



CMS Policy on Backdating the Effective Date of Accreditation for Advanced Diagnostic Imaging (ADI) Suppliers

Issue:

The backdating of the effective date of accreditation for an advanced diagnostic imaging (ADI) supplier to a date prior to the time that the accreditation actually became effective, so that the ADI supplier can get paid for ADI services furnished to Medicare beneficiaries during the time that their application for accreditation was pending or during a lapse in accreditation.

CMS Policy:

- The CMS-approved advanced diagnostic imaging accrediting organizations (ADI AOs) must provide CMS with the actual effective date for the accreditation provided to each ADI supplier they accredit.
- It is not permissible for any reason for the ADI AOs to provide CMS with an accreditation effective date that has been backdated from the actual accreditation effective date.
- It is not permissible for any reason for the ADI AOs to provide CMS with any type of altered accreditation effective date.

Rationale for Policy:

- CMS cannot allow the backdating of the ADI accreditation effective dates for ADI suppliers pursuant to §1834(e)(1)(A) of the Social Act (the Act) which states the following:

“(A) IN GENERAL.—Beginning with January 1, 2012, with respect to the technical component of advanced diagnostic imaging services for which payment is made under the fee schedule established under section 1848(b) and that are furnished by a supplier, *payment may only be made if such supplier is accredited by an accreditation organization designated by the Secretary under paragraph (2)(B)(i).*”

- As stated above, § 1834(e)(1)(A) of the Act, allows payment to be made to ADI suppliers only if they are accredited by a CMS-approved ADI AO.



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(continued)

- Because of the language in §1834(e)(1)(A), CMS is not permitted to allow the backdating of an ADI supplier's accreditation effective date for any reasons, including but not limited to allowing them receive payment for services furnished to Medicare beneficiaries while their application for ADI accreditation is still pending.
- Such backdating of an ADI supplier's accreditation effective date prior to the actual accreditation effective date is a violation of §1834(e) of the Act.
- CMS has an obligation to report ADI AOs that violate this policy to the HHS Office if the Inspector General.