

Clarification of National Standards Permitting Qualified RDs, RNs, or Pharmacists to Individually Furnish Diabetes Self-Management Training Services

The Centers for Medicare and Medicaid Services recently clarified payment policy regarding the quality standards applicable to Diabetes Self-Management Training (DSMT) providers. In particular, CMS instructed contractors about the differences between the quality standards for entities following the CMS quality standards and those following the National Standards for Diabetes Self-Management Training Program (National Standards).

- *CMS Quality Standards* – DSMT providers following CMS quality standards generally require a multidisciplinary team approach to the provision of DSMT services (although there is an exception to this requirement which permits a Registered Dietitian who is also a Certified Diabetes Educator to individually furnish DSMT services in a rural area). In addition, CMS has noted that a dietitian may not be the sole provider of the DSMT service. CMS has instructed contractors that this exception and special note are applicable only to those entities following the CMS quality standards.
- *National Standards* – National Standards no longer require a multidisciplinary team approach, although these quality standards note that DSMT services are most effective when delivered by multidisciplinary teams consisting of a Registered Dietitian (RD), Registered Nurse (RN), and pharmacist as the key primary instructors for diabetes educators assisting in the delivery of services. Current National Standards require that at least one member of the team (or, if no team, the individual furnishing the training) must be an RD, an RN, or a pharmacist. The National Standards continue to call for all of the instructor(s) on the diabetes team to be certified as diabetes educator(s) or have recent educational and experiential preparation in education and diabetes management. However, the review and approval of credentials of DSMT program instructors is solely the role of the accrediting organization (listed below).

Until the Medicare Benefit Policy Manual is revised, contractors have been instructed to recognize that DSMT services may be furnished by an individual RD, RN, or pharmacist when those services are billed by, or on behalf of, a DSMT entity accredited as meeting the National Standards by the American Diabetes Association, Indian Health Service, or the American Association of Diabetes Educators, which are all CMS-approved accrediting organizations that use the National Standards for DSMT programs. This clarification does not affect who can qualify as “certified providers” to bill for DSMT services and, as such, payment for DSMT services may only be made to a physician, individual, or other provider that bills Medicare for other services for which direct Medicare payment may be made by CMS.

When following the National Standards, RDs may submit claims and be paid directly for DSMT services, as appropriate, because RDs are permitted to bill and receive payment for other Medicare services. However, since pharmacists and RNs cannot bill and receive payment directly from CMS for these types of services, the DSMT services they furnish to Medicare beneficiaries are billed by other certified providers, as appropriate, on their behalf.