



May 29, 2026

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1784-P
7500 Security Boulevard
Baltimore, MD 21244

Re: CY 2027 Clinical Laboratory Fee Schedule Recommendations

The Association for Diagnostics & Laboratory Medicine (ADLM) appreciates the opportunity to provide input to the Centers for Medicare and Medicaid Services regarding its Calendar Year (CY) 2027 Clinical Laboratory Fee Schedule payment determinations. A comment is below:

Code:	87183
Long Code Descriptor:	Susceptibility studies, antimicrobial agent; carbapenem resistance genes (eg, bla _{KPC} , bla _{NDM} , bla _{VIM} , bla _{OXA-48} , bla _{IMP}), amplified probe technique, per isolate
Recommendation:	Gapfill
Rationale:	Existing codes for general nucleic acid probe testing and organism identification do not adequately reflect the specific resistance-gene targets and methodology. Gapfill would allow payment to be set based on the resources and costs associated with this distinct molecular resistance test.

ADLM is a global scientific and medical professional organization dedicated to clinical laboratory science and its application to healthcare. ADLM brings together clinical laboratory professionals, physicians, research scientists, and business leaders from around the world focused on clinical chemistry, molecular diagnostics, mass spectrometry, microbiology, translational medicine, lab management, and other areas of clinical laboratory science to advance healthcare collaboration, knowledge, expertise, and innovation.

We look forward to working with you on this important issue. If you have any questions, please email Vince Stine, PhD, ADLM's Chief Policy Officer, at vstine@myadlm.org, or Evan Fortman, MPA, ADLM's Manager of Government Affairs at efortman@myadlm.org.

Sincerely,

A handwritten signature in dark ink, reading "Paul Jannetto".

Paul J. Jannetto, Ph.D., DABCC, FAACC
President, ADLM