

ADVANCED DIAGNOSTIC IMAGING ACCREDITATION DEADLINE - JANUARY 1, 2012

EXECUTIVE SUMMARY.

Section 135(a) of the Medicare Improvements for Patients and Providers Act of 2008 ("MIPPA") amended the Social Security Act to require suppliers of the technical component ("TC") of "advanced diagnostic imaging services" paid under the Medicare Physician Fee Schedule ("MPFS") to become accredited by January 1, 2012. Suppliers not fully accredited by the deadline will not be reimbursed for the TC of the advanced diagnostic imaging services they furnish. Therefore, suppliers not yet accredited must begin the accreditation process now to avoid any lapse in reimbursement.

DETAILS.

Who and What is Subject to Accreditation? The MIPPA accreditation requirements apply to physicians, non-physician practitioners and independent diagnostic testing facilities ("IDTF") furnishing diagnostic magnetic resonance imaging ("MRI"), computed tomography ("CT") and nuclear medicine imaging such as positron emission tomography ("PET") to Medicare beneficiaries. The accreditation requirements do not apply to x-ray, ultrasound, fluoroscopy procedures or diagnostic and screening mammography. Hospital outpatient departments are excluded from the accreditation requirements because they do not bill under the MPFS. Further, the accreditation requirement only applies to the suppliers of the images and not to the professional interpretation of the images.

Designation of Accreditation Organizations. On January 26, 2010, CMS published a notice announcing the selection of three national accreditation organizations to accredit suppliers of advanced diagnostic imaging services: the American College of Radiology, the Intersocietal Accreditation Commission and The Joint Commission.







Accreditation Standards. The MIPPA requires the designated accreditation organizations to include certain standards in the accreditation process. These include:

- Standards for the qualifications of non-physician medical personnel furnishing imaging services;
- Standards for the qualifications and responsibilities of medical directors and supervising physicians;
- Procedures to ensure all equipment meets performance specifications;
- Safety standards that apply to staff and patients; and
- Quality assurance and quality control program standards to ensure the reliability and accuracy of the technical quality of diagnostic images produced.

PRACTICAL CONSIDERATIONS.

The accreditation deadline is less than six months away. Suppliers subject to the requirements must act quickly to choose an accrediting body and initiate the process in order to avoid possible loss of imaging revenues. Extra time may be needed to meet the particular criteria of the supplier's designated accreditation organization as the MIPPA did not establish a standard accreditation program.

If you have any questions or would like additional information about this topic, please contact your regular Hall Render attorney or:

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