

# MIPPA FAQ: Key Elements to Fulfilling the 2012 CMS Requirements

## 1 What is the Medicare Improvements for Patients and Providers Act (MIPPA)?

In July 2008, the Medicare Improvements for Patients and Providers Act (MIPPA) was approved by Congress and enacted into law. The bill requires that **by January 1, 2012, all nonhospital suppliers of the technical component of advanced diagnostic imaging services, inclusive of Nuclear Medicine, MR, CT and PET, must obtain accreditation as a condition for reimbursement.** At this time, the MIPPA requirements only apply to freestanding imaging centers.

The Centers for Medicare and Medicaid Services have designated three organizations to accredit suppliers seeking to furnish the technical component of advanced imaging services under the Medicare program: the **Intersocietal Accreditation Commission (IAC)**, the American College of Radiology (ACR) and the Joint Commission (TJC).

## 2 How does our facility get started on the accreditation process?

The IAC website, [www.intersocietal.org](http://www.intersocietal.org), provides everything you need to get started. Three of the IAC divisions are specific to the MIPPA requirement:



**ICANL** – offers accreditation for nuclear medicine, nuclear cardiology and PET facilities. **Get started today!**  
[www.intersocietal.org/icanl/seeking/getting\\_started.htm](http://www.intersocietal.org/icanl/seeking/getting_started.htm)



**ICAMRL** – offers accreditation for magnetic resonance (MRI) in the areas of Cardiovascular MRI, Breast MRI, Body MRI [chest (non-cardiac), abdomen, pelvis, extremity], Musculoskeletal MRI, Neurological MRI and MRA. **Get started today!**  
[www.intersocietal.org/icamrl/seeking/getting\\_started.htm](http://www.intersocietal.org/icamrl/seeking/getting_started.htm)



**ICACTL** – offers accreditation for computed tomography (CT) in the areas of Coronary Calcium Scoring CT, Coronary CTA, Neurological CT [Brain, Spine, CTA], Sinus and Temporal Bone CT, Body CT [Chest (Non-Coronary), Abdomen, Pelvis, Extremity] and Vascular/Other CTA [Chest (Non-Coronary), Abdomen, Pelvis, Peripheral/Extremity]. **Get started today!**  
[www.intersocietal.org/icactl/seeking/getting\\_started.htm](http://www.intersocietal.org/icactl/seeking/getting_started.htm)

## 3 Why choose IAC to accredit our facility?

With over 20 years of imaging accreditation experience, the IAC offers multi-modality, nationally recognized accreditation programs.

- User-friendly, secure Online Accreditation Application
- Multi-disciplinary approach
- Competitive application fees
- No phantom purchase required
- Comprehensive case review

## 4 What if our facility is already accredited by one of the IAC divisions (ICANL, ICAMRL and/or ICACTL)?

If your facility is already accredited by the ICANL, ICACTL and/or ICAMRL, initial accreditation is granted for a period of three years, so be sure that your facility's status will not expire before the deadline. (Check the status of your facility's accreditation in the Online Directory of IAC Accredited Labs at [www.intersocietal.org/iac/learnmore/lab\\_list.htm](http://www.intersocietal.org/iac/learnmore/lab_list.htm)). **If you need to renew your accreditation, be sure to do so in a timely manner; the facility must be fully accredited by January 1, 2012.** In addition, facilities must also be in compliance with the following newly mandated requirements that apply to CMS reimbursements after January 1, 2012:

- Facilities must be prepared to undergo a random site visit or audit at some time during their three-year accreditation period.
- Suppliers utilizing the services of a mobile imaging company but billing Medicare for the technical component must be accredited as the Medicare supplier.
- Facilities are required to have policies on patient record retention, consumer complaints, staff and patient safety
- Facilities must provide personnel qualifications with primary source verification
- CMS will not recognize "under review" or "provisional" status.

## 5 How can our facility be sure not to miss the January 1, 2012 deadline?

As the January 1, 2012 accreditation mandate approaches, the IAC staff will continue to oversee the processing and review of submitted applications as expeditiously as possible. Facilities preparing to submit, and those that have recently submitted their Online Accreditation applications and are awaiting an accreditation decision, are urged to act promptly to allow their applications to progress through the review cycle without disruption.

## 6 What happens if our facility misses the January 1, 2012 deadline?

Your facility will not receive Medicare reimbursement until your facility has been granted accreditation by one of the accrediting organizations. CMS will not recognize "under review" or "provisional" status.

## 7 When will I find out that our facility has been granted accreditation?

Once the completed application is submitted online and the supporting documentation (case studies, final reports, etc.) from the facility is received in the IAC office, the accreditation review process takes approximately 12 to 16 weeks to complete. The IAC division in which the facility has been granted accreditation will then provide a decision to the facility.

## 8 Can our facility's application be denied?

No application for accreditation will ever be initially denied. Facilities first receive notification of a delay or a site visit; a notification of denial may be sent if a facility fails three times to demonstrate substantial compliance to the *Standards*.

## 9 What happens if our application is delayed?

A facility whose accreditation is delayed receives a notification letter outlining the deficiencies identified during the application review and the additional information requested by the Board of Directors to grant accreditation. The IAC is dedicated to helping your facility avoid delay the first time around and to help you correct any problems that lead to your facility receiving a delayed accreditation status. Contact the IAC staff at 800.838.2110 for assistance on completing your application.

## 10 How do we notify CMS when our facility is granted accreditation to ensure we receive reimbursement after January 1, 2012?

Once your facility has been granted accreditation by the ICANL, ICAMRL and/or ICACTL, **the IAC will notify CMS.** The designated accrediting organizations will notify CMS of facilities' accreditation through a process of regular data file transfers prior to January 1, 2012.