

ROADMAP TO CMS eCQM COMPLIANCE

FOR HOSPITAL CMS COMPLIANCE TEAMS

WHO THIS GUIDE IS FOR

This roadmap is designed for hospital compliance officers, quality directors, and CMS reporting leads who are responsible for electronic Clinical Quality Measures (eCQMs)—but may be unfamiliar with this new imaging-based requirement:

“ Excessive Radiation Dose or Inadequate Image Quality for Diagnostic CT in Adults.”

If your team hasn't yet engaged Radiology—or isn't sure where to begin—this guide walks you through each critical step toward full compliance by 2027.

Why This Measure Is Different

- It's based on image-level data, not EMR fields
- It requires complex calculations unavailable in standard EMR systems
- It evaluates both radiation dose and diagnostic image quality
- It demands new workflows across Radiology, Physics, IT, and Compliance.

STEP 1 IDENTIFY INTERNAL OWNERS

Start by mapping stakeholders. These roles will streamline your compliance effort:

- Director of Radiology or Imaging Services
- PACS Administrator or Radiology IT Lead
- Diagnostic Medical Physicist
- CT Modality Manager or Technologist Supervisor
- Dose Monitoring Software Admin (e.g., Imalogix, Radimetrics)
- Compliance & Quality Reporting Team

Hold a cross-functional kickoff meeting to:

- Introduce the new CMS measure
- Review workflow, data, and software requirements
- Assign ownership and next steps across departments

Ask:

- Do we know who currently handles CMS reporting?
- Have they been briefed on this specific measure?
- Has Radiology been brought into these conversations?
- Has a vendor already engaged with someone at your organization?

STEP 2 UNDERSTAND WHAT'S REQUIRED

Each CT exam must include three calculated values:

- 1 CT Category:** CMS-defined protocol grouping
- 2 Global Noise Level:** Quantified image quality value
- 3 Size-Adjusted Radiation Dose:** Patient-normalized dose metric

These values are not available at time of CT exam, rather they must be calculated from exported DICOM image data using specialized software, which is then sent to your EMR and patient record

Ask:

- Have we seen a detailed breakdown of the required data fields?
- Do we know what we currently collect—and what's missing?

STEP 3 DETERMINE YOUR TECHNICAL CAPABILITY

To comply with this measure, your organization must be able to calculate and extract specific values from CT image data—not just retrieve fields from the EMR. This requires a combination of:

- Dose monitoring or imaging analytics software that can perform CMS-compliant calculations
- PACS and scanner integration to access DICOM metadata and image-level attributes
- Translation functionality to convert this data into a CMS-ready submission format

Inventory existing tools

Confirm what dose monitoring or imaging analytics platforms are currently in use (e.g., Imalogix, Radimetrics). Document which hospitals or imaging sites are covered, and whether they include CT.

Verify software capabilities

Contact your vendor(s) or review documentation to determine if your existing platform can calculate the three reportable CMS metrics and send to next step (IDentify next step)

Review data fidelity

Determine whether your current platform can:

- Support export in CSV or FHIR format
- Transmit data to CMS directly or integrate with your EMR for handoff

Loop in IT security and informatics teams

Depending on whether you're using a cloud or on-prem platform, your IT and compliance teams will need to evaluate:

- Network security and data storage requirements
- Vendor access policies and integration approvals
- Lead times for internal procurement or legal review if needed

Use These Questions to Confirm Readiness:

- What software are we using today for dose monitoring or image analytics?
- Has the vendor confirmed they support the CMS eCQM calculations?
- Are we capturing the necessary scanner-level data?
- Do we have translation or export capabilities aligned with CMS formats?
- Has IT been consulted about the deployment?

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STEP 4 ALIGN BUDGET AND RESOURCES




Be proactive about financial planning and resource allocation:

- Licensing or upgrading dose monitoring or analytics software
- PACS or IT integration work
- Radiology time for outlier review and protocol optimization
- Compliance or vendor support for data validation and submission

Ask:

- Has a CMS compliance budget been created for 2025-2027?
- Have Finance and IT been briefed on potential costs?
- What's the lead time for implementation and internal security approvals?

AVOID COMMON MISTAKES

-  **Don't assume your EMR captures the required data**
-  **Don't wait to engage Radiology—they're critical to success**
-  **Don't delay. Legal and IT review timelines may push your implementation past 2026**

WHAT SUCCESS LOOKS LIKE

You've:

- **Mapped ownership** across Radiology, Compliance, IT, and Finance
- **Confirmed software capabilities** for CMS-required values
- **Chosen a submission method** and validated the format
- **Built a repeatable workflow** for review and reporting
- **Tested outputs** ahead of the 2027 deadline

Need Help Getting Started?

Your Radiology team, compliance team, or physicist may already be working with a vendor.

Ask:

- What software are we using today?
- Can it support CMS reporting?
- Who are the main vendor contacts who can help support this CMS measure?