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Ms. Nadia Massuda
Division of Cost Reporting
Centers for Medicare and Medicaid Services
Baltimore, MD 21244

MORE HFS DRAFT 2552-10 COMMENTS

On August 3, 2009, HFS submitted comments on the Draft 2552-10. Subsequently, we have been putting numbers in the forms, and have come across additional comments. Please add the comments below, to the original HFS comments.

The instructions for the calculation of line 37 on W/S E-4, page 40-213 (the old line 12 on E-3 part IV), for inpatient cost, now includes the SNF, W/S D-1 line 74 “cost”, as well as the E-3 part VI, line 4 “cost” (RUG payments and pass through costs). This is double counting the SNF “cost”, and we believe is incorrect. The reference to E-3 part VI, line 4, should be removed.

The instructions for the calculation of line 7 on W/S L part I, page 40-264, include the Outlier payments on line 2. The 2552-96 did NOT. We believe the 2552-10 is incorrect, and that line 2 should be removed from the instructions for L part I, line 7.

Once we begin programming, I am sure there will be other comments, but we can address those as they arise.

1. Page 40-510, Form, W/S S-3 part I, lines 28 and 29 are for the Hospital and the IRF. Why aren't lines 2 and 2.01 similarly “standard lines”? It seems inconsistent to have to subscript line 2.01, which is more likely than “line 29” for the IRF. Please add line “2.01” for the IRF and renumber the form.
2. Page 40-510, Form, W/S S-3 part I, line 5, column 1 should be shaded.
3. Page 40-510, Form, W/S S-3 part I, lines 14 and 15, columns 2 and 3, should be OPEN.
4. Page 40-512, Form, W/S S-3 part II, column 1, W/S A line number, should be shaded for all but lines 1 and 7; and a footnote for line 10, that it is from W/S A, sum of lines 20, 23, 40-42, 45, 45.01, 46, 94, 95, 98-101, 105-112, 114, 115-117, and 190-194.
5. Page 40-513, Form, W/S S-3 part II, column 1, W/S A line number, should be shaded for all but lines 1 and 7; and a footnote for line 10 = W/S A sum of lines 20, 23, 40-42, 45, 45.01, 46, 94, 95, 98-101, 105-112, 114, 115-117, and 190-194.
6. Page 40-514, Form, W/S S-3 part II, lines 26-43, column 1, W/S A line number, should be shaded for lines 28, 33, and 35.
7. Page 40-515, Form, W/S S-3 part III, column 1, should be shaded for W/S A line numbers.
8. Page 40-63, W/S S-3 part II, last paragraph for lines 26-43, the penultimate line references “line 13”. This should be line 7.
9. Page 40-67, W/S S-4, lines 21-32, 3rd line references “line 40”. This should be line 36.

