

CMS Proposes Voluntary Reporting of the Excessive Radiation Quality Measure for Hospital Outpatient Departments

In the recently published 2026 Hospital Outpatient Prospective Payment System proposed rule, the Centers for Medicare and Medicaid Services (CMS) proposed to modify the Excessive Radiation Dose or Inadequate Image Quality for Diagnostic CT in Adults electronic clinical quality measure (eCQM) from mandatory reporting beginning with the calendar year (CY) 2027 reporting period to continue voluntary reporting in the CY 2027 reporting period and subsequent years.

The CMS proposal to maintain indefinite voluntary reporting of this measure arises from continued feedback expressing concerns about the complex interfaces necessary to develop, maintain, and report the Excessive Radiation eCQM, including the financial burden and operational feasibility needed to translate CT radiology

data into standardized eCQM-consumable data used by the measure. The AAPM provided written comments opposing mandatory reporting of a flawed quality measure.

The proposed modification from mandatory to voluntary reporting of the Excessive Radiation eCQM beginning with the CY 2027 reporting period would allow hospital outpatient departments additional time to integrate, adequately test, and gain experience with implementing the eCQM. This modification would also provide CMS with additional time to monitor implementation progress, including data collection burden and response rates. CMS will continue to consider feedback regarding this measure and may propose additional changes in future rulemaking.