, and why. Radiographics. 2006 May-Jun;26(3):905-22. doi: 10.1148/rg.263055186. PMID: 16702462.
- Giudice Al, Ronsivalle V, Gastaldi G, Leonardi R. Assessment of the accuracy of imaging software for 3D rendering of the upper airway, usable in orthodontic and craniofacial clinical settings. Prog Orthod. 2022 Jun 13;23(1):22. doi: 10.1186/s40510-022-00413-8. PMID: 35691961. PMCID: PMC9189077.
- Haberman DM, Andriani OC, Segaran NL, Volpacchio MM, Micheli ML, Russi RH, Pérez Fernández IA. Role of CT in two-stage liver surgery. Radiographics. 2022 Jan-Feb;42(1):106-124. doi: 10.1148/rg.210067. PMID: 34990325.
- Irtan S, Hervieux E, Boutroux H, Becmeur F, Ducou-le-Pointe H, Leverger G, Audry G. Preoperative 3D reconstruction images for paediatric tumours: Advantages and drawbacks. Pediatr Blood Cancer. 2021 Jan;68(1):e28670. doi: 10.1002/pbc.28670. PMID: 32827349.
- 15. Joseph ŠS, Dennisan A. Three-dimensional reconstruction models for medical modalities: A comprehensive investigation and analysis. Curr Med Imaging. 2020;16(6):653-668. doi: 10.2174/1573405615666190124165855. PMID: 32723236.
- Li S, Rokohl AC, Guo Y, Heindl LM. 2D photos are great, but what about 3D imaging? Graefes Arch Clin Exp Ophthalmol. 2022 May;260(5):1799-1800. doi: 10.1007/s00417-021-05479-4. PMID: 34716811. PMCID: PMC9007754.
- Mertzanidou T, Hipwell JH, Reis S, Hawkes DJ, Bejnordi BE, Dalmis M, et al. 3D volume reconstruction from serial breast specimen radiographs for mapping between histology and 3D whole specimen imaging. Med Phys. 2017 Mar;44(3):935-948. doi: 10.1002/mp.12077. PMID: 28064435. PMCID: PMC6849622.
- Naraghi A, White LM. Three-dimensional MRI of the musculoskeletal system. AJR Am J Roentgenol. 2012 Sep;199(3):W283-93. doi: 10.2214/AJR.12.9099. PMID: 22915419.
- Noguerol TM, Barousse R, Amrhein TJ, Royuela-Del-Val J, Montesinos P, Luna A. Optimizing diffusion-tensor imaging acquisition for spinal cord assessment: Physical Basis and technical adjustments. Radiographics. 2020 Mar-Apr;40(2):403-427. doi: 10.1148/rg.2020190058. PMID: 32125961.
- Smitaman EE, Davis M. Hindfoot fractures: Injury patterns and relevant imaging findings. Radiographics. 2022 May-Jun;42(3):661-682. doi: 10.1148/rg.210167. PMID: 35275783.
- Sun Z. Three-dimensional visualization of suprarenal aortic stent-grafts: Evaluation of migration in midterm follow-up. J Endovasc Ther. 2006 Feb;13(1):85-93. doi: 10.1583/05-1648.1. PMID: 16445328.
- Taranda J, Turcan S. 3D whole-brain imaging approaches to study brain tumors. Cancers (Basel). 2021 Apr 15;13(8):1897. doi: 10.3390/cancers13081897. PMID: 33920839. PMCID: PMC8071100.
- 23. van Ineveld RL, van Vliet EJ, Wehrens EJ, Alieva M, Rios AC. 3D imaging for driving cancer discovery. EMBO J. 2022 May 16;41(10):e109675. doi: 10.15252/embj.2021109675. PMID: 35403737. PMCID: PMC9108604.
- 24. Walters M, Claes P, Kakulas E, Clement JG. Robust and regional 3D facial asymmetry assessment in hemimandibular hyperplasia and hemimandibular elongation anomalies. Int J Oral Maxillofac Surg. 2013 Jan;42(1):36-42. doi: 10.1016/j.ijom.2012.05.021. PMID: 22749574.
- White RD, Thomas WR, Salahia MG, Thomas WR, Gordon AC, Williams IM, et al. Renal arteries revisited: Anatomy, pathologic entities, and implications for endovascular management. Radiographics. 2021 May-Jun;41(3):909-928. doi: 10.1148/rg.2021200162. PMID: 33939544.
- Xin D, Lei L. Diagnostic value of magnetic resonance imaging scan, multi-slice spiral computed tomography three-dimensional reconstruction combined with plain film x-ray in spinal injuries. Contrast Media Mol Imaging. 2022 May 16;2022:8998231. doi: 10.1155/2022/8998231. PMID: 35655726. PMCID: PMC9126705.

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APPENDIX

Reserved for State specific information. Information includes, but is not limited to, State contract language, Medicaid criteria and other mandated criteria.