



2/25/2026

## Revised Implementation Timeframes of CLIA Certification Data

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### Attention: Providers

#### Background:

This notice is an update to the PEMS Master Provider File (MPF) implementation for Clinical Laboratory Improvement Amendments (CLIA). Additionally, 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.

#### 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.
  - A. 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.
  - B. A provider notification is required to inform providers about the soft edit and the upcoming hard edit. Individual provider letters are not required.
- II. MCOs must implement the soft edit as soon as practical but no later than March 1, 2026. The edit must be applied by date of service (DOS).
  - A. MCOs may implement soft editing before March 1, 2026.
  - B. MCOs must attest by March 6, 2026, that they have implemented the soft edit.
- III. MCOs must implement hard edits 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.

A. MCOs must attest by June 5, 2026, that they have implemented the hard edit.

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 /HCPCS list, can continue processing as normal until they switch to the soft edit.

Moving forward, HHSC will be providing an updated comprehensive list of CLIA CPT/HCPCS 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 MCO notice.

The FAQ attachment was prepared and finalized by taking questions from MCOs from past correspondence and meetings. Version # 0.5: HHSC incorporated MCOs feedback from Oct. 10, 2025, through Nov. 14, 2025, ITC call and emails.

**Action:**

On or before DOS March 1, 2026, MCOs are required to start warning providers of claims that lack the appropriate CLIA certification claims. All MCOs must attest no later than March 6, 2026, confirming that all system changes have been completed to enforce the soft editing based on CLIA data provided in the PEMS MPF.

The exact effective date for when MCOs are required to start denying claims that lack the appropriate CLIA certification are based on claims with DOS starting June 1, 2026. All MCOs must attest no later than June 5, 2026, confirming that all system changes have been completed to enforce the hard editing based on CLIA data provided in the PEMS MPF.

**Resources:**

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

If you have questions, need assistance or need further clarification, please contact Dell Children's Health Plan by emailing us at [shpproviderservices@seton.org](mailto:shpproviderservices@seton.org) or calling us at 1-512-324-3125, option 4 (TTY 7-1-1).