10. Page 40-516, W/S S-4, Form, lines 21-38, columns 5 and 6 (SCIC), were eliminated effective 1/1/2008 and after, and should be removed from S-4.
11. Page 40-68, W/S S-4, top of page, references "column 5, SCIC". This should be deleted.
12. Page 40-72, W/S S-7, lines 59-64, 5th line, "Enter in column 1 the ratio...". This should be column 2. Two lines down there is a reference to "column 2". This should be column 3. Also, column 1 instructions should be added for the "Expenses".
13. Page 40-76, W/S S-9, just above "line 9", there is a reference to "...column 6 line 11". This should be line 8.
14. Page 40-118, my original comment #99, is wrong. Please ignore it.
15. Page 40-119, W/S B, 3rd paragraph for J-1 transfer, references "J-1 part I, column 26, line 12". This should be line 22.
16. Page 40-122, W/S B part II, last paragraph references line 193 in 1st line. This should be line 194. The 3rd line references "column 18 through 23". This should be 19 through 23.
17. Page 40-127, W/S C, 1st paragraph, 7th line, references W/S D-4. This should be D-3.
18. Page 40-128, W/S C transfer reference has "lines 31-35". This should be lines 31-36, to D-1 lines 43-47.
19. Page 40-565, Form, W/S D part I, line 200, column 5, should be shaded.
20. Page 40-131, W/S D part II, column 1, last line references "D-1 line 81". This should be line 80.
21. Page 40-566, Form D part II, check boxes at the top are IRF then IPF. All through the report, IPF is first, as on D part IV, page 40-568, check boxes, so D part II should be changed.
22. Page 40-132, W/S D part III, column 2, 7th line, references "S-2 line 42". This should be line 37.
23. Page 40-133, W/S D part III, top of page, references SNF, NF or ICF/MR, using W/S E-3 part VI. E-3 part VI is for SNF, T.18 ONLY, so any references to these other components should be deleted. This same paragraph also references E-3 part VII, line 8, which is CHARGES. This should be changed – see #24 below. Same for page 40-134, column 13, 2nd paragraph.
24. Page 40-594, W/S E-3 part VII, for Titles 5 and 19, ONLY addresses "cost" reimbursement. The old E-3 part III in the 2552-96 allowed PPS on lines 24-33, and this same accommodation of PPS should be added to E-3 part VII. Then the transfer reference in my comment #23 above, would be from D part III, line 44, column 9, to E-3 part VII, line xx (the old 2552-96 E-3 part III, line 28).
25. Page 40-153, W/S D part IV, column 1, last line references "D-1 part IV, line 82". This should be line 80.
26. Page 40-568, Form D part IV, line 200, columns 8 and 9, should be shaded for the RCC "total". Also, line 200, column 11, should be OPEN, not shaded.
27. Page 40-570, Form, W/S D part V, line 58, column 2 should be shaded as it was in the 2552-96 for line 45.
28. Page 40-570, Form, W/S D part V, line 95, Ambulance, is shaded for columns 2, 5, and 7. Since this Form has check boxes for T.5 and T.19, isn't it possible to have ambulance charges for these Titles? If so, then the shading should be OPENED, and an edit added to ensure T.18 is zero.

29. Page 40-570, Form, W/S D part V, line 201, columns 2, 3, and 4, should be OPEN, not shaded. Similarly, page 40-137, D part V instructions, lines 201 and 202, should include "column 2", as well as 3, 4, or 6 and 7.
30. Page 40-145, W/S D-1, lines 43-37, column 1, references "C part I, lines 31 through 36". This should be 31 through 35.
31. Page 40-146, W/S D-1, line 49, references "transfer to E-3 part VI, line 1". This should be E-3 part VI, as part VI is for PPS SNF for Medicare.
32. Page 40-146, W/S D-1, line 66, says transfer to E-2 line 1. This is ONLY for CAH, as SW/SNF is PPS and E-2 line 1 is INPUT. The end of these line 66 instructions should have added "for CAH".
33. Page 40-149, W/S D-1, line 80, 1st line has "...on line 78 by the cost on line 79...". This should be "cost per diem on line 79".
34. Page 40-150, W/S D-1, top of page, references "Lines 81 to 83". This should be "81-84", and lines 83 and 84 added to the Form. This will then agree with the standard columns 1, 2, and 3, on W/S D part III, from which this data transfers.
35. Page 40-155, W/S D-2, part III, transfer reference has Subprovider as "line 44" and SNF as Line 45". This should be lines 44, 45, or 46, as applicable; and line 47 for SNF.
36. Page 40-156, W/S D-3, Note at the bottom of the page, references "D-6" in the last line. This should be D-4.
37. Page 40-157, W/S D-3, line 91, instructions should be deleted. This most likely was intended to be for Observation Beds, but the paragraph above covers this. This was also in the 2552-96 in error, and should have been deleted from there.
38. Page 40-157, W/S D-3, Note at the bottom of the page, references "line 103" in the first line. This should be line 202.
39. Page 40-160, W/S D-4, line 43 – my original comment #138 referenced line 43 should be "37 through 41". This actually should be "37 through 42".
40. Page 40-161, W/S D-4, part III, line 53, references "D-5 part II, column 3, lines 20, 21, 22, and 23." This should be "D-5 part II, lines 23 through 29, as applicable."
41. Page 40-582, Form, E part A, lines 13 and 14, appear to have a "column zero". However, the instructions are silent as to how to use column zero. The Form line 14 states you enter a 1 in column zero, but line 13 has nothing. The instructions should specifically state how these "column zero" amounts are used. It appears a "one" is input to indicate to use or include this line in the "divide by the number of lines greater than zero". This needs to be clarified.
42. Page 40-583, Form, E part A, line 46, parenthetical has "line 45 x 43 x 41" This should be line 45 x 44 x 41.
43. Page 40-263, W/S L part I, line 4, there are two paragraphs on how to compute the Medicaid days. The last paragraph is obsolete and should be deleted.
44. Page 40-213, W/S E-4, line 37, my original comment #171, should be ignored, as the "line 4" reference is correct, not line 5, as I indicated. However, this is NOT consistent with the 2552-96 instructions for E-3 part IV, line 12. Line 12 did NOT include the SNF RUG payments, nor any Pass Through costs. WHY this change in the 2552-10?
45. Page 40-213, W/S E-4, line 40, does NOT reference the new W/S E-3 parts II, III, and IV for the IPF, IRF and LTCH. It should be E-3 part II, line 17; E-3 part III, line 18; E-3 part IV, line 8. Also, E-3 part VI for SNF, does NOT have a line for Primary Payer payments, as did the 2552-96, E-3 part III, line 7. This line should be added, and then

