



Overview

Agenda

- HFS Introduction
- HFS MCR Software Update
- MCR Update T17
- Clarifications
- Open items (PRA Notice)
- Other Form Updates
- Amended Reports
- FFY 2023 Final Rule
- HFS Auditor
- HFS IRIS
- Questions

11/1/2022



About HFS

- Small Company in Elk Grove, CA.
- 41 years experience making MCR software.
- HFS makes Medicare Cost Reporting software for Hospitals, Skilled Nursing Facilities, Home Health Agencies, CMHC, RHC, FQHC, ESRD, Hospice, Home Office and OPO.
- SaFE Website, HCRIS Website, IRIS Database software and ProPapers
- Specialized Reporting for CA, NY, MA and VA

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alth Financial Systems HFS Systems and Features									
	Auditor	Management Reports	Data Extractor	EC/PI Import/Export	PS&R	AAI	API Excel	SaFE	Electronic Signing
2552-10	Χ	Х	Х	Х	Х	Х	Х	Х	Х
2540-10	Χ	Χ	Χ	Χ	Χ	Χ	Х	Χ	Χ
1728-20	Χ	Χ	Χ	Χ	Χ	Χ	Х	Χ	Х
222-17	Χ	Χ	Χ	Χ	Χ	Χ	Х	Χ	Χ
224-14	Χ	Χ	Х	Χ	Х	Χ	Х	Χ	Х
265-11	Χ	Χ	Χ	Χ	Χ	Χ	Х	Χ	Χ
1984-14	Χ	Χ	Х	Χ	Х	Χ	Х	Χ	Х
2088-17	Χ	Χ	Χ	Χ	Χ	Χ	Х	Χ	Χ
216-94	Χ	Χ	Х	Χ	Х	Χ	Х	Χ	Х
287-05	Χ	Χ	Χ	*		Х	Х	*	*



State Systems and Customizations

- CHDR CA Hospital Disclosure Report
- LTCIR Long Term Care Integrated Report
- VA DRG 796 and PIRS 1090
- NY NYICR

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HFS Cybersecurity

HITRUST Assessments run in two year cycles.

The first year is a full assessment and the second year is an interim assessment.

HFS recently completed a full assessment in December 2021.

We are about to begin our 2022 interim assessment.

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Health Financial Systems



Web Based Development

- SaFE
 - Processed and Stored about 30,000 submissions.
 - 18,157 or 70% were electronically signed
- HCRIS
 - 1,400,000 MCR reports
 - Upgrade in 2023
- HFS Plus Partnership Developing MCR Wokpaper Product

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Application Programming Interface

Computer Programs Talking to Each Other

- Read
- Write
- Auditor
- Printing
- ECR Import

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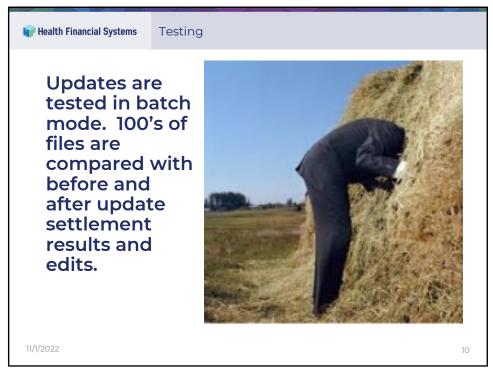
Batch Processing

- Batch Print
- Batch Import
- Batch Data Extractor
- Batch AAI

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MCRIF32 Development

- So far this year we have issued:
 - MCRIF32 Updates 7
 - MCRIF32 Patches 23
 - IRIS Updates 11 HCRIS Data – 4
 - WI PUF

W Health Financial Systems

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HFS Development

- MCRIF32 Print Upgrades
- Server Upgrades
- HCRIS Upgrade

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Training and Support

- Continued WebEx Training on HFS software features – 10 Sessions – Offered twice per year.
- Transmittal Updates
- Guest Speakers
- Individual Meetings/Training/Presentations
- Suggestions

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- While no current extension for the PHE after 12/31/2020 cost reports:
 - 42 CFR 413.24(f)(2)(ii)
 - (ii) Extensions of the due date for filing a cost report may be granted by the contractor only when a provider's operations are significantly adversely affected due to extraordinary circumstances over which the provider has no control, such as flood or fire.

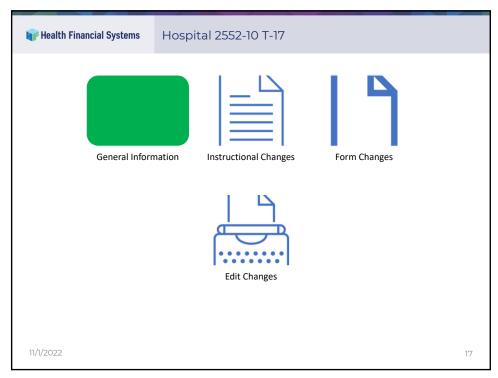
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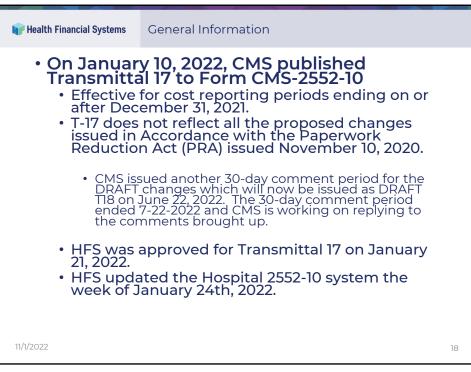
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Medicare Cost Report Filing Extension for Hospitals Reporting Allogeneic Hematopoietic Stem Cell Transplant Acquisition Costs for Cost Reimbursement

- The Medicare cost report due date has been extended for hospitals seeking cost reimbursement for allogeneic hematopoietic stem cell transplant (HSCT) acquisition costs for cost reporting periods beginning on or after October 1, 2020. Medicare Administrative Contractors (MACs) must approve a cost report submission extension for a hospital seeking cost reimbursement for allogeneic HSCT acquisition costs when the hospital PS&R data indicate that the hospital billed revenue code 815 and Medicare paid DRG 014.
- A hospital seeking cost reimbursement for allogeneic HSCT acquisition costs must submit their Medicare cost report to their MAC no later than 30 days after CMS approves the cost reporting software updated to report allogeneic HSCT acquisition costs and contractors must final settle the cost report using the latest available software updated to compute payment of allogeneic HSCT acquisition costs at reasonable cost.
- A hospital may submit their Medicare cost report prior to the availability
 of updated software to report allogeneic HSCT acquisition costs and
 subsequently submit an amended cost report using the updated
 software.





Instructional Changes

• Worksheet D-4 – MA Kidney reimbursement for Services on or after 1/1/2021:

Line 63--Enter the total Medicare usable organs that are included on line 62. Medicare usable organs include organs transplanted into Medicare beneficiaries (this excludes Medicare Advantage beneficiaries), organs sent to military hospitals (that have a reciprocal sharing agreement with the Organ Procurement Organization (OPO) in effect prior to March 3, 1988, and approved by the contractor), organs that had partial payments by a primary insurance payer in addition to Medicare, organs sent to other providers and organs sent to OPOs. Do not include organs used for research, organs sent to military hospitals (without a reciprocal sharing agreement with the OPO) in effect prior to March 3, 1988, and approved by the contractor), organs sent to veterans' hospitals, organs sent outside the United States, organs transplanted into non-Medicare beneficiaries, organs that were totally paid by primary insurance other than Medicare, organs that were paid by a Medicare Advantage plan, and organs procured from a non-certified OPO. Effective for services rendered on or after January 1, 2021, include kidneys transplanted into Medicare Advantage beneficiaries in the count of Medicare usable kidneys (this does not include non-renal organs, but is limited to kidney).

