



# CMS Clarifies eCQM Compliance: Hospitals Have a Choice

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## Introduction

**On January 30, 2025, the Centers for Medicare & Medicaid Services (CMS) issued an official statement clarifying that hospitals are not required to use any specific vendor's software for compliance with the Excessive Radiation Dose or Inadequate Image Quality for Diagnostic Computed Tomography in Adults eCQM.**

From the beginning, the measure specifications never mandated the use of a specific vendor's software - including Alara's. While this was explicitly stated in the original measure language, CMS's statement makes this crystal clear:

"Hospitals and clinicians who choose to report this eCQM may use any vendor's software that meets the necessary requirements to generate the standardized data elements required to calculate the measure, consistent with the measure's specifications. Hospitals and clinicians are not required to use the Alara Imaging Software for CMS measure compliance. Any software vendor capable of calculating and reporting this eCQM in accordance with the measure's specifications, including transforming radiology data into a format compatible with eCQM reporting, may report this measure on behalf of hospitals and clinicians."

This clarification is responsive to industry-wide misrepresentation. While this has always been the case, many in the industry were led to believe otherwise. CMS's latest clarification reinforces that hospitals can choose any vendor capable of calculating and reporting the eCQM in accordance with the measure's specifications.

## CMS Addresses Burdens on Healthcare Providers

CMS also addressed another critical point that reduces unnecessary burdens on healthcare providers:

"Hospitals and clinicians are not required to demonstrate to CMS that the software they or their vendors use can generate and transform the radiology data into the necessary format."

This means hospitals do not need CMS approval for their chosen software. As long as the software meets eCQM specifications, hospitals can proceed without additional validation requirements. CMS also confirmed that they will actively monitor data submissions to ensure hospitals report accurate, reliable, and valid results.

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## Imalogix: A Transparent and Integrated Solution

Imalogix has actively worked with CMS to ensure our customers receive accurate, transparent guidance on compliance requirements. From the start, we understood that CMS never required hospitals to use any specific vendor's software. This was clearly outlined in the August 2023 rulemaking published in the Federal Register. However, because misinformation persisted, we worked to secure explicit confirmation that hospitals have vendor flexibility. Now, that confirmation is in writing.

Our approach to compliance is simple: **transparency and trust**. Unlike standalone vendors that add unnecessary costs and complexity, Imalogix integrates compliance reporting directly into our existing platform—without extra fees. Our customers already rely on us for data transparency, performance monitoring, and benchmarking, so incorporating eCQM reporting as part of that framework was the natural choice.

With Imalogix, hospitals benefit from:

- **Full Calculation Transparency** – Users have complete visibility into how their data is processed, ensuring trust in compliance reporting.
- **Cloud-Based Convenience** – No outdated on-prem installation required. Imalogix provides a modern, integrated approach.
- **Seamless Compliance Reporting** – Hospitals don't have to purchase separate integrations or upgrades to make the system work.
- **Benchmarking Data** – Users can compare their eCQM performance to other Imalogix hospitals, helping them assess whether to report.

By contrast, Alara's system does not allow hospitals to see how their calculations are performed, effectively creating a black-box compliance model where providers must trust results without visibility into the methodology. For a measure that impacts both patient safety and financial performance, this lack of transparency is a serious issue.

Currently, Alara's free version is limited to an on-premises model, adding IT complexity and restricting flexibility. Critically, the free version only performs calculations—it does not support integration with health systems or data-sharing without costly upgrades. This model forces hospitals into a tiered pricing structure for features that should be standard in a compliance solution.

Hospitals deserve **transparent, cost-effective compliance solutions**—without vendor-imposed limitations or misleading claims. CMS's statement reinforces that choice.

At Imalogix, we will continue to advocate for hospital flexibility, provide fully transparent compliance solutions, and ensure that healthcare providers can focus on patient care—not vendor-driven confusion.

For more information on how Imalogix supports hospitals with compliance reporting, contact Olav Christianson at [olav.christianson@imalogix.com](mailto:olav.christianson@imalogix.com).