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MIPPA: Are you Accredited Yet?

By Deborah Abrams Kaplan | May 16, 2011

On the first day of 2012, private outpatient imaging centers providing MRI, CT, PET exams and nuclear medicine procedures will need accreditation for Medicare to reimburse for the technical component under Part B of the Medicare Physician Fee Schedule, as required by the Medicare Improvements for Patients and Providers Act (MIPPA).

Are providers ready?

We asked the three designated accreditation agencies: Joint Commission, the American College of Radiology (ACR), and the Intersocietal Accreditation Commission (IAC).

Joint Commission

Michael Kulczycki, Executive Director of the Ambulatory Care Accreditation Program at the Joint Commission said that all the accreditation agencies met with CMS in April. "At that time, CMS was suggesting that there were less than 1,500 that were not yet accredited, out of maybe 8,000 or more." He thought that CMS was pleased with the progress made so far.

Kulczycki said that CMS has been firm about the date of January 1, 2012 being the date required for accreditation, not the "applied by" date. "CMS has said all along, it's about having the final accreditation - if it's not available, the organization can still do the imaging studies, but they won't be reimbursed (by CMS)," he said.

The Joint Commission recommends that imaging centers apply by July 1, to make sure that the accreditation process has time to run its course. "All the accrediting bodies have suggested to apply by July," he said, noting that each organization has a different length of time it takes for the process. As for the Joint Commission, "we have to make sure the application is complete, schedule and conduct an on-site evaluation, and typically some post-survey work needs to be done before accreditation is awarded."

As for choosing an accreditation organization, he said that one reason organizations would use the Joint Commission is if they have multiple modalities and multiple sites. "We have a single application that applies across the entity, a single survey process," he said. Kulczycki said that it becomes more cost-effective for an organization fitting that model, to use the Joint Commission. He also said the Joint

Commission has a holistic approach, looking not only at patient safety, but staff safety and the physical plant as well.

ACR

While the ACR was not able to provide statistics for how many centers they have accredited to date or expect to accredit, “we feel that providers are taking the Medicare mandate seriously,” said Shawn Farley, Director of Public Affairs for the ACR. “However, facilities may need to move at a faster pace to start the process to meet the January 1, 2012 deadline.”

The ACR recommends they start the process no later than June 30, “but that’s not a hard and fast end date.” He said that if a facility has all the necessary materials and are organized going into the process, it will go more smoothly and quickly, especially if they use the ACRedit online accreditation application.

Farley encourages facilities to look into the ACR program. “The college is the oldest and most widely recognized radiology accrediting body,” he said. “It is the only accrediting process created by and carried out by radiologists and medical physicists. Aside from meeting the Medicare standard, the ACR process is peer-reviewed, continuous practice improvement that ultimately helps them provide better patient care.”

IAC

While the IAC also provided no hard numbers, they have experienced a marked increase in the number of facilities seeking accreditation. However, “it is clear that there remain many that need to get started with the process,” said Tammie Sloper, Director of Marketing for the IAC.

The IAC also recommends that providers apply by this summer to be sure they get accredited by January, but note that their online applications and review process is efficient and ongoing.

When researching which accreditation agency to use, Sloper notes that there are distinct differences between the three designated accrediting organizations. She said that facilities should research the standards, application process, fee structure (and discounts for multiple sites), review process and resources offered by each to find the best fit for their organization. In addition to looking at the agency’s level of customer service, they should also ask whether they would need a phantom, whether a physicist would need to be involved, and whether there are fees when the agency delays accreditation and requests additional materials.

All three organizations stress that they want to help providers through the process. See the links below for more information on how to get started. The organizations provide various methods to make the application process easier, including webinars, pamphlets, hotlines, online applications and more.

Helpful links:

[ACR Accreditation Information](#) - (800) 770-0145

[IAC Accreditation Information](#) - (800) 838-2110

http://www.jointcommission.org/accreditation/ahc_seeking_imaging_centers.aspx

[10 Things you need to know about CMS/MIPPA Accreditation Requirements](#) from ACR