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Instructional Changes

 Worksheet E, Part A – Additional Payment for High Percentage of ESRD Beneficiary Discharges:

Line 40-Enter total Medicare discharges excluding discharges for MS-DRGs 652, 682, 683, 684, and 685 (see 73 FR 48447 and 48520 (August 19, 2008)). Effective for cost reporting periods beginning on or after October 1, 2011, enter total Medicare discharges (see 76 FR 51693 (August 18, 2011)) for all Medicare beneficiaries entitled to Medicare Part A. Individuals entitled to Medicare Part A. include individuals receiving benefits under original Medicare, individuals whose inpatient benefits are exhausted or whose stay was not covered by Medicare, and individuals enrolled in Medicare Advantage Plans, cost contracts under §1876 of the Act (HMOs), and competitive medical plans (CMPs). These discharges, excluding discharges for MS-DRGs 652, 682, 683, 684, and 685, must be included in the denominator of the calculation for the purpose of determining eligibility for the ESRD additional payment to hospitals. Effective for discharges occurring on or after October 1, 2020, exclude discharges for MS-DRGs 019, 650, 651, 682, 683, and 684 from the denominator (see 85 FR 5884) (September 18, 2020).

Line 41—Enter total Medicare discharges for ESRD beneficiaries who received dialysis treatment during an inpatient stay (see 69 FR 49087 (August 11, 2004)) excluding MS-DRGs 652, 682, 683, 684, and 685 (see 73 FR 48520 and 48447 (August 19, 2008)). Effective for cost reporting periods beginning on or after October 1, 2011, enter total Medicare discharges (see 76 FR 51693 (August 18, 2011)) for all ESRD Medicare beneficiaries entitled to Medicare Part A who receive inpatient dialysis. Individuals entitled to Medicare Part A include individuals receiving benefits under original Medicare, individuals whose inpatient benefits are exhausted or whose stay was not covered by Medicare, and individuals enrolled in Medicare Advantage Plans, cost contracts under 81876 of the Act (HMOS), and CMPs. These discharges, excluding discharges for MS-DRGs 652, 682, 683, 684, and 685, must be included in the numerator of the calculation for the purpose of determining eligibility for the ESRD additional payment to hospitals. Effective for discharges occurring on or after October 1, 2020, exclude discharges for MS-DRGs 019, 650, 651, 682, 683, and 684, from the numerator (see 85 FR 58844 (September 18, 2020)).



Instructional Changes

 Worksheet E, Part A – Additional Payment for High Percentage of ESRD Beneficiary Discharges. Average weekly cost still has not been updated since 2013.

<u>Line 45</u>-Enter the average weekly cost per dialysis treatment calculated by multiplying the unadjusted composite rate per treatment by 3. For example, the average weekly cost per dialysis treatment for CY 2013 is \$435.60 (\$145.20 times the average weekly number of treatments of 3). This amount is subject to change on an annual basis. Consult the appropriate CMS change request for future rates.

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HFS Note: Old w/s E part A, line 5.05.
HFS Note: $401.43 for 2009; $405.45 for 2010; $417.06 for 2011; $425.82 for 2012, $435.60 for 2013.
HFS Note: HFS has been informed that there is NO increase for 2014 and subsequent years relating to the ESRD Average weekly cost per dialysis treatment.
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Instructional Changes

 Worksheet E-4 – Not in T-17 but the CY 2018 MC+ DGME reduction was revised from 7% to 4.12% for CY 2018:

Line 29.01—If the response to Worksheet S-2, Part I, line 56, column 2, is "Y", enter in columns 2 and 2.01, the applicable reduction percentage to MA direct GME payments. Enter in column 2, the MA reduction percentage for the portion of the cost reporting period prior to January 1; and enter in column 2.01, the MA reduction percentage for the portion of the cost reporting period on or after January 1. Calendar year providers complete only column 2.

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CY 2010 2011 2012 2013 2014 2015 2016 2017 2018 * 2019 *
Percent reduction 9.77 7.85 7.16 6.41 5.86 5.32 4.99 4.44 4.12 4.07 to MA DISME
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HFS Note: CY 2018 revised per CR12596 issued 2/4/2022 and CY 2019 updated via CR 12407 issued 10/21/2021.

- Per FFY 2023 FR (Slide 51)
 - CY 2020 3.71%
 - CY 2021 3.22%



Instructional Changes

 Worksheet M-3 – Incorporated changes to account for CMS' update for RHC cost limits initiated in CR12185, dated May 4, 2021 which now requires a split at 4-1-21:

Line 8--Enter the per visit payment limit. Obtain this amount from your contractor

NOTE: For services rendered prior to April 1, 2021, if you are based in a small hospital with less than 50 beds (the bed count is based on the same calculation used on Worksheet E, Part A, line 4), in accordance with 42 CFR 412.105(b), do not apply the per visit payment limit. Transfer the adjusted cost per visit (line 7) to line 9, columns 1 and/or 2.

NOTE: In accordance with §1833(f)(3) of the Act, as amended by §130 of the Consolidated Appropriations Act of 2021, effective for services on or after April 1, 2021, hospital-based RHCs with less than 50 beds (as calculated above) will have their per visit payment limit calculated in accordance with §1833(f)(3)(B) of the Act by their contractor. See CR 12185, dated May 4, 2021, or subsequent applicable CRs.

For hospital-based RHCs based in small urban hospitals transfer the adjusted cost per visit (line 7) to line 9, column 1 and/or 2.

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Instructional Changes

 Worksheet M-3 – Incorporated changes to account for CMS' update for RHC cost limits initiated in CR12185, dated May 4, 2021 which now requires a split at 4-1-21. See MM12185 explaining Hospital based RHCs:

Beginning April 1, 2021, under Section 1833(f)(3)(A) of the Act, PB RHCs that meet the definition in <u>Section 1881(f)(3)(B)</u>, will have a payment limit per visit established at an arequal to the **greater** of:

- The payment per visit amount applicable to the PB RHC for services furnished in 2020 (interim amount if MACs don't have a final cost settled amount), increased by the percentage increase in CV 2021 MEI of 1.4%, or
 The payment limit per visit applicable to RHCs (listed above)

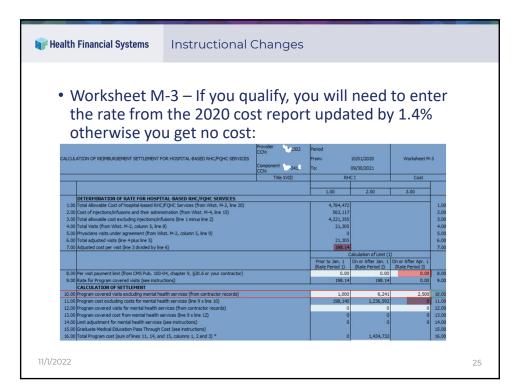
Then, in a subsequent year (that's, after 2021), the PB RHC's payment limit per visit will be the ${\it greater}$ of:

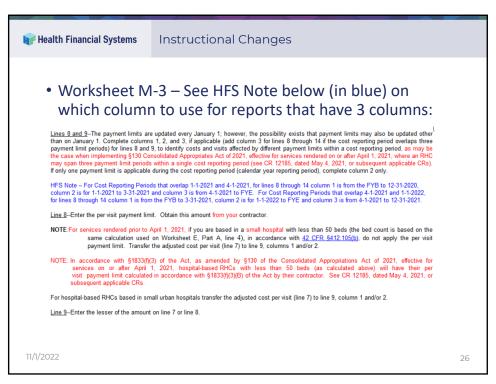
- The payment per visit amount applicable to each PB RHC for services furnished in the previous year, increased by the percentage increase in MEI applicable to primary care services furnished as of the first day of that year, or
 The payment limit per visit applicable to each year for RHCs (listed above)

PB RHCs that meet the definition in Section 1881(f)(3)(B) are grandfathered into the establishment of their payment limit per visit. That is, a PB RHC must have been in a hospital with fewer than 50 beds and enrolled in Medicare as of December 31, 2019, to receive their payment per visit based on their average allowable costs. For purposes of determining RHCs that meet the definition of Section 1881(f)(3)(B), CMS will take into account the policy we finalized in the Internit final rule with comment, published in the May 8, 2020, Federal Register

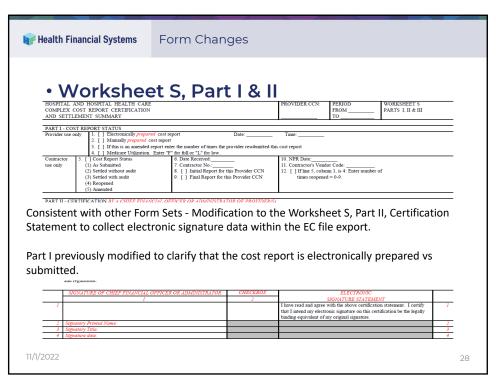
We plan to discuss certain policies and processes used in establishing PB RHCs' per visit payment amount in the CY 2022 Physician Fee Schedule rules.

