

This is follow-up to the letter dated April 16, 2018, that you received from our Chief Revenue Officer in regards to Coding and Compliance requirements set-forth by the CMS MIPS program.

As the billing environment has begun moving more and more to the pay-for-performance from the pay-for-service model, the Board recognizes the importance of collectively addressing certain requirements spelled-out in the program in order to maximize reimbursements. The Chief Financial Officer mentioned the importance of dictating specific requirements in our radiology reports. The good news is that, if we fail to dictate an exam correctly, the coding team is there to lend us a hand in getting the mistake corrected. The simplest and most expedient way to do this is via email. Therefore, as mentioned and as currently practiced, they will send us an email alerting us to the error and requesting that we addend the report.

The purpose of the following policy is to make sure we all comply in completing those addendums as quickly as possible and to emphasize the importance of meeting the CMS MIPS program requirements.

POLICY

If a radiologist has 3 or more outstanding addendums that need completed for billing compliance purposes at the end of a quarter, defined as March 31, June 30, September 30 and December 31, and has been notified of the need for completing the addendums via email no later than 5 business days before a quarter ends, excluding any vacation days, then they will be assessed a fine of \$500. If the delinquency continues for two consecutive quarters or longer, the fine will then be increased to \$1000 for that and subsequent quarters.

The fine will be deducted from the radiologist's paycheck no later than the second pay cycle after the quarter the radiologist is in non-compliance.

Respectfully,

The Board of Directors