



### Protecting Access to Medicare Act (PAMA) Timeline

<i>Date</i>	<i>PAMA Development</i>
April 1, 2014	Enactment of PAMA. Section 216 establishes Medicare policies for clinical diagnostic laboratory tests including reporting of private sector payment rates and establishment of market-based payment.
June 30, 2015	Date specified in statute for establishment of parameters for data collection through notice and comment rulemaking
October 1, 2015	Proposed Rule for Medicare Clinical Diagnostic Laboratory Tests Payment System published
June 23, 2016	Publication of Final Rule for Medicare Clinical Diagnostic Laboratory Tests Payment System published
August 5, 2016	CMS Listing of HCPCS codes for collection and reporting for initial reporting period (January 1 – March 30, 2017) posted
August 8, 2016	CMS Guidance to Laboratories for Collecting and Reporting Data for the Private Payor Rate-Based Payment System posted
September 13, 2016	Fee-For-Service Data Collection System: Clinical Laboratory Fee Schedule Data Reporting Template released
October 2016	CMS Frequently Asked Questions on Medicare Clinical Diagnostic Laboratory Tests Payment System Final Rule released
November 2, 2016	CMS Conference Call on Data Reporting Required by PAMA
January 4, 2017	Additional Guidance for Clinical Laboratories as Data Reporting Begins released
January 9, 2017	CLFS User Manual released
March 9, 2017	Updated Frequently Asked Questions Regarding Applicable Laboratory Status released
March 30, 2017	Announcement of 60-day period of “enforcement discretion” through May 30, 2017 allowing applicable laboratories an additional 60 days report private payor data required under PAMA to CMS without fear of penalty
September 22, 2017	CY 2018 Preliminary Private-Payor Rate-Based CLFS released
November 22, 2017	CY 2018 Final Private Payor Rate-Based CLFS released
December 11, 2017	ACLA files lawsuit against HHS in U.S. District Court for the District of Columbia ( <i>ACLA v. Azar</i> )
April 9, 2018	ACLA files motion for summary judgment in <i>ACLA v. Azar</i>

July 12, 2018	CMS releases proposed FFS rule including PAMA provisions
October 15, 2018	ACLA files notice of appeal in U.S. Appeals Court for District of Columbia
January 22, 2019	CMS call on Clinical Diagnostic Laboratory Collection and Reporting of Private Payor Rates
February 25, 2019	HHS files brief in <i>ACLA v. Azar</i> appeal
February 27, 2019	CMS releases guidance on CY 2019 PFS final rule changes impacting PAMA data collection and reporting
March 18, 2019	ACLA files reply brief in <i>ACLA v. Azar</i> appeal
April 23, 2019	Oral arguments in <i>ACLA v. Azar</i> appeal scheduled in the U.S. Court of Appeals for the District of Columbia Circuit
<b><i>Future Data Collection / Reporting Periods for Clinical Diagnostic Laboratory Tests</i></b>	
January 1 – June 30, 2019	CDLT Data Collection Period: Labs collect private payer volumes data (applicable information)
January 1 – March 31, 2020	CDLT Data Reporting Period: Labs report applicable information to CMS
January 1, 2021	New Medicare CLFS PAMA-based rates go into effect.