

## Laboratory Comment

The information provided to date on the requirements for submitting data elements is very confusing and sounds like it will require significant programming to glean the required data. In addition third party payers often make mistakes with reimbursement on an individual claim submission basis which could cause the erroneous submission of data. The process of locating the lowest payments from all third party payers seems overly burdensome and is likely to result in errors that could cause DHCS to ultimately not come to the desired conclusion on reimbursement rates. It would appear that a much simpler method such as a straight percent of Medicare reimbursement would be just as effective without undue burden on providers.

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Sent via e-mail on 9/5/12