

FAQ - 2015 PQRS Payment Adjustment and Providers who Render Services at IDTFs

Question:

Do providers who work for independent diagnostic testing facilities (IDTFs) need to participate in the 2015 Physician Quality Reporting System (PQRS)?

Answer:

Eligible professionals (EPs) at IDTFs will not be subject to the 2015 or 2016 PQRS negative payment adjustment **only** for services rendered at the IDTF. However, EPs who render services at IDTFs **should** participate in the PQRS starting in 2015 to avoid the PQRS negative payment adjustment in 2017 and beyond.

During PQRS program years 2013 and 2014, the Centers for Medicare & Medicaid Services (CMS) issued guidance that EPs who rendered services at independent diagnostic testing facilities (IDTFs) would be eligible, but not able, to participate in PQRS due to their billing methodology. However, based on recent analysis, CMS has identified that services provided at or on behalf of an IDTF align with the billing methodology used for PQRS; therefore, these EPs are eligible and able to participate in PQRS.

CMS is working to correct this guidance; therefore, EPs who rendered services at IDTFs will not receive the negative 2015 or 2016 PQRS payment adjustment. If an EP working at an IDTF receives a PQRS payment adjustment on his or her 2015 Part B MPFS reimbursements, the claim will be automatically reprocessed to return the 1.5 (or 2.0) percent adjustment **only** for services rendered at the IDTF. Please allow several months for reprocessing of claims and corrections to the payment adjustments. The remittance advice for the reprocessed claims will indicate that the payment represents a previous reduction based on the PQRS, as indicted by the following claim adjustment reason code (CARC) and remittance advice remark code (RARC):

- CARC 237 – Legislated/Regulatory Penalty, to designate when an upward payment adjustment will be applied.
- RARC N699 – Payment adjusted based on the Physician Quality Reporting System (PQRS) Incentive Program.

Starting with PQRS program year 2015, EPs who render Part B MPFS services via the CMS-1500 form or electronic equivalent at an IDTF facility or on its behalf **should participate** in the PQRS to avoid the negative 2017 PQRS payment adjustment. Information on how to participate in the 2015 PQRS is available on the CMS [PQRS website](#).

Please contact the QualityNet Help Desk at 1-866-288-8912 (TTY 1-877-715-6222) or via qnetsupport@hcqis.org for help with questions. They are available from 7:00 a.m. to 7:00 p.m. Central Time Monday through Friday.