

Partner W. Kenneth Davis Jr. Quoted in *Report on Medicare Compliance*

December 22, 2008

W. Kenneth Davis Jr., a partner in the firm's Health Care Practice, was quoted in an article in *Report on Medicare Compliance* on new Medicare regulatory requirements requiring mobile diagnostic testing facilities that do imaging to enroll in Medicare as independent diagnostic testing facilities (IDTFs) and bill Medicare directly. Mr. Davis says that the new regulations contain some ambiguities, especially for hospitals, which may have a number of different contract arrangements. In addition, Mr. Davis says the Centers for Medicare & Medicaid Services (CMS) undermined its own rule with an FAQ it posted on the CMS website. Mr. Davis suggests providers compare the FAQ to existing IDTF performance standards and reevaluate their relationships to determine what aspects are subject to the regulation. ("CMS Guidance Muddies Fate of Provider Arrangements With Mobile Imaging Entities," December 22, 2008)

CONTACTS

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