

December 29, 2025

CLARIFICATION FOR CLIA IMPLEMENTATION

BACKGROUND

This is an update to the Nov. 24, 2025, MCO Notice titled “*Revised Implementation Timeframes of CLIA Certification Data*”.

Clinical Laboratory Improvement Amendments (CLIA) Implementation Timeline:

- I. As of Dec. 1, 2025, MCOs will have 90 days to build a soft edit. The soft edit would not deny the CLIA claim, but it should be set up to allow the claim to process, but warn and notify the provider through the explanation of benefits (EOB)/explanation of payment (EOP) the applicable CLIA certification is not present in the HHSC Provider Enrollment Management System (PEMS) for the lab service/procedure billed, and needs to be updated in PEMS.
 - The EOB/EOP should be provider facing and should be informative and descriptive for providers to follow and update CLIA certification in PEMS.
 - A provider notification and an EOB/EOP notification is required to inform providers about the soft edit. Individual provider letters are not required.
- II. The soft edit must be implemented as soon as practical but no later than claims received for dates of service (DOS) March 1, 2026. The soft edit should be maintained through May 31, 2026.
 - This is an opportunity for MCOs to identify and perform outreach to providers to update PEMS with CLIA certification before a hard edit is in place.
- III. Hard edits must be implemented for claim DOS on and after June 1, 2026, to start denying claims if a provider bills for a lab service/procedure without the applicable CLIA certification in the PEMS Master Provider File (MPF).

Please note that the March 1, 2026, and June 1, 2026, implementation dates for the soft and hard edits are based on claim ‘DOS,’ so all MCOs are aligned, and the application of the requirements does not impact any adjusted claims with DOS prior to the implementation of the edits.

KEY DETAILS

HHSC has provided clarification for the attestations for making necessary configuration changes to the claim systems to accommodate the CLIA information and ensuring all payers are editing CLIA from the same source within the PEMS MPF. MCOs that have already implemented CLIA editing, can continue processing as normal as long as the MCO is also editing based on PEMS data in accordance with the two-phase implementation plan.

The FAQ attachment was prepared and finalized by taking questions from MCOs and providers from past correspondence and meetings.

- Version # 0.6: HHSC incorporated MCOs feedback from Nov. 14, 2025, through Dec. 17, 2025 ITC call and emails.

RESOURCES

[PEMS_CLIA FAQs_v0.6.pdf](#)

QUESTIONS

For any questions regarding this notice, please contact your Community Provider Performance Manager (provider representative). E-mail: ProviderRelationsInquiries@CommunityHealthChoice.org