



Advancing Transfusion and
Cellular Therapies Worldwide

October 23, 2017

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

**Re: Medicare Clinical Laboratory Fee Schedule Private Payor Rate-
Based Payment System: Preliminary Payment Rates for 2018**

Dear Administrator Verma:

Thank you for the opportunity to submit comments in response to the preliminary payment rates for 2018 established under the Medicare clinical laboratory fee schedule (CLFS) private payor rate-based payment system.

AABB is an international, not-for-profit association representing individuals and institutions involved in the field of transfusion medicine and cellular therapies. The association is committed to improving health through the development and delivery of standards, accreditation, and educational programs that focus on optimizing patient and donor care and safety. AABB individual membership includes physicians, nurses, scientists, researchers, administrators, medical technologists, and other health care providers.

AABB is concerned that CMS' data used to determine the new payment rates for tests on the CLFS was deficient. As a result, the proposed payment rates established for most tests related to blood banking, transfusion medicine and cellular therapies on the CLFS are far too low. Additionally, the proposed payment rate for each test code is global, and does not reflect specific test descriptors, such as analyte descriptors for molecular pathology codes, which are currently used to differentiate the unique purposes of tests and associated payment rates under individual codes. AABB is concerned that the flawed reimbursement rates have the potential to stifle innovation and reduce Medicare beneficiaries' access to important laboratory tests.

AABB requests that CMS reassess the data collection methodology and process used to establish the proposed payment rates under the CLFS before implementing new rates.

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Additionally, AABB encourages CMS to ensure that the private payor data upon which the payment rates are based is complete and accurately represents the entire clinical laboratory market.

If you have any questions or need additional information, please contact Leah Stone, Director of Public Policy and Advocacy at 301-215-6554 or lmstone@aabb.org.

Sincerely,

A handwritten signature in black ink that reads "Mary Beth Bassett". The signature is written in a cursive, flowing style.

Mary Beth Bassett
AABB President