



July 18, 2011

Mr. Glenn McGuirk  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244-1850

Dear Mr. McGuirk:

The American Association for Clinical Chemistry (AACC) welcomes the opportunity to provide comments to the Centers for Medicare and Medicaid Services (CMS) regarding the newly created 2012 genetic testing codes. We support your efforts to establish more specific codes, which will more accurately inform the agency of the tests being performed and will assist it in determining appropriate payment levels.

AACC believes that most of the genetic tests published by CMS for public comment include a professional component that warrants its placement on the physician fee schedule (PFS). We suggest that CMS create a mechanism for assessing the level of professional input required for each test. All tests in need of professional interpretation should be placed on the PFS.

The remaining genetic tests, whereby the result alone often dictates the diagnosis or treatment, should be placed on the clinical laboratory fee schedule. We further recommend that CMS retain CPT 83912, molecular diagnostic interpretation and report, until a similar code or mechanism is created that permits qualified health care providers, such as PhD professional scientists, to continue to bill for the technical interpretation associated with these tests.

By way of background, AACC is the principal association of professional laboratory scientists--including MDs, PhDs and medical technologists. AACC's members develop and use chemical concepts, procedures, techniques and instrumentation in health-related investigations and work in hospitals, independent laboratories and the diagnostics industry worldwide. The AACC provides international leadership in advancing the practice and profession of clinical laboratory science and its application to health care. If you have any questions, please call me at (314) 362-0194, or Vince Stine, PhD, Director, Government Affairs, at (202) 835-8721.

Sincerely,

A handwritten signature in black ink that reads "Ann M. Gronowski". The signature is written in a cursive, flowing style.

Ann M. Gronowski, PhD  
President, AACC