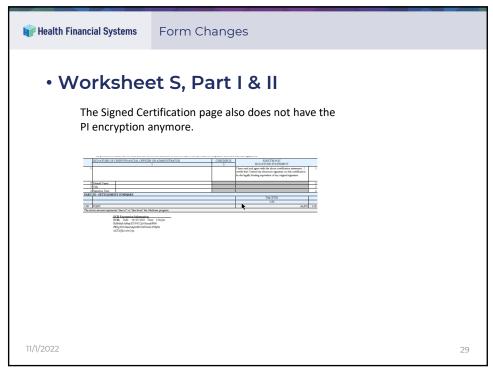
We will continue to provide the MEI update and applicable rate updates in the Recurring Ann RHC CR.

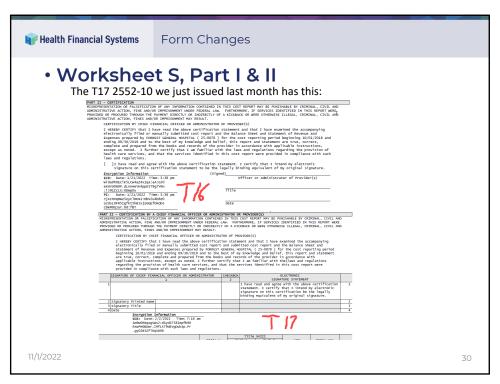




Flealth Financial Systems	Form Chan	ges				
Workshee Hospital and Hospital Health care Complex cost report certification AND settlement summary.	et S, Par	t I & II	PROVIDER CCN:	PERIOD FROMTO	WORKSHEET S PARTS I, II & III	
AND SETTEEMENT SCHMAKT				10	-	
PART I - COST REPORT STATUS						
Provider use only 1. [] Electronically prepare		Date:	Time:			
2. [] Manually prepared co						
	eport enter the number of times the	provider resubmitted this	cost report			
	Enter "F" for full or "L" for low. 6. Date Received:		10. NPR Date:			
Contractor 5. [] Cost Report Status use only (1) As Submitted	Date Received: Contractor No.:	_	10. NPR Date: 11. Contractor's Vende	or Code:		
(2) Settled without audit	8. [] Initial Report for	this Provider CCN		or Code: on 1. is 4: Enter number o	of.	
(3) Settled with audit	9. [] Final Report for the		times reopened		-	
(4) Reopened						
(5) Amended						
PART II - CERTIFICATION BY A CHEEP PINAN MISREPRESENTATION OR FALSIFICATION OR ACTION, FINE AND OR IMPRISONMENT UNI THE PAYMENT DIRECTLY OR INDIRECTLY. IMPRISONMENT MAY RESULT. CERTIFICATION BY CHIEF FINANCL I HEREBY CERTIFY that I have read the submitted cost report and the Balance She cost reporting period beginning complete and prepared from the books and laws and regulations regulations regarding and regulations.	F ANY INFORMATION CONTAL BER FEDERAL LAW FURTHERS OF A KICKBACK OR WERE OTH AL OFFICER OR ADMINISTRATE above certification statement and the and ending are cords of the provider in accordan the provision of health care services	NED IN THIS COST R MORE, IF SERVICES I EERWISE ILLEGAL, CI OR OF PROVIDER(S) and to the best of my k ce with applicable instru , and that the services id	DENTIFIED IN THIS R RIMINAL, CIVIL AND ccompanying electronica nowledge and belief, this tions, except as noted. I	EPORT WERE PROVII ADMINISTRATIVE AC lly filed or manually subn _(Provider Name(s) and report and statement are further certify that I am it t were provided in comple	DED OR PROCURED THI TION, FINES AND/OR nitted cost report and Number(s)} for the true, correct, familiar with the	
SIGNATURE OF CHIEF FINANCIAL O	OFFICER OR ADMINISTRATOR	CHECKBOX		ELECTRONIC		
1		2		SIGNATURE STATEME		
I				with the above certification		1
		1	that I intend my electro binding equivalent of n	onic signature on this cert	incation oe the legally	
2 Signatory Printed Name:			omong equivalent of i	ну отграни окраните.		2
3 Signatory Title:						3
4 Signature date:						4
•						
11/1/2022						27









Form Changes

Worksheet S-2, Part I

22.03 Did this hoopital receive a geographic reclassification from urban to rural as a result of the OMB standards for delineating statistical areas adopted by CMS in FY2015? Enter in column 1, "Y" for yes or "N" for no for the portion of the cost reporting period occurring on or after October 1. (see instructions)

Does this hospital contain at least 100 but not more than 490 beds (as counted in accordance with 42 CFR 442.105)? Enter in column 3, "Y" for yes or "N" for no for the portion of the cost reporting period occurring on or after October 1. (see instructions)

22.04 End this technique agreements reported from urban to more data of the report OLD additional resort as careful and of the report OLD additional resort as careful and the resort of the additional resort as a resolution of the resort of the additional resort as a resolution of the resort of

OH Did this hospital receive a geographic reclassification from urban to rare as a result of the revised OME diministrations for statistical meast adopted by CMS in FT 2011? Enter in column 1, "I" for yets or "N" no for the portion of the cost reporting period prior to October 1. Enter in column 2, "I" for yets or "N" for no for the portion of the cost reporting period prior to October 1. (see instructions)

The addition of Worksheet S-2, Part I, line 22.04 for "For cost reporting periods ending on or after October 1, 2020, and before October 1, 2022, The FY 2021 IPPS final rule (CMS-1735-F; 85 FR 58746, September 18, 2020) provided for a 2 year transition (in accordance with 42 CFR 412.102) to a rural DSH payment amount from an urban DSH payment amount, for hospitals that received a geographic reclassification from urban to rural under the OMB standards for delineating statistical areas adopted by CMS in FY 2021. Impacted hospitals whose DSH payment adjustment exceeded 12 percent will receive 2/3 of the difference between the urban and rural operating DSH for FY 2021 and 1/3 of the difference between the urban and rural operating DSH for FY 2022. "

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Form Changes

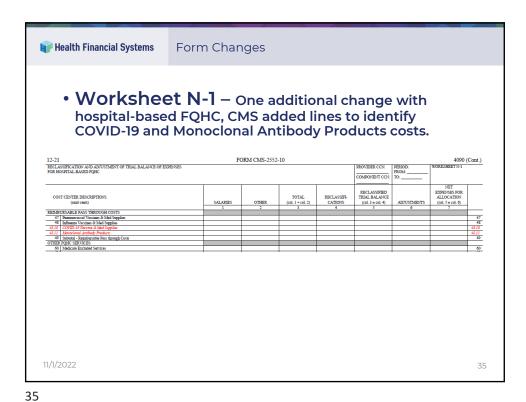
 Multiple Forms - Removed references to the term "Nursing School" and replacing them with "Nursing Program".

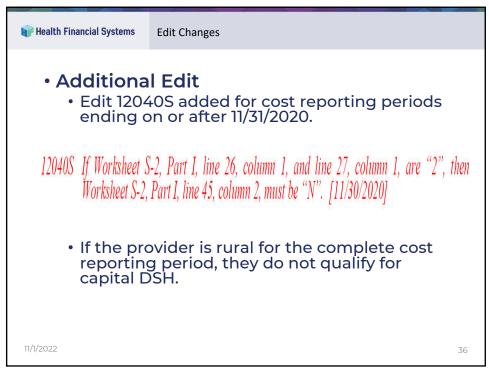
COST	CENTER DESCRIPTIONS	OTHER GENERAL SERVICE	NON- PHYSICIAN ANES- THETISTS	NURSING PROGRAM 20
	GENERAL SERVICE COST CENTERS	10	12	20
1	Capital Related Costs-Buildings and Fixtures			
2	Capital Related Costs-Movable Equipment			
4	Employee Benefits Department			
5	Administrative and General			
6	Maintenance and Repairs			
7	Operation of Plant			
8	Laundry and Linen Service			
9	Housekeeping			
10	Dietary			
11	Cafeteria			
12	Maintenance of Personnel			
13	Nursing Administration			
14	Central Services and Supply			
15	Pharmacy			
16	Medical Records & Medical Records Library			
17	Social Service			
18	Other General Service (specify)			
19	Nonphysician Anesthetists			
20	Nursing Program			

