



Better health through  
laboratory medicine.

April 11, 2023

The Honorable Richard Hudson  
2112 Rayburn House Office Building  
Washington, DC 20515

Dear Representative Hudson,

The American Association for Clinical Chemistry (AACC) endorses the Saving Access to Laboratory Services Act (SALSA), which would reform the Medicare clinical laboratory fee schedule (CLFS). The current process, set forth in the Protecting Access to Medicare Act (PAMA), utilizes a flawed payment methodology that imposes deeper cuts in laboratory payments than Congress anticipated.

In 2014, Congress passed PAMA which directed the Centers for Medicare and Medicaid Services (CMS) to rebase the CLFS to reflect private sector payment rates. Unfortunately, nearly all the data used to set the new fees comes from large commercial laboratories, which can perform testing more cheaply due to their economies of scale. The result is significant reductions in payment rates that adversely affect all providers.

According to the Medicare Payment Advisory Commission (MedPAC), the breadth and depth of CMS cuts reduced reimbursement to hospitals and physician offices for testing services by nine percent and six percent, respectively. This will only grow in the coming years. We are concerned that this trend, over time, may force facilities, particularly those in rural and underserved areas, to curtail or eliminate testing, thus limiting patient access to timely care.

If enacted, SALSA would correct several deficiencies in the earlier statute, such as using statistical sampling to ensure CMS obtains more representative payment data for setting fees. In addition, the measure would provide greater price stability by placing limits on payment increases and decreases and reducing the administrative burden on laboratories. AACC believes these changes will result in a more streamlined, accurate payment process. We look forward to working with you on this important issue.

AACC is a global scientific and medical professional organization dedicated to laboratory medicine and its application to healthcare. AACC brings together more than 50,000 clinical laboratory professionals, physicians, research scientists, and business leaders from around the world focused on clinical chemistry, molecular diagnostics, mass spectrometry, translational medicine, lab management, and other areas of progressing laboratory science. Since 1948, AACC has worked to advance the common interests of the field, providing programs that advance scientific collaboration, knowledge, expertise, and innovation.

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If you have any questions, please email Vince Stine, PhD, AACC's Senior Director of Government and Global Affairs, at [ystine@aacc.org](mailto:ystine@aacc.org).

Sincerely,

A handwritten signature in cursive script that reads "Shannon Haymond".

Shannon Haymond, PhD, DABCC, FAACC  
President, AACC