



Protecting Access to Medicare Act (PAMA) Timeline

Date	PAMA Litigation Timeline
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 23, 2016	Final Rule for Medicare Clinical Diagnostic Laboratory Tests Payment System published.
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 (ACLA v. Azar).
September 21, 2018	U.S. District Court for the District of Columbia issues decision in <i>ACLA v. Azar</i> .
October 15, 2018	ACLA files notice of appeal in U.S. Court for District of Columbia.
November 1, 2018	CMS releases final CY 2019 Physician Fee Schedule rule in which CMS changed the definition of applicable laboratory to adopt the use of the 14X bill type to allow additional hospital outreach laboratories to meet the requirements to report.
December 4, 2018	ACLA files opening brief in <i>ACLA v. Azar</i> appeal.
December 11, 2018	College of American Pathologists, the Advanced Medical Technology Association, and the National Association for the Support of Long Term Care and the American Association of Bioanalysts/National Independent Laboratory Association file amicus briefs in support of ACLA in <i>ACLA v. Azar</i> .
July 30, 2019	Opinion of the U.S. Court for the District of Columbia Circuit, <i>ACLA v. Azar</i> .
December 20, 2019	LAB Act signed into law delayed PAMA reporting until 2021.
March 27, 2020	CARES Act delayed reporting period by additional year until 2022.
March 30, 2021	U.S. District Court for the District of Columbia memorandum opinion , <i>ACLA v. Becerra</i> , dismissing case for lack of subject matter jurisdiction.
May 28, 2021	ACLA files notice of appeal in U.S. Court for the District of Columbia.
September 21, 2021	ACLA files opening brief in <i>ACLA v. Becerra</i> appeal.
July 15, 2022	U.S. Court of Appeals for the District Court of Columbia issues decision in ACLA's favor on both procedural issues and substantive claims. Relief is prospective.