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₩ He	alth Financial Systems	Form Char	nges				
	• Workshee standing RHC Antibody Prod	for Covid-					
COMPUTATIO	ON OF HOSPITAL-BASED <i>RHC/FQHC</i> 1	VACCINE COST		PROVIDER CCN: COMPONENT CCN:	PERIOD: FROM TO	WORKSHEET M-4	
Check applicable boxes:	[] Hospital-based RHC [] Hospital-based FQHC	[] Title V [] Title XVIII [] Title XI					
			PNEUMOCOCCAL VACCINES 1	INFLUENZA VACCINES 2	COVID-19 VACCINES 2.01	MONOCLONAL ANTIBODY PRODUCTS 2.02	
1 Healti	h care staff cost (from Worksheet M-1, colu	ımn 7, line 10)	1	2	2.01	2.02	1
	of injection/infusion staff time to total						2
	i care staff time ion/infusion health care staff cost (line 1 x	line 2)					3
	ions/infusions and related m edical supplies your records)	costs					4
11/1/20	022					3	33

H	Health Financial Systems Form Char	nges				
	• Worksheet N-3 – based FQHC.	Similar cl	hanges f	or hospi	tal-	
COMPU	JTATION OF HOSPITAL-BASED FQHC VACCINE COST		PROVIDER CCN: COMPONENT CCN:	PERIOD: FROM:	WORKSHEET N-3	
			COMPONENT CCN.	10		
		PNEUMOCOCCAL VACCINES	INFLUENZA VACCINES	COVID-19 VACCINES	MONOCLONAL ANTIBODY PRODUCTS	
1	Health care staff cost (from Worksheet N-1, column 7, sum of	1	2	2.01	2.02	1
2	lines 23, and 25 through 36) Ratio of injection/infusion staff time to total health care staff time					2
3	Injection/infusion health care staff cost (line 1 x line 2) Injections/infusions and related medical supplies cost (from Worksheet N-1,					3
	column 7, lines 47, 48, 48.10, and 48.11, respectively)		<u> </u>			
1	1/1/2022					34







Edit Changes

Additional Edits

 The following edits were Level Two edit but will be upgraded to Level One edits for non-governmental providers for cost reporting periods ending on or after 10/31/2020.

The 10000G series of edits apply to all provider types, except governmental providers. Consequently, do not apply these edits to providers where the response to Worksheet S-2, Part I, line 16, is "7" through "13". This exception applies to the following edits: 10000G, 10050G, 10100G, and 10150G:

- 10000G Total assets on Worksheet G (sum of each of columns 1 through 4, lines 1 through 10, 12 through 29 (subscripts as indicated), and 31 through 34, must equal total liabilities and finid balance (sum of each of columns 1 through 4, lines 37 through 44, 46 through 49, and 52 through 58). This edit was previously 20000G. [10/31/2020]
- 10050G Total patient revenue (Worksheet G-2, Part I, column 3, line 28) must equal the sum of inpatient and outpatient revenue (Worksheet G-2, Part I, sum of columns 1 and 2, line 28). This edit was previously 20050G. [10/31/2020]
- 10100G Net income or loss (Worksheet G-3, column 1, line 29) must not equal zero. This edit was previously 20100G. [10/31/2020]
- 10150G Contractual allowances (Worksheet G-3, column 1, line 2) must not be negative. This edit was previously 20150G. [10/31/2020]
 - · These may impact previously submitted cost reports.

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Edit Changes

Additional Edits

- The following edits were added for cost reporting periods beginning on or after 1/1/2022.
- 10300M Worksheet M-4, line 13.01, columns 2.01 and 2.02, must be zero, for cost reporting periods beginning on or after January 1, 2022. [01/01/2022b]
- 10350N Worksheet N-3, line 13.01, columns 2.01 and 2.02, must be zero, for cost reporting periods beginning on or after January 1, 2022. [01/01/2022b]
 - These edits will eliminate Covid-19 Vaccine and Monoclonal Antibody (cost report) reimbursement for MA enrollees after 12/31/2021.

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T-17 Clarifications

- We received a number of clarifications subsequent to the issuance of T-17:
 - Sequestration
 - 0% period 5/1/2020 3/31/2022
 - 1% period 4/1/2022 6/30/2022
 - 2% after 7/1/2022
 - DGME MA reduction of 4.12% for CY 2018

CY	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Percent reduction to MA DGME	9.77	7.85	7.16	6.41	5.86	5.32	4.99	4.44	7.00 4.12	4.07

- Multiple RHC/FQHCs
 - Up to 50RHC
 - Up to 36 FQHCs

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T-17 Clarifications

New Edits

121108 If Worksheet S-2, Part I, line 39, either column 1 or 2, is "N" for no, then Worksheet E, Part A, lines 70.96, 70.97, and 70.98, must be zero; and vice versa. [07/01/2022]

12115S If Worksheet S-2, Part I, line 40, columns 1 and 2, are "N" for no, then Worksheet E, Part A, line 70.99, must be zero and vice versa, and if Worksheet S-2, Part I, line 40, columns 1 or 2, are "Y" for yes, then Worksheet E, Part A, line 70.99, must be greater than zero and vice versa. [07/01/2022]

10201D Worksheet D-1, Part I, column 1, sum of lines 7 and 8, must equal Worksheet S-3, Part I, column 8, line 6. [02/28/2022]

Revised Edits

The 10000G series of edits apply to all provider types, except governmental providers. Consequently, do not apply these edits to providers where the response to Worksheet S-2, Part I, line 216, is "7" through "13". This exception applies to the following edits: 10000G, 10050G, 10100G, and 10150G:

20325S If Worksheet S-2, Part I, line 26, column 1, is "1" (urban status), and line 27, column 1, is "2" (rural status), then Worksheet L, Part I, line 1, column 1.01, must be greater than zero. Do not apply this edit to a CAH (Worksheet S-2, Part I, line 105 is "Y"). [04/30/2021]

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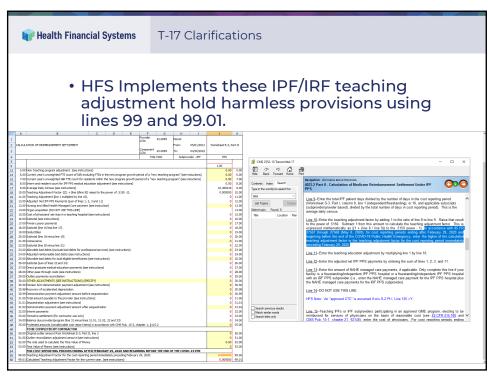
F Health Financial Systems

T-17 Clarifications

- In accordance with 85 FR 27567 through 27568 (May 8, 2020), for cost reporting periods ending after February 29, 2020 and beginning before the end of the COVID-19 Public Health Emergency, enter the higher of the calculated teaching adjustment factor or the teaching adjustment factor for the cost reporting period immediately preceding February 29, 2020.
- HFS Implements these IPF/IRF teaching adjustment hold harmless provisions using lines 99 and 99.01.

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T-17 Clarifications

- Line 10 IPF Line 10 flows from the Higher of lines 99 or 99.01
 - IRF calculated (line 99.01) and compared to Teaching Adjustment Factor from the report immediately preceding February 29, 2020 (input on line 99)
- Line 11 IRF Line 11 flows from the Higher of lines 99 or 99.01
 - IRF calculated (line 99.01) and compared to Teaching Adjustment Factor from the report immediately preceding February 29, 2020 (input on line 99)

11/1/2022

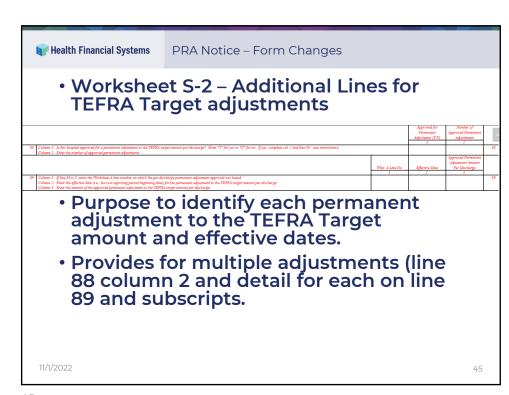
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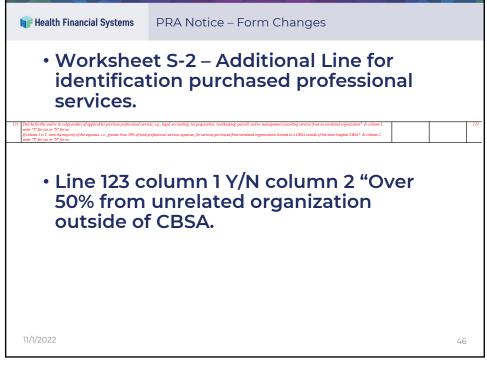
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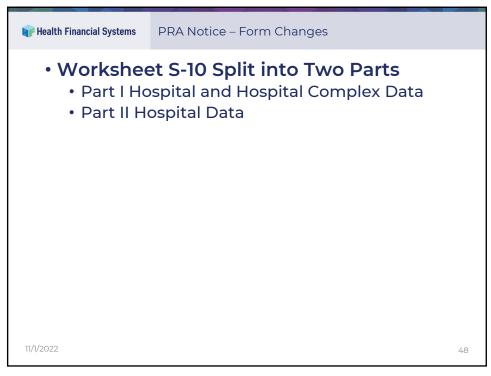
PRA Notice

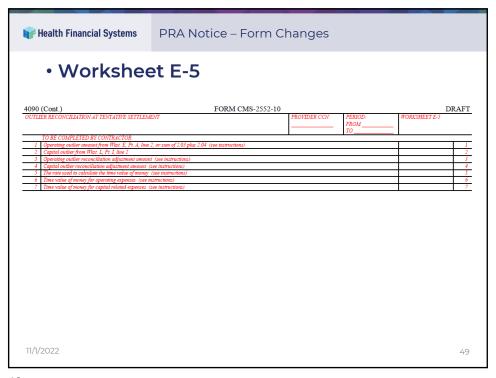
- New 30-day comment period notice published 6/22/2022
 - Form Changes
 - Instructional Changes

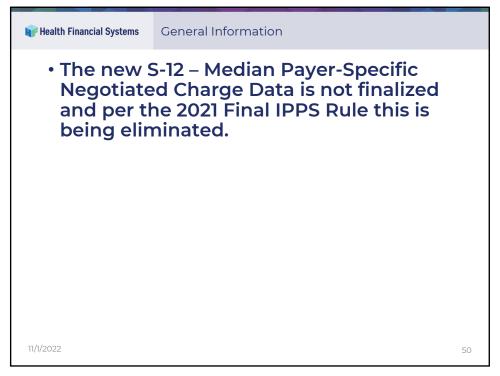




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	Line	No. of	Bed Days	CAH		Title	Title	All	Interns &	On	Nonpaid		Title	Title	All	
Component	Number	Beds	Available	Hours 4	Title V	XVIII 6	XIX 7	Patients	Residents	Payroll 10	Workers 11	Title V 12	XVIII 13	XIX 14	Patients 15	
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2 HMO and other (see instructions)																2
3 HMO IPF Subprovider 4 HMO IRF Subprovider																3
5 Hospital Adults & Peds. Swing Bed SNF			 				_									- 4
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7 Total Adults and Peds. (exclude observation beds) (see instructions)																7
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outpatient days (see instructions)																
33 LTCH non-covered days 33.01 LTCH site neutral days and discharges																33.01
34 Temporary Expansion COVID-19 PHE Acute Care																334
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PRA Notice - Form Changes

Worksheet A

- · Additional lines:
- Line 77 Allogeneic HSCT Acquisition (07700)
 - Reimbursed as pass-through (Worksheet D-6)
- Line 78 CAR T Cell Immunotherapy (07800)
 - Reimbursed as IP/OP Services
- Line 102 Opioid Treatment Program (10200)

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PRA Notice – Instructional Changes

Worksheet A

Line 77--Effective for services rendered on or after January 1, 2017, enter the hospital acquisition costs for allogeneic (stem cells obtained from a donor other than the recipient) hematopoietic stem cell transplants (HSCT) as defined in CMS Pub. 100-04, chapter 3, \$90.3.1, and CMS Pub. 100-04, chapter 4, \$231.11. This includes costs of services purchased under arrangements and registry fees for national donor registries (42 USC 274k), if applicable. Do not reclassify costs from the routine and ancillary cost centers; rather compute the acquisition costs on Worksheet D-6, Part I, including acquisition costs associated with services intended for transplant but not resulting in transplant, i.e., due to death of the intended recipient or other causes. Do not include costs for allogeneic HSCT on this line. Do not include any costs related to autologous (stem cells obtained from the recipient) hematopoietic stem cell acquisition or transplants on this line (CMS Pub. 100-04, chapter 3, \$90.3.2, and 100-04, chapter 4, \$231.10).

Line 78--Effective for cost reporting periods beginning on or after October 1, 2022, enter the hospital costs for procuring, storing, and processing chimeric antigen receptor T-cells (CAR T-cell) for immunotherapy infusion (FDA-approved CAR T-cell immunotherapies only). This includes the cost of the CAR T-cell manufactured biologic, i.e., the cost paid to the manufacturer. Do not include costs for CAR T-cell immunotherapy transplants or the medication cost of the non-CAR T-cell drugs used for CAR T-cell immunotherapy complications, e.g., cytokine release syndrome, on this line.

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PRA Notice – Instructional Changes

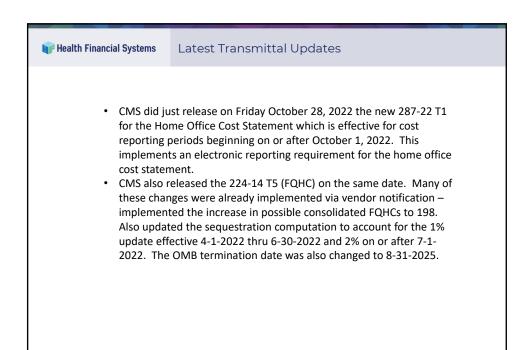
Worksheet A

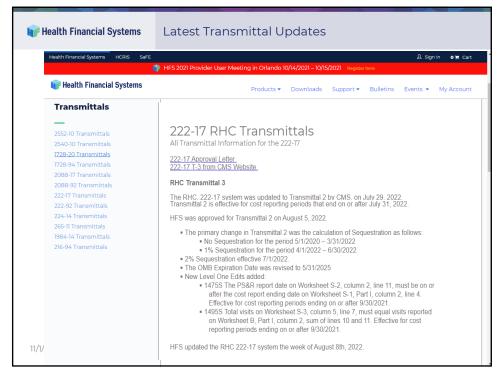
<u>Line 102</u>--Effective for cost reporting periods ending on or after January 1, 2022, enter the cost of providing services for the treatment of Opioid Use Disorder furnished by the hospital's Medicare-enrolled opioid treatment program as defined in the Act §1861(jjj) and as described in CMS Pub. 100-02, Medicare Benefit Policy Manual, chapter 17.

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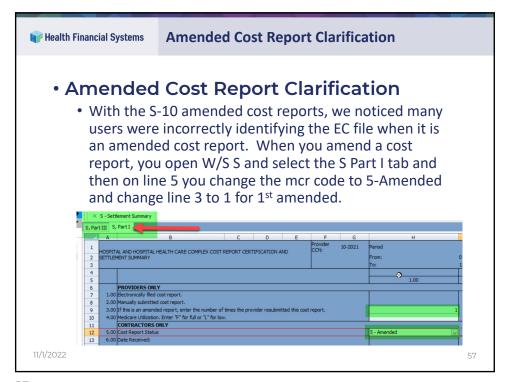
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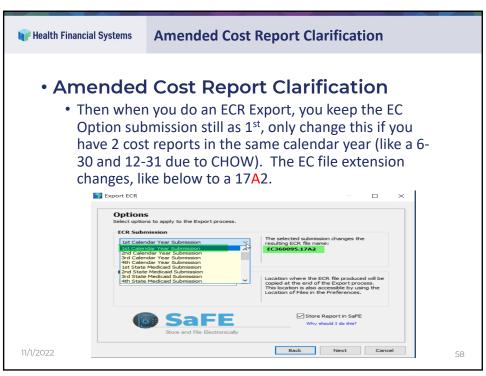
Health Fina	ncial Systems	Latest Trai	nsmittal U	pdates		
Form	Туре	Latest Transmittal	CMS Issued	HFS Approved	HFS Released	Effective Date
2552-10	Hospital	17	1/10/2022	1/21/2022	1/24/2022	Ending O/A 12/31/2021
2540-10	SNF	10	6/11/2021	6/25/2021	6/30/2021	Ending O/A 3/31/2021
216-94	ОРО	10	8/26/2022	9/9/2022	9/15/2022	Ending O/A 8/31/2022
1728-20	ННА	3	8/31/2022	9/12/2022	9/15/2022	Ending O/A 8/31/2022
265-11	ESRD	6	4/30/2021	6/9/2021	6/25/2021	Ending O/A 3/31/2021
224-14	FQHC	4	4/30/2021	6/9/2021	6/25/2021	Ending O/A 3/31/2021
1984-14	Hospice	4	4/30/2021	6/9/2021	6/18/2021	Ending O/A 12/31/2020
222-17	RHC	3	7/29/2022	8/5/2022	8/8/2022	Ending on or after 7/31/2022
2088-17	СМНС	3	8/26/2022	9/9/2022	9/15/2022	Ending O/A 8/31/2022
		No Recen	t Changes			
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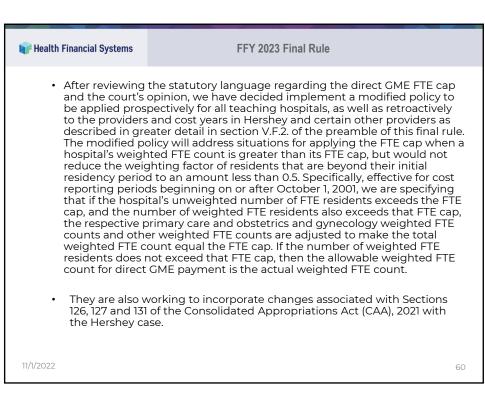






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FFY 2023 Final Rule

• CMS did instruct MACs to reopen cost reports for the plaintiffs in the Hershey case and furnished us the computation that is to be used for the Worksheet E-4 changes. We released this change in late October by utilizing a non-CMS W/S E-4 lines 109 and 122 (as these will override the current calculations for lines 9 and 22 when the report is affected by the lawsuit). Line 109 column 0 will be changed to YES and this will trigger the new computation, below is what is listed in the Help | 2552-10 CMS Instructions for W/S E-4:

HFS Note: HFS has added Contractor Only lines 109 and 112 to implement the Federal Fiscal Year Final Rule Worksheet E-4, line 9 and 22 revised calculations for cost reporting periods beginning prior to 10/01/2021 in accordance with the Hershey Case.

Line 109 - Enter in column 0, "Y" or "N" to calculate line 9 in accordance the Federal Fiscal Year 2023 Final Rule for cost reporting periods beginning prior to 10/1/2021. If "Y", transfer the amounts in line 109 column 1 and 2 to line 9 columns 1 and 2. For columns 1 and 2, If line 8, column 3, is less than or equal to line 5, enter the amounts from line 8, columns 1 and 2, in line 109 columns 1 and 2. Otherwise, if the total weighted FTE count from line 8, column 3 is greater than the amount on line 5, then enter in line 109 column 1 the result of ((primary care & OBGYN weighted FTEs/total weighted FTEs) x FTE cap)). The formula for this is (E-4 line 8 col 1 / line 8 col 3) * E-4 line 5. Enter in line 109 column 2 the result of ((other weighted FTEs/ total weighted FTEs) x FTE cap)). The formula for this is (E-4 line 8 col 2 / line 8 col 3) * E-4 line 5.

<u>Line 122</u> - Line 122 on E-4 will override line 22 when line 109 column 0 is Y. If (E-4 line 8 col 3 – E-4 line 9 col 3) > E-4 line 20 then enter line 20 on line 122, else, (E-4 line 8 col 3 – E-4 line 9 col 3).

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FFY 2023 Final Rule

Please note it states Contractor Only, this is due to CMS not publishing the
final changes (in what we expect to be TI8). Providers are able to change
line 109 column 0 to YES and it will compute the new values, however,
there will be a HFS level I edit so you will not be able to file with this. You
always can include an Other Adj amount and then amend the cost report
when the transmittal is release. Below is the change to the W/S E-4
screen:

E-4 Calculation - In accordance with the FY 2023 IPPS Final Rule.					
	Y/N	Primary Care	Other	Total	
109.00 Enter in column 0, "Y" or "N" to calculate line 9 in accordance the Federal Fiscal Year 2023 Final Rule for cost reporting periods beginning prior to 10/1/2021. (see instructions)	NO ·	0.00	0.00	0.00	109.00
122.00 Override of line 22 for cost reporting periods beginning prior to 10/1/2021. (see instructions)		0.00			122.00
If line 109 column 0 is Y, you MUST open up the PY and Penultimate cost reports and answer line columns 1 & 2 to the CY lines 12 & 13 columns 1 & 2 respectively.	109 colun	nn 0 "Y" and calcu	late, then input a	mounts from line	11

commis 1 & 2 to die et mies 12 & 15 commis 1 & 2 respectively.

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FFY 2023 Final Rule

- Percentage Reduction to MA for DGME Payments now to be published in Rulemaking. CY 2020 and 2021.
- CMS has notified us on Friday October 28, 2022 to implement these changes, see next slide.

	CY 2020	SOURCE	CY 2021	SOURCE
	\$ 264,332,386	Cost reports ending in FY 2018 HCRIS	\$ 276,790,522	Cost reports ending in FY 2019
NAH Pass-Through				HCRIS
	64,285,989	Cost reports ending in FY 2018 HCRIS	66,512,964	Cost reports ending in FY 2019
Part A Inpatient Days				HCRIS
	9,473,935	Cost reports ending in FY 2018 HCRIS	10,702,732	Cost reports ending in FY 2019
MA Inpatient Days				HCRIS
Part A Direct GME	\$ 2,772,451,903	CY 2019 HCRIS + CPI-U	\$ 2,732,276,287	CY 2019 HCRIS + CPI-U
MA Direct GME	\$1,608,018,609	CY 2019 HCRIS + CPI-U	\$ 1,840,934,928	CY 2019 HCRIS + CPI-U
		((Part A DGME/MA DGME) * (NAH		((Part A DGME/MA DGME) *
Pool (not to exceed \$60 million)	\$ 60,000,000	Pass-through))	\$ 60,000,000	(NAH Pass-through))
Percent Reduction to MA DGME		(Pool/MA direct GME)		
Payments	3.71%		3.22%	(Pool/MA direct GME)

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FFY 2023 Final Rule

 The Worksheet E-4, line 29.01 HMO GME reduction for Calendar Years 2020 and 2021 is released. This will not automatically update to your mcrx file, you must go into the form and make this change. We will issue an edit telling you the rate is not equal to the CMS' rate when different. This update is to be released the first week of November.

4034. WORKSHEET E-4 - DIRECT GRADUATE MEDICAL EDUCATION (GME) AND ESRD OUTPATIENT DIRECT MEDICAL EDUCATION COSTS [page 40-216.2]

Line 29.01—If the response to Worksheet S-2, Part I, line 56, column 2, is "Y", enter in columns 2 and 2.01, the applicable reduction percentage to MA direct GME payments. Enter in column 2, the MA reduction percentage for the portion of the cost reporting period prior to January 1; and enter in column 2.01, the MA reduction percentage for the portion of the cost reporting period on or after January 1. Calendar year providers complete only column 2.

CY	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Percent reduction to MA DGME	9.77	7.85	7.16	6.41	5.86	5.32	4.99	4.44	7.00 4.12	4.07	3.71	3.22

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FFY 2023 Final Rule

 CMS also instructed us to update the Cancer Hospital PCR amount for CY 2022 on E Part B line 5:

4030.2 <u>Worksheet E, Part B - Medical and Other Health Services</u>—Use Worksheet E, Part B, to calculate reimbursement settlement for hospitals, sub-providers, SNFs and providers participating in the PARFIM demonstration. [page 40-178]

Line 5—Enter the hospital specific payment to cost ratio provided by your contractor. If a new provider does not file a full cost report for a cost reporting period that ends prior to January 1, 2001, the provider is not eligible for transitional corridor payments and should enter zero (0) on this line. (See PM A-01-51)

For a cancer hospital, enter the target PCR as published in the applicable OPPS final rule (or correction, notice), and subscript column 1 for each PCR period when the cost reporting period overlaps a PCR revision date. Following is a table of the PCRs beginning with CY 2012.

 CY
 2012
 2013
 2014
 2015
 2016
 2017
 2018
 2019
 2020
 2021
 2022

 PCR
 0.91
 0.91
 0.90
 0.90
 0.92
 0.91
 0.88
 0.88
 0.89
 0.89
 0.89

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FFY 2023 Final Rule

- · Low Volume Payment Adjustment
 - Effective 10/1/2022 reverts to previous Methodology
 - Located more then 25 road miles from another subsection (d) hospital.
 - Less than 200 Discharges.
 - Hospital must submit a written request for LV Status
 - No Later than 9/1/2022 or effective 30-days after MAC determination.
 - 25% add-on payment adjustment.
 - Implement on Cost Report or Claim payment?
- MDH Hospitals
 - MDH Provision expires 10/1/2022.
 - Current MDH may apply for SCH status.
 - Request Prior to 9/1/2022 for effective date of 10/1/2022
- Biden extended these programs thru December 16, 2022 by the Continuing Appropriations and Ukraine Supplemental Appropriations Act, 2023. This was detailed in CR12970.
 - Low Volume MACs must receive provider's written request or verification no later than 11-16-22.
 - MDH- will be extended unless provider requested cancellation of their rural classification under §412.103(b).

11/1/2022



Requests for .Auditor files

Auditor creates adjusted cost report.

- Created when adjustments applied
- Same filename as cost report.
- Filename ends with ".mcax".

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Requests for .Auditor files

Example of properly named cost report and .Auditor files

HFS Test Case 2018.mcrx HFS Test Case 2018.Auditor

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Requests for .Auditor files

- 1. Enter the Wage Index adjustments.
- 2. Apply and see the changed amounts.
- 3. Submit the .Auditor file to your MAC.
- 4. Why?
 - 1. Isolates changes if S-10 or other review started
 - 2. MAC can import adjustments and include with their adjustments.

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CMS' IRIS Changes

- CMS has been having meetings since April 2015 with all the IRIS vendors to assist them in creating their own IRIS system.
- CMS has tied the IRIS into the PS&R and STAR system to incorporate a National Database.
- MACs are now uploading the IRIS files submitted with the Medicare Cost Reports.
- CMS issued CR9984 on March 17, 2017 instructing MACs to load a minimum of 4 years of historical IRIS dbf files to the new STAR IRIS.



- This will enable the IRIS database to accumulate historical info for each resident to determine the initial residency and number of years the residents have completed.
- The other major issue is running overlaps, therefore, it is vital to have discussions between the hospitals if residents rotate to other hospitals.

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CMS' IRIS Changes

- CMS is pushing to compare the cost report FTEs to what they calculate the FTEs from the submitted IRIS files. They are planning to begin holding up the acceptance of cost reports in the near future where they do not trace (the FFY 22 IPPS <u>Proposed Rule</u> wanted to begin with cost reporting periods beginning on or after 10-1-2021).
- The FFY 22 IPPS Final Rule removed the requirement to trace the IRIS FTEs to the cost report, however, they did state the implementation of XML rather than DBF will begin with cost reporting periods beginning on or after 10-1-2021.

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- The Final Rule is 86 FR 45311 through 45313 dated August 13, 2021.
- https://www.govinfo.gov/content/pkg/FR-2021-08-13/pdf/2021-16519.pdf

CMS is validating vendor IRIS software to ensure that it meets the IRIS XML specifications and will release the list of all approved IRIS software vendors. However, we agree with the commenters that we should delay the implementation of the new policy requiring MACs to reject cost reports where the total number of reported submitted IRIS GME and IME FTEs do not match the total IME and GME FTEs reported on the cost report.

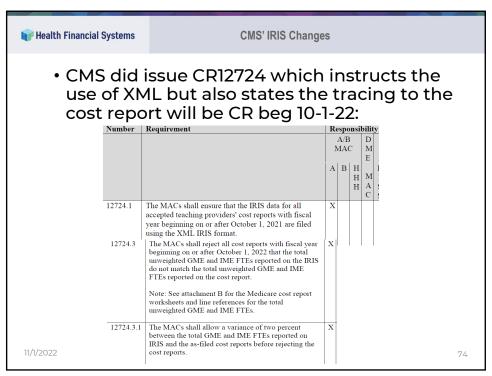
After consideration of the public comments we received, we are

modifying 42 CFR 413.24(f)(5)(i)(A) to require that for cost reporting periods beginning on or after October 1, 2021, the GME weighted and unweighted) and IME FTE counts on the submitted IRIS must match the total GME and IME FTE counts reported on the cost report. However, for cost reporting periods beginning on or after October 1, 2021 and before October 1, 2022, the cost reports will not be rejected if the total IME and GME FTEs (weighted and unweighted) on the submitted IRIS do not match the total related FTEs reported on the cost report.

We are also revising this sub-section to include a requirement that for cost reporting periods beginning on or after October 1, 2021, the IRIS data must be in the XML format.

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 Below is Attachment B and the fields to be compared at acceptance.

Attachment B

Total Unweighted GME FTEs-IPPS Teaching Providers

- Worksheet E-4 Line 6: Unweighted resident FTE count for allopathic and osteopathic programs for
- Worksheet E-4 Line 10.01, Column 2: Unweighted dental and podiatric resident FTE count for the
- Worksheet E-4 Line 15.01 Columns 1 & 2: Unweighted adjustment for residents in initial years of
- Worksheet E-4 Line 16.01 Columns 1 & 2: Unweighted adjustment for residents displayed by

Total Unweighted IME FTEs

- Worksheet E Part A line 10: FTE count for allopathic and osteopathic programs in the current year
- . Worksheet E Part A line 11: FTE count for residents in dental and podiatric programs
- Worksheet E Part A line 16: Adjustment for residents in initial years of the program.

 Worksheet E Part A line 17: Adjustment for residents in initial years of the program.

- closure.

 Worksheet E-3 Part II line 6 (Inpatient Psychiatry Facility): Current year's unweighted FTE count of I&R excluding FTEs in the new program growth period of a "new teaching program".

 Worksheet E-3 Part II line 7 (Inpatient Psychiatry Facility): Current year's unweighted I&R FTE count for residents within the new program growth period of a "new teaching program".

 Worksheet E-3 Part III line 7 (Inpatient Rehabilitation Facility): Current year's unweighted FTE count of I&R excluding FTEs in the new program growth period of a "new teaching program".

 Worksheet E-3 Part III line 8 (Inpatient Rehabilitation Facility): Current year's unweighted I&R FTE count for residents within the new program growth period of a "new teaching program".

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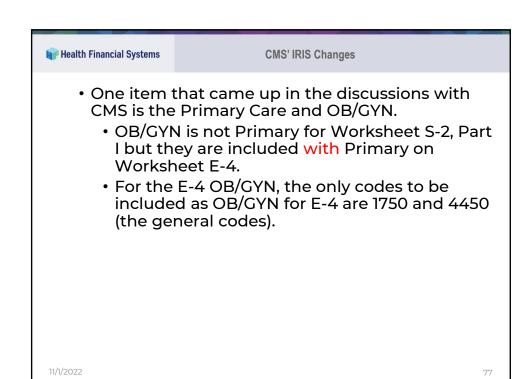
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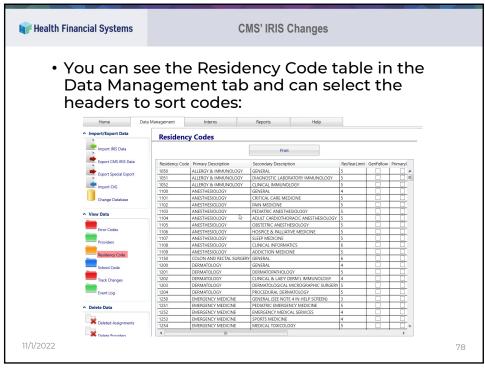


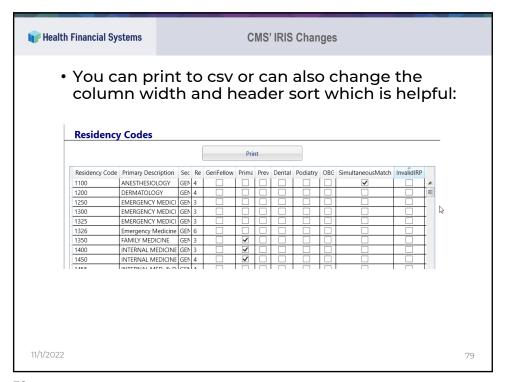
CMS' IRIS Changes

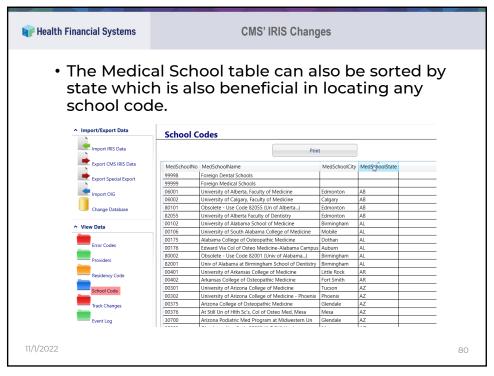
- During the IRIS build by CMS, they have reviewed the Residency Code table to produce a table which will be used by all to determine the proper FTE count. We wanted to wait on CMS to publish this final table before our release but could not.
- We have received a draft and there are changes which we have implemented prior to CMS publishing this table.
- One example is with Podiatry. We just received clarification from CMS that the only programs that are 3-year programs are those that are Podiatric Medicine and Surgical which are codes 7250, 7300, and 7350.

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- We are waiting on the publishing of the XML instructions.
- We are waiting on the tables showing the Initial Residency Period lengths to be used in calculation of FTEs, the Medical Schools and Residency Codes.
- We have also asked for the list of Edits to ensure consistency.

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CMS' IRIS Changes

- As shown on previous slides, CMS is moving to get rid of the M & A dbf files and going to 1 xml file for submission of IRIS with the cost reports.
- This will get rid of the free dos-based IRIS system and require providers to submit with the new system – more than likely with an IRIS vendor.
- We released these changes on March 27, 2020 along with the changes summarized in the following slides.
- The XML is now required with FYB 10-1-2021 and we have included the XML export but the FYB must be on or after 10-1-2021.

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- CMS will be adding the following new fields to IRIS:
 - Non-IRPS Year One Simultaneous Match
 - Non-IRPS Year One Prelim. Transitional
 - IRF % and IPF % for time spent at subprovider
 - Non-Provider Site %
 - New Program True or False
 - Displaced Resident True or False

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CMS' IRIS Changes

CMS' definitions of the new fields:

New Fields

Except for one field being removed (which is addressed in a subsequent section below), the new XML format will contain the same fields as the old DBF format plus the following new fields:

- Assignment IPF Percentage (Psych): The percentage of the Intern/Resident(IR)'s rotational
 assignment time period the hospital provider is allowed to count in its total number of FTE
 residents for Psych in the 2552-10 Cost Report's Worksheet E-3 Part II.
- Assignment IRF Percentage (Rehab): The percentage of the IR's rotational assignment time
 period the hospital provider is allowed to count in its total number of FTE residents for Rehab in
 the 2552-10 Cost Report's Worksheet E-3 Part III.
- Assignment Non-Provider Site Percentage: The percentage of the IR's rotational assignment time that was spent in allowable non-provider site settings. See 2552-10 cost report worksheet \$2 Lines 66 & 67.
- 4. Assignment Displaced Resident (True/False): Indicates whether the IR is an allowable displaced resident for which the hospital may receive a temporary cap adjustment. See 2552-10 worksheet E-4 line 16 (DGME) and worksheet E Part A line 17 (IME). Note that IRIS will track the raw number of displaced resident FTEs while what gets recorded in the cost report is an adjustment whose calculation, among other things, takes into account free cap slots. The displaced resident assignments recorded in IRIS do NOT directly sum to the displaced resident FTEs recorded in the cost report.

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- CMS' definitions of the new fields (continued):
 - 5. Assignment New Program (True/False): Indicates whether the resident is in the "initial years of a program that meets the exception to the rolling average rules" as per the cost report instructions. See 2552-10 worksheet E-4 Line 15 (DGME), worksheet E Part A Line 16 (IME), worksheet E-3 Part II Line 7 (Psych), and worksheet E-3 Part III Line 8 (Rehab).
 - Resident Non-IRP Year One Residency: For IRs that either participated in a
 preliminary/transitional year or a simultaneous match, this records the code for the residency
 type they were enrolled in during their first year as well as a 'type' value indicating whether it
 was a preliminary year or a simultaneous match.
 - Creation Software Name: Simple text field for recording the name of the software or vendor used to create the IRIS submission. This is meant to help CMS debug issues with specific files by identifying their source.

Removed Field

The XML format will not include an equivalent of the DBF master file Residency Years Completed (RESYEAR). This field was removed due to being redundant because the same value was already being tracked in a more granular and useful way at the assignment level (ARESYEAR in the assignment file).

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CMS' IRIS Changes

 CMS' instructions for the new non-IRP Yr 1 residency code (been a confusing field on what is needed):

Field	Record	XML Field(s)	Instructions
Non-IRP Year One Residency	Resident	nonIRPYearOneResiden cyCode	For IRs that either participated in a preliminary/transitional year or a simultaneous match, thi records the code for the residency type they were enrolled in during their first year as well as
<u>Code</u>		(Code and Type pair)	'type' attribute indicating whether it was a preliminary year or a simultaneous match.
			If an IR participated in a simultaneous match, that is indicated in an IRIS submission by having this field populated with a type value of "Simultaneous Match". For example, if an IR simultaneously matched into a 1400 Internal Medicine initial year and an 1100 Anesthesiolog program, then their Initial Residency Type code would be 1100 and this Non-IRP Year One Residency Code would be recorded as 1400 with type "Simultaneous Match".
			Refer to Federal Register Vol. 69, No. 154 (Aug 11, 2004) pg 49169-49172, 42 CFR
			413.79(a)(10), and Federal Register Vol 70, No. 155, (Aug 12, 2005) pg 47449-47452.
			For IRs that did not participate in a preliminary/transitional year or a simultaneous match, th field should be left blank.

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- The plan is to then be able to trace FTE amounts from IRIS files to the cost report for the following fields:
 - E Part A lines 10, 11, 16 (displaced), and 17 (new)
 - S-2 Part I line 66 cols 1 & 2, line 67 cols 3 & 4
 - E-3 Part II (Psych) lines 6 & 7 (new)
 - E-3 Part III (Rehab) lines 7 & 8 (new)
 - E-4 line 6, line 8 & 16 cols 1 & 2, line 10 col 2, and line 15 cols 1 & 2
 - E-4 lines 10.01, 15.01, and 16.01 (added in T10)

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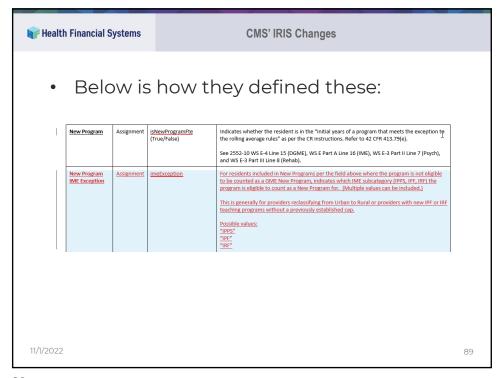
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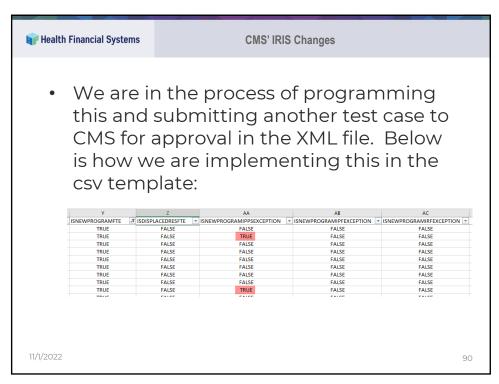


CMS' IRIS Changes

 CMS has instructed vendors there is an additional field to take into account New Programs for Urban hospitals who received Rural redesignations. They FTEs are considered new for IME but not for GME so this required a field to identify these assignments.

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Questions

- Questions?
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