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DATE: November 21, 2023

TO: MUSC's Industry Sponsored Research Collaborators

FROM: Lori L. McMahon, PhD  
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Associate Vice President for Clinical  
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Royce Sampson, MSN, RN, CRA  
Director, Office of Clinical Research  
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Re.: Prospective Reimbursement Analysis Fees

Effective June 1, 2023, a change in pricing was put into effect all clinical research studies are required to have a Prospective Reimbursement Analysis (PRA) review and document reviews for any protocol amendments in order to be in compliance with federal billing regulations. The MUSC Office of Clinical Research (OCR) is responsible for ensuring enterprise-wide research billing compliance utilizing the Prospective Reimbursement Analysis (PRA) review process. A PRA review includes an objective determination of all billable services and funding sources as well as what can and cannot be billed to third party payers using the National Coverage Determination (NCDs) and the Local Coverage Determinations (LCDs) adopted by the Centers for Medicare and Medicaid Services (CMS), as well as clinical care guidelines. The PRA is used by the MUSC Health Revenue System as a guide to ensure items are correctly billed to insurance or the study/grant account. Industry-funded clinical research studies are assessed a \$2,500 fee for the initial analysis and an OCR PRA Amendment Document Review of \$50 is assessed for each study amendment review. For studies with changes to billable items and services requiring a change to the PRA a simple amendment fee of \$500 or a complex amendment fee of \$1000 will be charged depending on the level of complexity in the required change.

For more information, please contact the Office of Clinical Research at [musc-ocr@musc.edu](mailto:musc-ocr@musc.edu) or at 843-792-7900.

Signature: 

Date: 11 (22) 23

Name: Patrick Flume, MD

Title: Associate Vice President for Clinical Research,  
Distinguished University Professor

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