



## COLLEGE of AMERICAN PATHOLOGISTS

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September 11, 2025

The Honorable Richard Hudson  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Gus Bilirakis  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Scott Peters  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Brian Fitzpatrick  
United State House of Representatives  
Washington, D.C. 20515

The Honorable Raja Krishnamoorthi  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Thom Tillis  
United States Senate  
Washington, D.C. 20510

The Honorable Raphael Warnock  
United States Senate  
Washington, D.C. 20510

Dear Representatives Hudson, Bilirakis, Peters, Fitzpatrick, Krishnamoorthi and Senators Tillis and Warnock:

On behalf of the College of American Pathologists (CAP), I want to thank you for introducing the Reforming and Enhancing Sustainable Updates to Laboratory Testing Services Act, which would permanently improve rate setting under the Medicare Clinical Laboratory Fee Schedule (CLFS). As the world's largest organization of board-certified pathologists and leading provider of laboratory accreditation and proficiency testing programs, the CAP serves patients, pathologists, and the public by fostering and advocating excellence in the practice of pathology and laboratory medicine worldwide. As physicians specializing in the diagnosis of disease through laboratory methods, pathologists have a long track record of delivering high quality diagnostic services to patients and other physicians.

The CAP has long advocated for permanent stability and relief from the highly flawed data collection and validation methods currently stipulated by the Protecting Access to Medicare Act (PAMA; P.L. 113-93). As you know, the first round of data collection in 2017 after PAMA was passed revealed that the methodology was severely flawed; failing to capture an adequate and representative private market data sample, leaving out virtually all hospital outreach laboratories, and significantly under sampling physician office laboratories. The significant under sampling led to nearly \$4 billion in cuts to those laboratories providing the most commonly ordered test services for Medicare beneficiaries.

Under the current structure dictated by PAMA, the severity of reimbursement reductions would undermine the operational infrastructure of clinical laboratories in the United States. We appreciate Congress' continued intervention on a bipartisan basis, which has delayed the next CLFS reporting

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period six times and delayed cuts five times in order to maintain access to laboratory services for patients. Without a sustainable solution though, laboratories are once again facing drastic cuts of up to 15% in 2026.

Access to laboratory services is critical to patients receiving timely, accurate diagnoses. Supporting these services reduces long-term healthcare costs by preventing complications and unnecessary hospitalizations and helps our most vulnerable patients stay healthy. The RESULTS Act will benefit our country's critical laboratory infrastructure by averting needless loss in access to care, and allowing laboratories to continue providing timely, high quality clinical services to patients. It will require the Centers for Medicare & Medicaid Services (CMS) to obtain information about commercial payor rates for widely available clinical laboratory services from an independent third-party database and use this data to calculate Medicare CLFS rates. This will ensure CMS is using data that is truly representative of market rates, thereby maintaining access to critical tests for heart disease, cancer, diabetes, and other diseases, significantly reducing the reporting burden on clinical laboratories, and streamlining the work of CMS. If this foundational reform is enacted, Congress will no longer need to pass temporary delays to prevent deep cuts to laboratory services year after year.

The CAP appreciates your leadership and thanks you for introducing this bill to bring long-term stability to both the clinical laboratory industry and patients alike. We look forward to working with you to advance this legislation. Should you have questions please contact Hannah Burriss at [hburriss@cap.org](mailto:hburriss@cap.org) or via phone at 202-354-7139.

Sincerely,

Donald S. Karcher, MD, FCAP  
President, College of American Pathologists