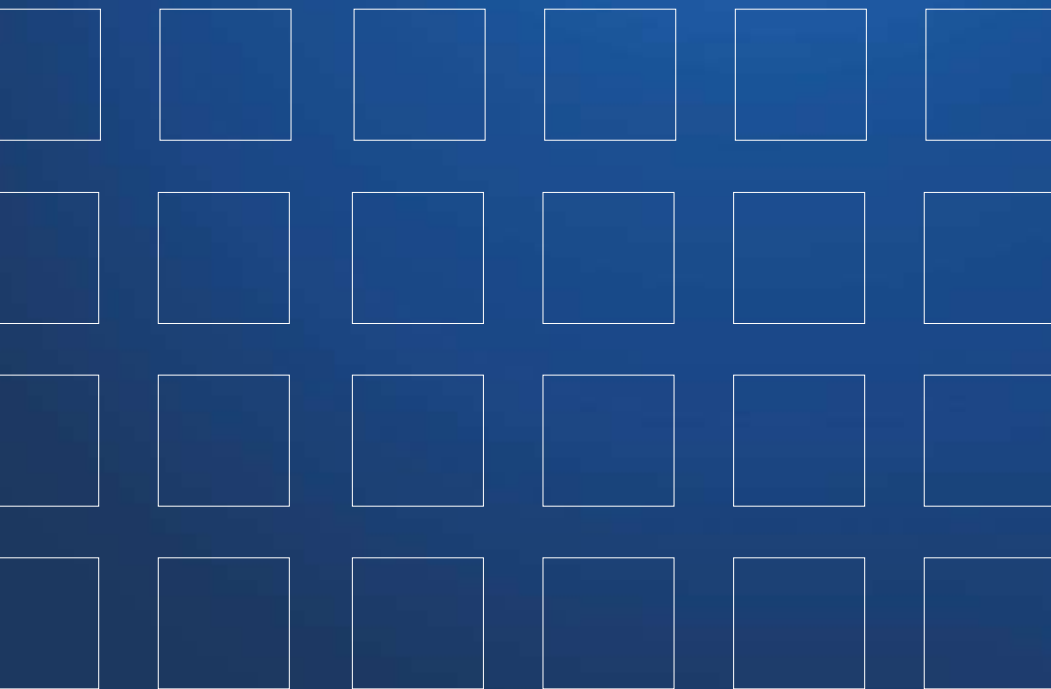


FAQs on the Diagnostic Imaging Accreditation Scheme



Accreditation
Assessment
Training
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What is the background to the Scheme?

Q: What is the background to the Diagnostic Imaging Accreditation Scheme (DIAS)?

A: In June 2007, the Australian Government amended the Health Insurance Act to introduce an accreditation system covering a range of diagnostic imaging services under the Radiology Quality and Outlays Memorandum of Understanding (Radiology MOU). The system became mandatory from 1 July 2008 for those practices providing radiology services under the Diagnostic Imaging Services Table (DIST) and a prerequisite for the payment of Medicare benefits for those services.

A decision was made in 2008 to implement the Scheme in stages to ensure that practices had ample time to prepare for accreditation under the DIAS and to allow the continuation of Medicare benefits during the transition of the Scheme.

There are currently around 2700 practices providing radiology services participating in the Stage I Scheme. Of those, more than 1000 have been accredited under Stage I of the Scheme by the National Association of Testing Authorities (NATA).

The two Ministerial Determinations that currently prescribe the operational arrangements for Stage I of the scheme will cease to have effect on 30 June 2010. By this date, the arrangements for the next phase will have been put in place, providing the mechanism for the ongoing operation of the accreditation scheme.

At present, not all Medicare funded diagnostic imaging services are covered by the DIAS arrangements. However from 1 July 2010 the scope of the Scheme will be broadened to include providers of non-radiology services (cardiac imaging, nuclear medicine imaging, and obstetric and gynaecological ultrasound).

What do we have to do and by when?

Q: Our practice was granted accreditation under the Stage I Scheme until 30 June 2010. What should we do now?

A: Stage I accredited practices moving to the Stage II Scheme are automatically granted accreditation until 30 June 2012 during which time, the practice will remain eligible to provide Medicare funded diagnostic imaging services.

The Medicare claims system will automatically be amended for practices in this category to allow the continuation of accreditation when the Stage II Scheme commences.

Should your practice also offer non-radiology services, and the items of equipment used to provide these services are listed under your LSPN by 30 June 2010, then the claims system will also be automatically updated to include non-radiology services under your Stage I accreditation.

