



October 7, 2025

VIA Electronic Mail to: clfs_inquiries@cms.hhs.gov

RE: 2025 Gapfill Final MAC Recommendations

Dear Ms. Shirey-Losso:

On behalf of the Point of Care Testing Association (POCTA), we are pleased to provide comments on the 2025 Gapfill Final MAC Recommendations. POCTA is a collaborative effort among manufacturers of point of care (POC) diagnostic technologies that enable clinicians to monitor chronic conditions, diagnose illnesses, and provide timely information for patients in a variety of care settings, from physician offices to pharmacies to community centers to non-hospital facilities. POCTA seeks to facilitate access to safe, effective, and cost-effective patient testing at the time of treatment. POCTA works to develop reimbursement and regulatory policies that can improve health outcomes by supporting access to POC testing.

We reviewed the CY 2026 CLFS Preliminary Determinations, and strongly support the adjusted MAC final determinations for the following codes:

HCPCS	Descriptor	Median
82233	Beta-amyloid; 1-40 (Abeta 40)	\$128.92
82234	Beta-amyloid; 1-42 (Abeta 42)	\$128.92
83884	Neurofilament light chain (NfL)	\$116.23
84393	Tau, phosphorylated (eg, pTau 181, pTau 217), each	\$128.92
84394	Tau, total (tTau)	\$128.92

We appreciate that the MACs considered and responded to stakeholder comments, which provided additional detail on the resources required to perform these tests. The above rates are generally consistent with both the resource needs associated with furnishing these tests and the comments POCTA submitted in response to the preliminary MAC determinations.

We thank you in advance for your consideration of these comments. If you have any questions please contact Mike Ryan at 202.756.8088, or via e-mail to mryan@mwe.com,

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Ryan', with a long horizontal line extending to the right.

Mike Ryan
On behalf of the Point of Care Testing Association