**Reporting Data to Meet PAMA Requirements**

Once you have determined that your laboratory is applicable to report PAMA data, the CAP recommends that you or designated staff follow these steps to register your laboratory and designate the Data Submitter and Data Certifier who will upload and certify the data.

Clinical laboratories will need to **appoint two separate** people to submit and certify lab payment data submitted to the new clinical laboratory fee schedule (CLFS) data collection system, which will be used to set Medicare payment rates for labs beginning in 2018.

**Laboratory Registration Steps**

The following items are needed to register your lab:
- Official Laboratory Name
- Tax Identification Number (TIN) and type
- All associated National Provider Identifiers (NPI)
- All associated CMS Certification Numbers (CCN)

The Centers for Medicare and Medicaid Services (CMS) released the preliminary steps for data submission. If your laboratory qualifies and must report data, here are the following steps to submit the data:

1. Confirm your enrollment data in the Provider Enrollment, Chain and Ownership System (PECOS) is correct
2. Identify who will submit and certify your CLFS data. **These 2 individuals must register** in the Enterprise Identity Management system  (EIDM)
3. Request a *CLFS submitter* or *certifier role* in the Fee-for-Service Data Collection System
4. Make sure your laboratory is registered with the CMS.

As the CMS concedes, the registration process detailed below is the most time consuming step for users of the Fee-for-Service Data Collection System (FFSDCS).

1. To register, log in to the CMS's Enterprise Portal at portal.cms.gov. Once there register for a CMS EIDM username and password, which is different from the CMS Enterprise User Administration (EUA) account.
2. Select a role as either the CLFS data submitter or data certifier. You will be asked to go through a remote identity proofing process.
3. Request access to the FFSDCS, which entails selecting the CLFS submitter or certifier role. *Approval of the request for the specific role may require up to 72 hours and if confirmed by email from the CMS portal and EIDM system.*

4. Once your registration is approved, you will be asked to register a "multifactor authentication token device", or code, a one-time user-only password that is granted to establish the relationship between the CMS, the CLFS submitter, and certifier. The "device" or code is valid for one week, and is to be shared by the CLFS submitter with the CLFS certifier to complete certifier registration.
5. You will go through a secondary registration process to supply your laboratory name, your reporting tax identification number, any NPIs associated with this tax ID number, and any CMS certification numbers.
6. This information will be submitted to the PECOS repository for validation.

**Role for the Data Submitter**

Important items to remember for the Data Submitter:
- The name of Submitter will be verified against the CMS PECOS by the reporting TIN.
- Your registration may require manual validation if the name verification fails.
- Make sure PECOS is updated prior to EIDM registration
- Generate and share the one time password (OTP) with your certifier

Once the submitter has completed registration, the submitter will select one of two options for submitting data: file upload or manual entry.

To use the file upload method, submitters will need to download a CSV [file data template](#) from the PAMA webpage. ***This is the best option for laboratories submitting a large amount of data.*** However, if you have a small amount of data to submit, the better option is likely manual entry.

For each test the submitter will need to fill in the HCPCS code, the payment rate, volume and NPI. If an applicable laboratory has more than one payment rate for the same private payer for the same tests or more than one payment rate for different payers for the same tests, the reporting entity will report each such payment rate and volume for the tests. The system will accept duplicate HCPCS codes within your submission.

Next, the submitter will upload the data. The system will accept the submitter's file, pass it through validation rules largely to verify formatting such as appropriate number of digits and decimal point placement, and give the results of the submission. If any rows do not pass the validation rules, the submitter will be notified. The data will not be saved until all rows have passed validation.

**Role for the Data Certifier**

The data certifier must also go through the EIDM registration process as described above. Once registered, the certifier can review any data submitted by their organization. However, *if any corrections are needed, those must be made by the data submitter.* The certifier simply has the option to register and to review the data but not to modify the data.

Data certification of accuracy and completeness of applicable information must be done either by the President, CEO, or CFO of an applicable laboratory or a direct report to whom the individual above has delegated authority.

Once the review is complete, the certifier will need to attest that they have certified all the data. *Once the data are certified, that data is not accessible to the laboratory until the next reporting period.*

Download additional details available on the CMS' website.