Prior to 30 June 2012, the practice must apply for, and be granted accreditation against the full suite of Practice Accreditation Standards through an approved accreditor.

The accreditor will then conduct a desk-top audit to determine the practice's compliance with the full suite of Practice Accreditation Standards and make an accreditation decision prior to 30 June 2012.

Assuming the practice complies with the full suite of Practice Accreditation Standards, accreditation will be granted for a period of four years allowing for the continuation of Medicare benefits.

Q: Our practice was not required to be accredited, or chose not to be accredited under the Stage I Scheme. Is our practice covered by the transitional arrangements?

A: The transitional arrangements apply to any practice in operation prior to 1 July 2010 and:

- is providing non-radiology services (cardiac imaging, nuclear medicine imaging, and obstetric and gynaecological ultrasound);
- is not accredited against the entry level Practice Accreditation Standards; and
- does not have Medical Imaging Accreditation Program (MIAP) recognition under the Stage I Scheme.

Q: Our practice was not accredited as part of the Stage I Scheme, and we are eligible to enter the Stage II Scheme under the transitional arrangements described previously. What should we do now?

A: Non-accredited practices in operation prior to 1 July 2010 are eligible to register for deemed accreditation. Practices wishing to enter the Stage II Scheme under the transitional arrangements must register for deemed accreditation prior to 24 June 2010. The practice then has until 30 June 2011 to apply for and be awarded accreditation against the entry level Practice Accreditation Standards (or optionally, full suite Practice Accreditation Standards) during which time their Medicare benefits will continue.

Upon receipt of the application for accreditation, NATA will conduct a desk-top audit to determine the

practice's compliance with the entry level or full suite of Practice Accreditation Standards and make an accreditation decision prior to 30 June 2011.

For practices choosing to be accredited against the full suite of Practice Accreditation Standards up front, a desk-top audit will be conducted to determine compliance, and assuming the practice is found to be in compliance with the full suite of Standards, accreditation will be granted for four years.

Practices granted accreditation against the entry level Practice Accreditation Standards will be granted accreditation for a period of two years, before which time they will need to apply for accreditation against the full suite of Practice Accreditation Standards. NATA will have until this time to conduct a desk-top audit to determine the practices compliance with the full suite of Practice Accreditation Standards and make an accreditation decision. Assuming the practice is found to be in compliance, accreditation will be granted for a period of four years.

Q: Our practice is not accredited, is not eligible to enter the Stage II Scheme under the transitional arrangements (as described previously) and is seeking accreditation for the first time from 1 July 2010. What should we do now?

A: Practices seeking accreditation for the first time from 1 July 2010 will not be eligible to provide Medicare funded diagnostic imaging services until such a time as they apply and are granted accreditation against the entry level (or optionally, full suite) Practice Accreditation Standards.

Upon receipt of the completed application for accreditation, NATA will have up to 15 business days to conduct a desk-top audit to determine the practice's compliance with the entry level Practice Accreditation Standards. The turn around time will increase to 30 days for practices that have opted to be assessed against the full suite of Practice Accreditation Standards.

For practices choosing to be accredited against the full suite of Practice Accreditation Standards up front, a desk-top audit will be conducted to determine compliance, and assuming the practice is found to be complying with the full suite of Practice Accreditation Standards, accreditation will be granted for a period of four years.

Practices that apply for and are subsequently determined to be in compliance with the entry level Practice Accreditation Standards will be granted accreditation for a period of two years, during which



time their Medicare benefits will continue. These practices will have until their second anniversary of accreditation against the entry level Practice Accreditation Standards to be assessed against the full suite of Standards. Assuming that they are found to be in full compliance, the practice will be granted accreditation for a further four years.

Practices should note that they are not eligible to provide Medicare funded diagnostic imaging services until they obtain accreditation.

Q: Our practice is not currently accredited, however has previously held accreditation. What should we do now?

A: Non-accredited practices seeking accreditation that have previously been accredited will not be eligible to provide Medicare funded diagnostic imaging services until such a time as they apply for and are granted accreditation against the full suite of Practice Accreditation Standards.

After receiving a completed application, NATA will conduct a desk-top audit within 30 days to determine the practice's compliance with the full Suite of Practice Accreditation Standards, and make a decision. Assuming that the Practice is found to be in full compliance, accreditation will be granted for a period of four years. The Practice may provide Medicare funded diagnostic imaging services from the date accreditation is granted.

Q: Our practice holds RANZCR/NATA MIAP accreditation. What does this mean for us?

A: Practices with accreditation under the voluntary RANZCR/NATA MIAP will have their MIAP accreditation recognised under the Stage II Scheme.