included in E-4 line 40. Also, the reference for E-3 part VI, line 5 is wrong. This is outpatient cost from D part V, not inpatient.

46. Page 40-172, W/S E part A, line 58, references W/S D part IV, column 13. This should be column 11. As noted above in #26, line 200, column 11 should be OPEN.
47. Page 40-179, W/S E part B, line 37, the instructions are missing reference to "line 35 hospital and subproviders only". The parenthetical on the Form, page 40-584, correctly references line 35, as should the instructions.
48. Page 40-584, Form, W/S E part B, the right column line numbers missed lines 38 and 41. The form needs to be renumbered from lines 39-46 to be 38-44.
49. Page 40-188, W/S E-3 part I, line 16, references D part IV, column 13, line 200. This should be column 11 (column 13 is O/P and E-3 part I is I/P).
50. Page 40-190, W/S E-3 part II, 2nd paragraph references "E-3 part I" in the second line. This should be E-3 part II.
51. Page 40-589, Form, W/S E-3 part II, line 22, parenthetical is backwards. It should be "line 20 minus line 21" (not 21 minus 20).
52. Page 40-192, W/S E-3 part II, line 28, last line references "D part IV, column 13, line 200". This should be column 11.
53. Page 40-192, W/S E-3 part II, line 31, reads "sum of lines 25, 26, and 28". The reference to line 25 should be deleted, as this is dual eligible bad debts.
54. Page 40-226, W/S H-3, NOTE below columns 6-9, references "column 8, line 9" in the penultimate line. This should be column 8, line 16.
55. Page 40-227, W/S H-3, "column 4 lines 9-11" references column 4 Visits, but column 4 is shaded. What should this be?
56. Page 40-611, Form H-3, lines 15 and 16, column 1, reference the transfer from H-5. This transfer reference should be H-2.
57. Page 40-228, W/S H-3, first paragraph, references "line 8 and line 9". This should be line 15 and line 16.
58. Page 40-231, W/S H-4, lines 11-24 paragraph, 5th, 6th, and 7th lines, reference "lines 21 through 23". These should all be lines 22 through 24.
59. Page 40-233, W/S H-5, line 4 references "line 42" twice. These should be line 38.