



AMERICAN SOCIETY FOR CLINICAL LABORATORY SCIENCE

July 17, 2006

Centers for Medicare and Medicaid Services (CMS)
Mailstop: C4-07-07
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Sir/Madam:

The American Society for Clinical Laboratory Science (ASCLS) is writing in response to the proposed revisions of the payment determinations for specific new Physicians' Current Procedural Terminology Codes for clinical laboratory tests. These are the new codes that will be included in Medicare's Clinical Laboratory Fee Schedule for calendar year 2007.

ASCLS is the nation's oldest and largest non-registry professional association for non-physician clinical laboratory professionals. The Society's mission includes promoting high standards of practice in the workplace and ensuring professional competence, while its ultimate goal is to ensure excellent, safe, efficient, and effective laboratory services for consumers of health care. Our membership of nearly 11,000 includes clinical laboratory directors, managers, administrators, supervisors, and staff at all levels of practice.

We have attached a spreadsheet with our suggestions for crosswalking the eleven new codes to assign payment. We have indicated our agreement with colleagues from AACC and the College of American Pathologists for codes 8210x, 8369x, and 8391x. For the remaining codes, we have based our recommendations on the similarity of the method performance and cost. This was done in an effort to meet our understanding of the crosswalking process, i.e., that the new test is similar based on payment data and methodology.

ASCLS appreciates the opportunity to submit comments on these coding changes. We urge you to seriously consider our comments and those of



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other organizations within the clinical laboratory industry. If you should have any questions concerning our comments, please do not hesitate to contact Elissa Passiment at (301)657-2768 or at elissap@ascls.org . ASCLS remain ready to work with CMS and thanks you again for the opportunity to submit these comments.

Sincerely,

Bernadette Bekken, CLS(NCA)
President, ASCLS

Enclosure