Practices with MIAP accreditation which was recognised under the Stage I Scheme up to and including 30 June 2010 will maintain their accreditation under the Stage II Scheme from 1 July 2010 to 30 June 2012.

As MIAP is a joint program of NATA and RANZCR, NATA has ready access to the details of those practices with MIAP accreditation. The diagnostic imaging team will

work closely with the Medical Imaging staff to ensure that all Stage II requirements for these practices are performed seamlessly to minimise any interruptions to the practice.

Thereafter, if your practice maintains its MIAP accreditation, NATA will ensure that Medicare is notified of your continued accreditation and that it is recognised for the purposes of the Stage II Scheme. There will be no additional cost for this service.

Likewise, NATA will ensure that MIAP accredited practices seeking to enter Stage II under the transitional provisions, or seeking accreditation for the first time from 1 July 2010 have their MIAP accreditation recognised and accreditation for the purposes of the Stage II Scheme until the date of the expiration of the MIAP accreditation.

Q: What if our practice does not want to be accredited?

A: The Department of Health and Ageing (DoHA) is required under law to remove access to Medicare funded diagnostic imaging services for practices that do not comply with the requirements of the DIAS.

How long do we have to comply with the new legislation?

Q: How long do Stage I accredited practices have to move to Stage II?

A: Practices participating in Stage I of the Scheme accredited against the entry level standards as at 30 June 2010 will have two years in which to apply for and be granted accreditation against the full suite of Practice Accreditation Standards.

Q: How long do non-accredited practices eligible to enter the scheme under transitional arrangements have to register for deemed accreditation?

A: Under the transitional arrangements, practices providing non-radiology services, who have not previously been accredited under the Stage I Scheme, must register for deemed accreditation with an approved accreditor prior to 24 June 2010. Registering for deemed accreditation means that from 1 July 2010 up to and including 30 June 2011 the practice can continue to provide Medicare funded DIST services whilst working toward accreditation under the Stage II Scheme.

Practices failing to register for deemed accreditation prior to 24 June 2010 will not be eligible to provide Medicare funded diagnostic imaging services from 1 July 2010. Practices will have to apply and be granted accreditation against the entry level (or optionally, the full suite)

Practice Accreditation Standards before such a point as their Medicare benefits resume.

Q: How long will the transitional period last for non-accredited practices entering the Stage II Scheme under the transitional arrangements?

A: Prior to 30 June 2011, the practice will need to apply for and be awarded accreditation, at a minimum, against the entry level Practice Accreditation Standards. As an alternative, the practice will have the option to seek accreditation against the full suite of Practice Accreditation Standards.

Do we need to register for deemed accreditation under the new Scheme?

Q: Who needs to register for deemed accreditation under the new Scheme?

A: Those practices who are eligible to enter the Scheme under transitional arrangements (i.e. provide non-radiology services and have not been accredited under the Stage I Scheme) must register for deemed accreditation before 24 June 2010 to ensure their continued provision of Medicare funded diagnostic imaging services.

The Act provides that a Medicare benefit is not payable in respect of a diagnostic imaging service rendered by or on behalf of a medical practitioner unless the procedure is carried out at (or using equipment that is ordinarily located at) diagnostic imaging premises that are, or a base for mobile diagnostic imaging equipment that is, accredited for that procedure under the Scheme. Therefore, practices who do not comply with the requirement to register and become accredited under this Scheme will cease to receive Medicare rebates.

Q: If our practice is deemed to be accredited then do we have to comply with the law?

A: If your practice has deemed accreditation, the practice must continue to comply with the requirements of the DIAS and achieve accreditation against the Practice Accreditation Standards within the required timeframes in order to continue to be eligible to provide Medicare funded diagnostic imaging services.

Q: What should we do if we're not sure about whether we should register?

A: Contact us on 1800 621 666 or email diaccreditation@nata.com.au. Our highly qualified and experienced team understands the needs of diagnostic imaging practices and is fully conversant with the requirements of the DIAS.

What are the requirements for accreditation under the new law?

Q: What will be the requirements for accreditation and how is an application for accreditation made?

A: In order to apply for accreditation against either the entry level or full suite of Practice Accreditation Standards:

- A practice must submit an online application (a paper based alternative is also available) including documentary evidence in support of their compliance with the entry level or full suite Practice Accreditation Standards.
- An off-site desk-top audit conducted by the approved accreditor will determine the extent of the practice's compliance with the entry level or the full suite of Practice Accreditation Standards.
- Practices demonstrating compliance with the entry level Practice Accreditation Standards will be granted accreditation for two years from the date of the grant of accreditation. Practices demonstrating compliance with the full suite of Practice Accreditation Standards will be granted accreditation for four years from the date of accreditation.

