



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ELIZABETH HERTEL
DIRECTOR

September 4, 2025

TO: Interested Party

RE: Consultation Summary Project Number 2528-Lab - Billing for Services Performed by Reference Laboratories Under Arrangement with Enrolled Independent Clinical Laboratories

Thank you for your comment(s) to the Health Services Administration relative to Project Number 2528-Lab. Your comment(s) has been considered in the preparation of the final publication, a copy of which is attached for your information.

Responses to specific comments are addressed below.

Comment: Are enrolled referring laboratories able to utilize reference laboratories located outside of Michigan?

Response: There are no state location edits applicable to the service facility address field/locator on the claim. Medicaid's out-of-state/beyond borderland provider policy requirements will only impact the billing referring laboratory listed on the claim or prior authorization request.

Comment: Is this proposed policy simply a clarification of the current billing policy for reference labs? What will this rule change accomplish?

Response: Medicaid's current policy only allows enrolled hospitals to bill for services performed by an external reference laboratory under arrangement. Other laboratory types are not allowed to bill for referred services. Under the proposed policy, providers enrolled as an independent laboratory will now be allowed to bill Medicaid for tests referred to an external reference laboratory for processing if they meet the requirements outlined within the proposed policy.

Thank you for your inquiry. We trust that previous responses addressed the concerns and questions noted. If you wish to comment further, send your comments to Adriena Krul-Hall at krulhalla@michigan.gov.

Sincerely,

A handwritten signature in black ink that reads "Meghan Groen". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Meghan Groen, Director
Health Services Administration