

Attachment 2**INDEPENDENT DIAGNOSTIC TESTING FACILITIES (IDTFs)**

All suppliers that perform diagnostic tests, other than clinical laboratory or pathology tests, and are required to enroll as an IDTF must complete this attachment. CMS requires the information in this attachment to determine whether the enrolling supplier meets all IDTF standards. Not all suppliers that perform diagnostic tests are required to enroll as an IDTF. Generally, an entity can bill for the technical component of the diagnostic tests without an IDTF enrollment if it has the following characteristics:

- A physician practice that is owned, directly or indirectly, by one or more physicians or by a hospital;
- A facility that primarily bills for physician services (e.g., evaluation and management (E&M codes)) and not for diagnostic tests;
- A facility that furnishes diagnostic tests primarily to patients whose medical conditions are being treated or managed on an ongoing basis by one or more physicians in the practice;
- The diagnostic tests are performed and interpreted at the same location where the practice physicians also treat patients for their medical conditions.

However, if a substantial portion of the facility's business involves the performance of diagnostic tests, the diagnostic testing services may be a sufficiently separate business to require enrollment as an IDTF. In that case, the physician or physician group practice can continue to be enrolled as a physician or physician group practice but are also required to enroll as an IDTF. The physician or group practice can bill for professional fees and the diagnostic tests they perform on their patients using their billing number. Therefore, the practice must bill as an IDTF for diagnostic tests furnished to Medicare beneficiaries who are not regular patients of the physician or group practice.

Applicants who are unsure if they require IDTF enrollment should contact their Medicare carrier for a determination.

Diagnostic Radiology – Many diagnostic tests are radiological procedures that require the professional services of a radiologist. We recognize that a radiologist's practice is generally different from those of other physicians because radiologists usually do not bill E&M codes or treat a patient's medical condition on an ongoing basis. A radiologist or group practice of radiologists is not necessarily required to enroll as an IDTF. A radiologist or group of radiologists are not required to enroll as an IDTF if all of the following conditions are met:

- The practice is owned by radiologists, a hospital, or both;
- The owning radiologist(s) and any employed or contracted radiologist(s) regularly perform physician services (e.g., test interpretations) at the location where the diagnostic tests are performed;
- The billing patterns of the enrolled facility indicate that the facility is not primarily a testing facility and that it was organized to provide the professional services of radiologists (e.g., (1) the enrolled facility should not be billing for a significant number of purchased interpretations, (2) the facility should rarely only bill for the technical component of a diagnostic test, (3) the facility should bill for a substantial percentage of all interpretations of the diagnostic tests performed by the practice), and
- A substantial majority of the radiological interpretations are performed at the practice location where the diagnostic tests are performed.

If enrolling as a diagnostic radiology group practice or clinic, and will be billing for the technical component (tc) of diagnostic radiological tests without enrolling as an IDTF, the facility should be prepared to prove that it meets the exceptions shown above.

A mobile IDTF that provides X-ray services is not classified as a portable X-ray supplier. Therefore, they cannot bill for transportation and setup. If they desire to bill for these services, they must also enroll as a portable X-ray supplier and bill in accordance with the portable X-ray supplier billing rules.

Before completing this attachment, all providers/suppliers considering enrolling as an IDTF should carefully review 42 CFR 410.33, titled "Independent Diagnostic Testing Facility." This reference is available on the Internet through the National Archives and Records Administration web site, or at many libraries or legal reference services.