Q: What is the maintenance program and how does it work?

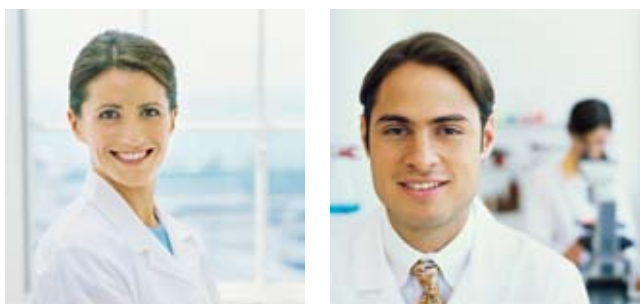
A: Once accredited against the full suite of Practice Accreditation Standards, all practices participating in the Stage II Scheme will enter into a maintenance program whereby every four years the practice will be reassessed against the full suite of Practice Accreditation Standards. There will also be arrangements to accommodate practices that are accredited under the MIAP.

What are the main changes in the new legislation and what else do we need to know?

Q: What are the main changes in the new legislation?

A: The Health Insurance Act 1973 (the Act) and its regulations set the conditions under which diagnostic imaging services are eligible for Medicare benefits.

The Act provides that, a Medicare benefit is not payable in respect of a diagnostic imaging service rendered by or on behalf of a medical practitioner unless the procedure is carried out at (or using equipment that is ordinarily located at) diagnostic imaging premises that are, or a base for mobile diagnostic imaging equipment that is, accredited for that procedure under the Scheme.



The Scheme is being implemented in two stages. The Stage I Scheme commenced on 1 July 2008 and covered practices providing radiology services. Stage II will see the scope of the scheme broadened to include providers of non-radiology services (cardiac imaging, nuclear medicine imaging, and obstetric and gynaecological ultrasound).

The Practice Accreditation Standards for the Stage II Scheme are a Schedule to the Stage II Instrument. The Practice Accreditation Standards include three entry level standards covering existing regulatory requirements regarding the registration and licensing of staff, radiation safety and equipment. Practices may be assessed against the entry level Practice Accreditation Standards or the full suite of Practice Accreditation Standards depending on the practice's accreditation pathway. As an alternative to a practice seeking accreditation against the entry level (or full suite) Practice Accreditation Standards, a practice may seek recognition of MIAP accreditation.

Standards

Standard 1.1	Safety and Quality Governance Standard
Standard 1.2	Registration and Licensing Standard*
Standard 1.3	Radiation Safety Standard*
Standard 1.4	Equipment Inventory Standard*
Standard 1.5	Equipment Servicing Standard
Standard 1.6	Infection Control Standard
Standard 2.1	Provision of Service Standard
Standard 2.2	Consumer Information Standard
Standard 2.3	Patient Identification & Procedure Matching Standard
Standard 2.4	Medication Management Standard
Standard 3.1	Diagnostic Imaging Protocol Standard
Standard 3.2	Technique Charts Standard
Standard 4.1	Communicating with Requesting Practitioners
Standard 4.2	Results of Self-Determined Services Standard
Standard 4.3	Consumer Feedback and Complaints Management Standard

* Entry level Practice Accreditation Standards

Q: What are the transitional provisions?

A: Practices providing non-radiology services (cardiac imaging, nuclear medicine imaging, and obstetric and gynaecological ultrasound) can transition into the Stage II Scheme by registering for deemed accreditation from the commencement of the registration period to 24 June 2010. Registering for deemed accreditation will ensure continued Medicare eligibility from the commencement of the Stage II Scheme on 1 July 2010 for a period of one year.

The transitional arrangements are intended to enable approximately 1400 practices delivering non-radiology services to enter the Stage II Scheme in much the same way as practices providing radiology services were transitioned into the Stage I Scheme.

To be eligible to apply for deemed accreditation under the Stage II Scheme, practices will need to be:

- in operation prior to 1 July 2010;
- providing non-radiology services (cardiac imaging, nuclear medicine imaging, and obstetric and gynaecological ultrasound); and
- not be accredited against the entry level Practice Accreditation Standards and not have MIAP recognition under the Stage I Scheme.

For these practices, their deemed accreditation will cease on 30 June 2011 or, where a practice is granted accreditation under the Stage II Scheme prior to that date, on that earlier date.

What will happen to our practice if we are found to be in breach of the requirements or Standards underpinning the DIAS?

Q: In what circumstances will our deemed accreditation be terminated?

