

05/04/2026

CLIA Implementation DELAYED

Background:

This MCO Notice is an update to the following past MCO Notices:

- April 23, 2026, MCO notice titled "*Notification of POTENTIAL Delay of Claim Denials for CLIA Information.*"
- February 23, 2026, MCO notice titled "*Clarification for CLIA Implementation.*"
- December 22, 2025, MCO notice titled "*Clarification for CLIA Implementation.*"
- November 24, 2025, MCO notice titled "*Revised Implementation Timeframes of CLIA Certification Data.*"

Due to delays in provider enrollment processing, the enrollment applications that require Health and Humans Services Commission (HHSC) or Office of the Inspector General (OIG) review are currently delayed by 90-120 business days. This delay impacts a provider's ability to maintain accurate CLIA information on their record in Provider Enrollment and Management System (PEMS). While a provider is waiting for their revalidation application to be processed, they are unable to submit other change requests in PEMS. A provider can also include their updated CLIA information as part of their revalidation request, but the CLIA information will not be approved and associated with their record until the entire revalidation request is approved.

Key Details:

To prevent provider impact, the June 1, 2026, CLIA implementation to complete any necessary changes for MCO claim systems to accommodate the CLIA hard edit to start denying claims that lack the appropriate CLIA certification based on PEMS data has been delayed until further notice. As a result, the CLIA attestation deadline of June 5, 2026, has also been delayed.

- MCOs that have implemented a soft edit for CLIA, will continue to keep this warning edit in place. However, MCOs may need to adjust their explanation of benefits (EOB) and/or explanation of payment (EOP) messages to the provider as appropriate.
- MCOs that have already implemented a hard edit for CLIA through their existing processes, can continue processing as normal and can delay using the PEMS data in accordance with the previous planned two-phase HHSC implementation approach.

HHSC has not yet determined a new effective date for when MCOs are required to start denying claims that lack the appropriate CLIA certification based on PEMS data. The current estimate is to delay the CLIA implementation for at least three months. HHSC will provide a new implementation date in future MCO notice.

An updated Frequently Asked Questions (FAQ) will be provided in future MCO notice.

HHSC will issue another provider notification in May 2026 to remind providers to update CLIA certifications within PEMS.

MCOs must continue to perform provider outreach and communicate that all providers of laboratory services must comply with the rules and regulations of CLIA. To meet these requirements, providers:

- Must submit their CLIA certifications in PEMS.
- May only bill for services that are covered under their current CLIA certification.

Updating CLIA Certifications in PEMS

Providers can update their CLIA information in PEMS through PEMS Maintenance – License transactions, PEMS Existing Enrollment transactions, or PEMS Revalidation transactions.

- If providers are disenrolled, they must update their CLIA information through a PEMS Reenrollment request.
- If providers are enrolled and outside of their revalidation window, they can update it through a PEMS Maintenance or PEMS Existing Enrollment request.
- If providers are enrolled and within their revalidation window, they can update their CLIA information through a PEMS Revalidation or PEMS Maintenance request if they have not yet submitted a Revalidation application. Providers that have already submitted a Revalidation application cannot access a PEMS Maintenance request.

For more information about updating CLIA certifications in PEMS, refer to www.tmhp.com/topics/provider-enrollment/pems/licenses.

Updating CLIA Information During Revalidation

Providers must update their CLIA information during their provider enrollment revalidation by providing the relevant information on the **License/Certification/Accreditation** tab in PEMS.

Providers can verify their revalidation date and enrollment information in PEMS. A provider can complete their revalidation up to 180 calendar days before their revalidation due date. For more information, visit [How to Apply for Enrollment | TMHP](#) page on tmhp.com, click on **Determine Your Application Type**, and scroll to the **Revalidation** heading.

Action:

As of June 1, 2026, MCOs are not required to use the PEMS Master Provider File (MPF) for CLIA data to deny claims.

MCOs that have implemented a soft edit for CLIA, will continue to keep this warning edit in place. However, MCOs may need to adjust their explanation of benefits (EOB) and/or explanation of payment (EOP) messages to the provider as appropriate.

MCOs that have already implemented a hard edit for CLIA through their existing processes, can continue processing as normal and can delay using the PEMS data in accordance with the previous planned two-phase HHSC implementation approach.

Resources:

Policy or Operational Documents:	Licenses/Certifications Accreditations TMHP
----------------------------------	---

Contact:

HHSC is providing MCOs with updated contact information related to CLIA to help ensure future inquiries are directed to the appropriate teams. Going forward, please direct your inquiries as follows:

- HHSC Encounter's Team MCO_Encounter_Data_Team@hhs.texas.gov

- Questions tied to the MCO scan call agenda topic for CLIA.
- **MCO Liaison mailbox** mcomailbox@tmhp.com
 - PEMS Master Provider File (MPF) CLIA processing related questions or escalations.
 - Escalations about a provider's enrollment or PEMS certification.
- **HHSC Medicaid Provider Enrollment** ProviderEnrollment@hhs.texas.gov
 - General provider enrollment questions such as policy or process questions.
- **HHSC Medical and Dental Benefits Policy** MedicaidBenefitRequest@hhsc.state.tx.us
 - Questions related to CLIA CPT/HCPCS data.

Contact:

View contacts listed in notices above.

Type: Action Required

To: CHIP; STAR; STAR+PLUS; STARHEALTH; STAR_KIDS

From: Operations