

Accreditation Required for Advanced Diagnostic Imaging Suppliers

Physicians, non-physician practitioners, and Independent Diagnostic Testing Facilities ("IDTF") that perform certain advanced diagnostic imaging services (the "Suppliers"), such as magnetic resonance imaging ("MRI"), computed tomography ("CT"), and nuclear medicine imaging (including positron emission tomography) (collectively, the "ADI") must be accredited by January 1, 2012 in order to submit claims to Medicare for the technical component of such ADI. This requirement does not apply to physicians or facilities that provide x-ray, fluoroscopy, ultrasound or diagnostic mammography in connection with the Mammography Quality Standards Act. In addition, hospitals, as well as physicians who interpret the diagnostic images but do not perform the technical component, are exempt from this requirement. An IDTF that uses an accredited mobile facility and bills for the technical component of the ADI services set forth above must also be accredited.

After January 1, 2012, Suppliers (as such term is defined above) of the technical component of ADI that seek to enroll in Medicare for the first time must be accredited by one of three organizations approved by CMS at the time of application in order to be accepted into the Medicare program. The three CMS-approved accrediting organizations are the Joint Commission, the American College of Radiology, and the Intersocietal Accreditation Commission (the "Approved Accrediting Organizations"). Suppliers who are currently enrolled in Medicare and accredited by one of the Approved Accrediting Organizations are not required to take any action. Rather, the Approved Accrediting Organization will alert Medicare directly.

Those Suppliers that seek to become accredited should contact one of the Approved Accrediting Organizations directly, as each organization has varying quality standards. Accordingly, it is advisable that Suppliers review the accreditation standards for each Approved Accrediting Organization in order to determine the accreditation process that best fits the Supplier's business needs. A Supplier must secure accreditation for each modality that it supplies. The accreditation process may take up to five (5) months and may involve unannounced site visits by representatives from the Approved Accrediting Organization.

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For more information on the accreditation process and requirements, as well as the contact information for the CMS Approved Organizations, please feel free to contact a Garfunkel Wild, P.C. attorney.

About Garfunkel Wild, P.C.

Garfunkel Wild, P.C. was founded in 1980 with a single purpose in mind: to become a pre-eminent health care law firm attending to the unique business and legal needs of its clients. Since then, the firm has grown to over 70 attorneys devoted to addressing the complex legal, regulatory, business and financial needs of its diverse clients.

If you have any questions regarding this Legal Alert, please contact Patrick J. Monahan II, Esq. at (203) 316-0483.

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