A: The deemed accreditation of non-accredited practices that have entered the Stage II Scheme under the transitional arrangements will expire on 30 June 2011. Practices that have not been accredited against the entry level Practice Accreditation Standards at this point will no longer be able to provide Medicare funded diagnostic imaging services.

To be able to provide Medicare funded diagnostic imaging services again, the practice will have to be awarded accreditation against the full suite of Practice Accreditation Standards. The practice can only provide Medicare funded diagnostic imaging services from the date of accreditation, not before.

Q: In what circumstances will our accreditation be varied, suspended or revoked?

A: A decision will be made to vary, suspend or revoke accreditation in situations where:

- time has expired, and critical deadlines have not been met;
- the approved accreditor considers that there is a potential danger to public health or safety if accreditation is not revoked; or
- the practice is found to be in breach of the entry level or full suite of Practice Accreditation Standards (as applicable to the practice) or a condition on accreditation and the Proprietor of the practice has failed to rectify the breach in accordance with the legislative requirements.

Q: What if we disagree with the accreditation decision? Is there an appeals process?

A: Practices have two avenues of appeal. In the first instance, practices should apply to their approved accreditor for a reconsideration. Practices have 28 calendar days after the date of a decision made by their approved accreditor to apply for a reconsideration. Where a request for reconsideration is received by the due date, the approved accreditor must make a decision within 30 days based on the information contained within the original and second review.

Should the accreditation decision be reversed then accreditation/reaccreditation shall be granted in accordance with standard procedure. Should the original accreditation decision be upheld, a further reconsideration request to the Minister for Health and Aging can be made by the practice within 28 days.

What are the arrangements for MIAP accredited practices?

Q: What are the requirements for NATA members accredited under the RANZCR/NATA Medical Imaging Accreditation Program (MIAP)?

A: Practices with accreditation under the voluntary RANZCR/NATA MIAP will have their MIAP accreditation recognised under the Stage II Scheme.

Any practice accredited until 30 June 2010 because their MIAP accreditation was recognised in Stage I will maintain their accreditation under the Stage II Scheme from 1 July 2010 to 30 June 2012.

Thereafter, while the practice maintains its MIAP accreditation, NATA will ensure that Medicare is notified of its continued MIAP accreditation and that it is recognised for the purposes of the Stage II Scheme. Likewise, NATA will ensure that MIAP accredited practices seeking to enter

Stage II under the transitional provisions, or seeking accreditation for the first time from 1 July 2010 have their MIAP accreditation recognised and accreditation for the purposes of the Stage II Scheme until the date of the expiration of their MIAP accreditation.

Q: What is NATA doing for members with MIAP accreditation in relation to meeting the new requirements?

A: As MIAP is a joint program of NATA and RANZCR, NATA has ready access to the details of those practices with MIAP accreditation. The NATA Medical Imaging staff will ensure that all Stage II requirements for these practices are performed seamlessly within the current accreditation activities to minimise any interruptions to the practice.

RANZCR/NATA Medical Imaging Accreditation Program

Q: What is MIAP?

A: NATA and RANZCR run a joint Medical Imaging Accreditation Program (MIAP) that is highly respected, has a proven track record and is dedicated to providing quality technical accreditation.

Facilities accredited by this joint program are assessed against the professionally developed standards produced by RANZCR, Standards of Practice for Diagnostic and Interventional Radiology Version 9. The program was updated in 2009 to offer greater quality, convenience and flexibility, along with cost savings.

RANZCR/NATA Medical Imaging Accreditation offers streamlined accreditation with facilities only needing to refer to one standard, RANZCR Version 9, which combines the generic management system aspects of the international standard, ISO/IEC 17025, and the necessary professional and modality-specific requirements as developed by the profession.

The RANZCR/NATA MIAP is a high-level process of recognising collective, specific and demonstrated competencies through peer-review.

RANZCR/NATA's MIAP can be tailored to suit individual organisational and geographical needs, while still ensuring the facility meets recognised industry standards.



Need more information?

Contact us on 1800 621 666 or email diaccreditation@nata.com.au. Our highly qualified and experienced team understands the needs of diagnostic imaging practices and is fully conversant with the requirements of the DIAS. A member of our team will be more than happy to assist you with any enquiries you have as you move through the process of obtaining accreditation.

In addition, the DoHA will be developing a Guide to the Practice Accreditation Standards to assist compliance. The Guide for the entry level Practice Accreditation Standards will be available from 1 July 2010.

In addition, information regarding the Governments Diagnostic Imaging Accreditation Scheme can be found on the Department of Health and Ageing website. Visit www.nata.com.au/dias.

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