

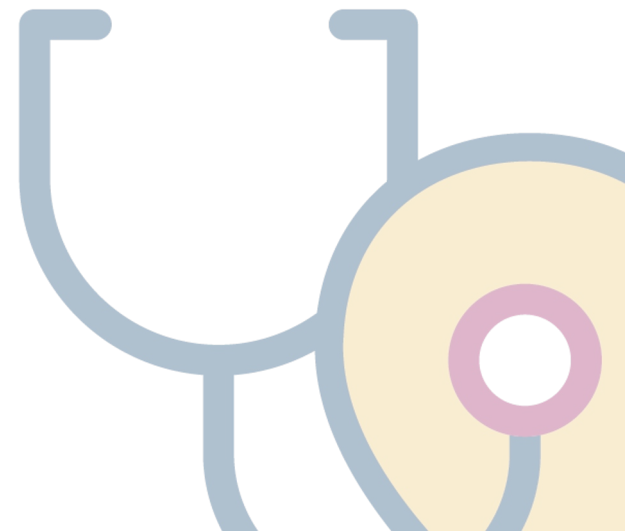


UPDATING PAMA TIMELINES

November 2023

Mike Ryan, McDermott Will & Emery

mryan@mwe.com



CLFS Ratesetting Under PAMA

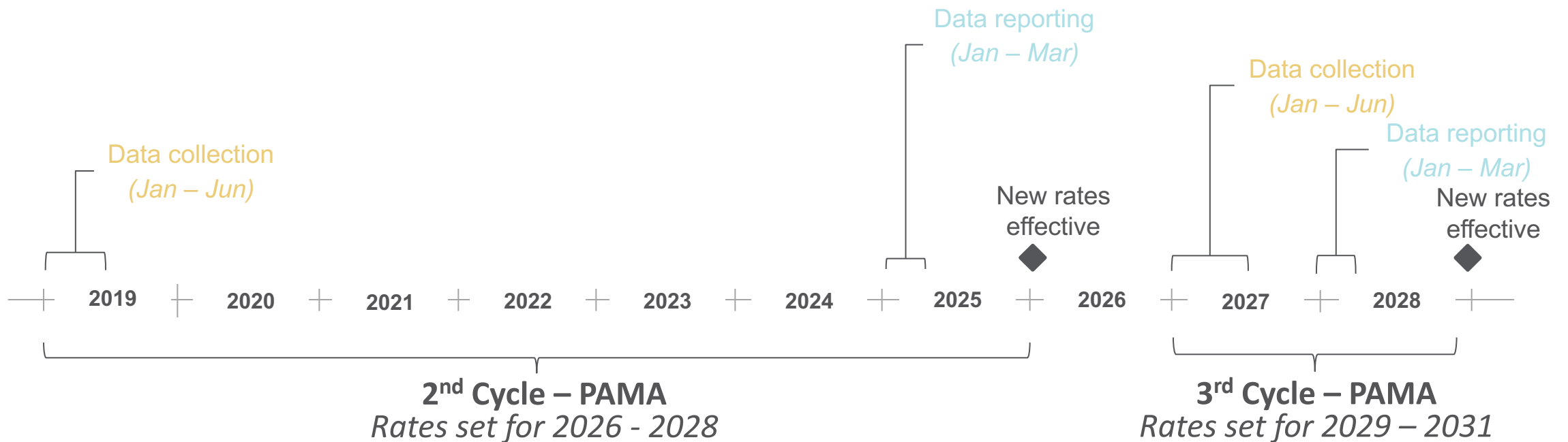
Background

- CLFS rates for clinical diagnostic laboratory tests (CDLTs) are updated periodically based on private payer data reported to CMS
- Update process involves two important periods:
 - Data collection period – private payer data collected by labs
 - Data reporting period – private payer data reported by labs to CMS
- In general:
 - Collection period occurs in the year prior to the reporting period; and
 - CLFS rates are updated every 3 years

CLFS Ratesetting under PAMA

Date collection, reporting and implementation timeline

- However, several recent laws (e.g., HR 6363 (2023)) have substantially delayed the usual reporting and ratesetting cycle



PAMA Updates

Current schedules for collection, reporting, and ratesetting

Next CLFS rate update

- Collection period: **January 1, 2019 – June 30, 2019**
- Reporting period: **January 1, 2025 – March 31, 2025**
- Rates effective: January 1, 2026 – December 31, 2028

Future CLFS update (1)

- Collection period: January 1, 2027 – June 30, 2027
- Reporting period: January 1, 2028 – March 31, 2028
- Rates effective: January 1, 2029 – December 31, 2031

Future CLFS update (2)

- Collection period: January 1, 2030 – June 30, 2030
- Reporting period: January 1, 2031 – March 31, 2031
- Rates effective: January 1, 2032 – December 31, 2034

Codes that become effective from 2020-2025 will not have data collected from the first half of 2019 to set rates for 2026-2028

Unclear how CMS will handle these codes – i.e., whether go through the crosswalk / gapfill determination process all over again

CLFS Ratesetting under PAMA

Maximum annual rate reductions

- PAMA limits the percentage decrease in the CLFS rate for any particular code for each year
 - 10% for 2017-2020
 - 0% for each of 2021-2024
 - 15% for each of 2025-2027



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