April 1st, 2014, President Obama signed H.R. 4302, “Protecting Access to Medicare Act of 2014” (PAMA) into law. The law contains several provisions to extend funding for various Medicare programs. Of significant note, is the continued delay of a 24% payment reduction to the physician fee schedule through March 31, 2015 as mandated by the Sustainable Growth Rate (SGR) formula. This delay marks the 17th time that Congress has intervened in order to prevent physician payment.

Congress also delayed the implementation of ICD-10-CM until October 1st, 2015. This will allow healthcare providers an additional year for compliance and readiness.

Within PAMA, there were provisions dedicated to medical imaging as they relate to safety and quality for CT dose and requirements under NEMA Standard XR-29-2013. The standard identifies common CT system attributes that contribute to or help perform optimization/management of doses of ionizing radiation while still enabling the system to deliver the diagnostic image quality needed by the physician.*

Quality Incentives to Promote Patient Safety and Public Health in CT Diagnostic Imaging

Effective January 1, 2016, Medicare providers must ensure that CT equipment meets NEMA Standard XR-29-2013 – Standard Attributes on CT Equipment Related to Dose Optimization and Management.

The CT dose standard is applicable to CT-designated HCPCS codes in which the payment source originates from the Medicare Physician Fee Schedule (PFS) or the Hospital Outpatient Prospective Payment System (OPPS).
Providers that fail to attest to this standard by 2016 will be subjected to a 5% payment reduction for all CT-designated procedures for Medicare as it applies to the technical component of the procedure. Beginning in 2017 and subsequent years, the penalty will be 15%.

System attestation by providers will be verified through the periodic supplier accreditation process (e.g. Joint Commission, ACR, IAC, etc.).

The intent of this provision is to ensure patient safety and provider compliance that elevates the quality of care. This measure is not intended to be punitive.

This provision ensures that CT technology is compliant with the NEMA standard as it relates to patient safety and quality for Medicare beneficiaries. Attributes of this standard are as follows:

1. DICOM dose structured reporting
2. Pediatric and adult reference protocols
3. CT Dose Check
4. Automatic exposure control

*To learn more about these attributes, please access the following link: