



# MEMORANDUM

**TO:** Regional Medical Laboratory, Inc. (RML) Hospital Clients  
**FROM:** Nadra Conner, Director Laboratory  
 Revenue Cycle Joshua Freitag,  
 Manager Laboratory Revenue Cycle  
**DATE:** January 1, 2019  
**SUBJECT:** 2019 CMS Enforcement of OPPS Packaging Policy

As you may be aware, beginning January 1, 2018, CMS revised the Outpatient Prospective Payment Schedule (OPPS) to include a laboratory date of service (DOS) exception pertaining to specific laboratory tests performed on hospital outpatients.

**On July 1, 2019**, CMS will enforce the requirement that the performing laboratory must bill for advanced diagnostic laboratory tests (ADLTs) and molecular pathology tests excluded from the hospital OPPS packaging policy, that are subject to the new laboratory DOS exception. Per CMS *“If all the requirements are met, the DOS of the test must be the date the test was performed, which effectively separates the laboratory test from the hospital outpatient encounter. As a result, the laboratory performing the test must bill Medicare directly for the test, instead of seeking payment from the hospital outpatient department.”*

For more information, please refer to the CMS Laboratory Date of Service Policy at:  
<https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/ClinicalLabFeeSched/Clinical-Lab-DOS-Policy.html>

To ensure the correct facility is billing for the qualifying tests on your Medicare Outpatients, RML requests you send the order with a bill patient billing indicator and either an IN1 interface segment or hard copy of insurance.

The most current list of qualifying tests is available at RML Online client memo section: <http://www.rmlonline.com/site/sections/353>

Performing & Billing Entities:

Regional Medical Lab   4142 S Mingo Rd., Tulsa, OK 74146
ARUP Laboratories   500 Chipeta Way, Salt Lake City, Utah 84108
Combimatrix-Invitae   1400 16th St, San Francisco, CA 94103
Interpace Diagnostics   Morris Corp Ctr 1, Bldg C; 300 Interpace Pkwy., Parsippany, NJ 07054
Oklahoma State Department of Health   1000 NE 10th, Oklahoma City, OK 73117
PerkinElmer   940 Winter St., Waltham, MA 02451
Prometheus Laboratories   9410 Carroll Park Dr, San Diego, CA 92121
Quest Diagnostics   33508 Ortega Hwy, San Juan Capistrano, CA 92690
Sequenom Laboratories   3595 John Hopkins Ct, San Diego, CA 92121
St. Francis Center for Genetic Testing   6161 S. Yale Ave., Tulsa, OK 74136
Tricore Reference Laboratories   1001 Woodward Pl. NE, Albuquerque, NM 87102

If you have any questions, please contact Joshua Freitag at 918-744-3131, ext. 30261 or email [Joshua.Freitag@ascension.org](mailto:Joshua.Freitag@ascension.org).