

December 10, 2025

REVISED IMPLEMENTATION TIMEFRAMES OF CLIA CERTIFICATION DATA

BACKGROUND

This Notice is an update to the Aug. 21, 2025 Notice titled “*Update to CLIA Certification Data within PEMS MPF*” and to the Notice titled “*Delay of Implementation of CLIA Certification Data*” to provide an update on the PEMS Master Provider File (MPF) implementation for Clinical Laboratory Improvement Amendments (CLIA). In addition, HHSC has consolidated the latest questions and responses regarding Provider Enrollment and Management System (PEMS) MPF and CLIA data in an updated Frequently Asked Questions (FAQ) summary.

HHSC is providing additional information to assist in identifying CLIA certification types and billable procedure codes to ensure proper alignment of payments with CLIA rules. All providers that bill laboratory services must have CLIA certification for the procedure code being billed. All providers of laboratory services must comply with CLIA rules and regulations.

KEY DETAILS

HHSC has updated the implementation timeline for making necessary changes to the claim systems to accommodate the CLIA information as outlined in the attached FAQ.

Updated 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 warn and notify the provider if they bill for a procedure without appropriate CLIA certification to update their missing CLIA information in PEMS.

§ The explanation of benefits (EOB)/explanation of payment (EOP) found on the claim’s remittance and status (R&S) should be updated to inform providers to update PEMS with CLIA certification. 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 is required to inform providers about the soft edit and the upcoming hard edit. Individual provider letters are not required.

II. The soft edit must be implemented as soon as practical but no later than March 1, 2026. The edit must be applied by date of service (DOS).

§ This is an opportunity for MCOs to accomplish CLIA validation by identifying and performing outreach to providers to update PEMS with CLIA certification before a hard edit is in place.

III. Hard edits must be implemented for dates of service on and after June 1, 2026, to start denying claims if a provider bills for a procedure without appropriate CLIA certification based on CLIA data provided in the PEMS 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.

MCOs that have already implemented CLIA editing based on the previously sent quarterly CLIA/HCPSC list, can continue processing as normal until they switch to the soft edit. MCOs must communicate to providers about how their CLIA editing is changing.

Moving forward, HHSC will be providing an updated comprehensive list of CLIA CPT/HCPSC codes on a quarterly basis. This list includes payable and informational procedure codes. HHSC is currently in the process of reviewing additional codes to be added to the list and will provide it in a future notice.

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

Version # 0.5: HHSC incorporated MCOs feedback from Oct. 10, 2025, through Nov. 14, 2025, ITC call and emails.

RESOURCES

Policy or Operational Documents:	<p>TMPPM: Radiology and Laboratory Services Handbook: 2.1.1 Clinical Laboratory Improvement Amendments (CLIA) and 2.1.2 CLIA Requirements.</p> <p>https://www.cms.gov/files/document/mm12581-new-waived-tests.pdf</p> <p>https://www.cdc.gov/clia/docs/tests-granted-waived-status-under-clia.pdf</p> <p>https://www.cms.gov/Regulations-and-Guidance/Legislation/CLIA/Downloads/ppmplist.pdf</p> <p>https://www.cms.gov/Regulations-and-Guidance/Legislation/CLIA/Downloads/lccodes.pdf</p> <p>www.tmhp.com/topics/provider-enrollment/pems/licenses</p>
Attachments:	PEMS CLIA FAQ v.05

QUESTIONS

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