COMPLIANCE UPDATE

TO:        Posted to Compliance Website
FROM:      Maryann C. Palmet, CPC, CPCO, CPMA, CENTC, CHC, AAPC Fellow
           Director, Office of Physician Billing Compliance
SUBJECT:   Radiology Assistants and Diagnostic Procedures
DATE:      December 11, 2018

The technical component of all diagnostic x-ray and other diagnostic tests payable under the Medicare physician fee schedule must be furnished under the appropriate level of physician supervision. The Medicare Physician Supervision of Diagnostic Procedures indicator specifies a level of physician supervision required for diagnostic tests.

Beginning with dates of services January 1, 2019 and after, Physician Supervision of Diagnostic Procedures indicator of “03” (personal supervision) will be revised as follows:

Procedure must be performed under the personal supervision of a physician. (Diagnostic imaging procedures performed by a Registered Radiologist Assistant (RRA) who is certified and registered by the American Registry of Radiologic Technologists (ARRT) or a Radiology Practitioner Assistant (RPA) who is certified by the Certification Board for Radiology Practitioner Assistants (CBRPA), authorized to furnish the procedure under state law, may be performed under direct supervision.)"

Direct supervision in the office setting means the physician must be present in the office suite and immediately available to furnish assistance and direction throughout the performance of the procedure. It does not mean that the physician must be present in the room when the procedure is performed.

I have not provided the definition of direct supervision in a facility setting because payment for the technical component of a diagnostic test when billed alone or as part of a global service (both technical and professional components) is not reimbursed under Medicare Part B.

This change in Medicare policy is only applicable to services considered to be diagnostic tests. For example, if a PICC line was placed with ultrasound guidance, the ultrasound would be considered a
diagnostic test but the PICC line placement is not. The placement of the PICC line must be performed by a billable provider (e.g., physician, PA, APRN) or by a resident under the supervision of a teaching physician. Radiology Assistants may not bill Medicare for the interpretation of diagnostic tests or the performance of services that fall outside the category of diagnostic tests.

cc: Leon J. Haley, Jr., M.D., MHSA
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