Special Provisions for Radiology Additional Documentation Requests

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Note: We revised this article to reflect the revised CR11659. We revised the CR release date, transmittal number, and the web address of the CR. We didn't need to change any other content due to the CR revisions. All other information remains the same.

PROVIDER TYPE AFFECTED

This MLN Matters® Article is for physicians, other providers, and suppliers submitting claims or documentation to Medicare Administrative Contractors (MACs) related to radiology services provided to Medicare beneficiaries.

PROVIDER ACTION NEEDED

This article discusses a pilot process enabling MACs to request pertinent documentation from the treating/ordering provider during medical review, in an effort to support the necessity and payment for radiology service(s)/item(s) billed to Medicare. Make sure that your billing staffs are aware of these changes.

BACKGROUND

MACs have the ability to auto-denial a claim if a benefit category, statutory exclusion, or coding issue is in question, or to send an Additional Documentation Request (ADR) to the provider selected for review, in order to review records to determine whether the claim is payable and medically necessary.

Currently, upon request for medical records, it is the responsibility of the provider selected for review to obtain supporting documentation as needed from the treating/ordering provider’s office (for example, a physician order or notes that support medical necessity) or from an inpatient facility (for example, progress notes). The treating/ordering provider should submit the requested documentation. However, because the provider selected for review is the one whose payment is at risk, it is this provider who is responsible for submitting, within the established timelines, the documentation requested by the MAC. The Medicare Program Integrity Manual, Chapter 3, Section 3.2.3.3, Third-Party Additional Documentation Request states:
“The treating physician, another clinician, provider, or supplier should submit the requested documentation. However, because the provider selected for review is the one whose payment is at risk, it is this provider who is ultimately responsible for submitting, within the established timelines, the documentation requested by the MAC, Comprehensive Error Rate Testing (CERT) contractor, Recovery Auditor and/or Unified Program Integrity Contractor (UPIC).”

ADDITIONAL INFORMATION

The official instruction, CR11659, issued to your MAC regarding this change is available at https://www.cms.gov/files/document/r10579otn.pdf.

If you have questions, your MACs may have more information. Find their website at http://go.cms.gov/MAC-website-list.

DOCUMENT HISTORY

<table>
<thead>
<tr>
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<td>March 22, 2021</td>
<td>We revised this article to reflect the revised CR11659. We revised the CR release date, transmittal number, and the web address of the CR. We didn’t need to change any other content due to the CR revisions. All other information remains the same.</td>
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